

## CALIFORNIA COASTAL COMMISSION

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# Th1

**CD-0006-2**

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**UPDATED**

**11**

### CORRESPONDENCE

**Received between**

**8:00am,**

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**CD-0006-200**  
**(National Park Service)**

**UPDATED**  
**April 11, 2022**

**CORRESPONDENCE**  
**Letters from groups and**  
**organizations**

April 16, 2021

John Ainsworth  
Executive Director  
California Coastal Commission  
455 Market Street  
San Francisco, CA 94105

Sent via email to: [EORFC@coastal.ca.gov](mailto:EORFC@coastal.ca.gov)

Regarding: **Agenda Item Th18a: CD-0006-20 (National Park Service, Marin Co.)**

Dear Mr. Ainsworth:

Western United Dairies (WUD) and the California Cattlemen's Association (CCA) provide the following comments regarding the U. S. National Park Service Consistency Determination for their General Management Plan for the Point Reyes National Seashore (PRNS). WUD is a statewide dairy farm trade association representing four dairies located within the National Seashore, CCA is a statewide association of nearly 1,700 beef producers, including many of the ranchers located within the PRNS and GGNRA.

The existing ranches and dairy farms occupy about 20% of the National seashore, which exists today in part because of the contribution of land by their fathers and grandfathers in 1965 to preserve the beautiful landscape and historic agriculture traditions of the region. The ranchers today recognize their responsibility to protect the diverse and unique resources of the Seashore and work tirelessly in partnership with many agencies and partners, including the National Park Service, San Francisco Bay Regional Water Quality Control Board, and University of California Cooperative Extension natural resource experts in that endeavor. These farms and ranches are and continue to be forward thinking and innovative in the best practices they implement to sustain the coastal grasslands, provide a local food source to the communities of West Marin and the greater North Bay, and protect wildlife and fauna unique to the North Coast.

We urge the California Coastal Commission to approve the National Park Service's Water Quality and Climate Action Strategies for the General Plan Amendment's Consistency Determination No. CD-0006-20. Approval of these important elements will ensure continuing best practices for environmental stewardship of the wonderful natural and cultural resources we treasure in the Point Reyes National Seashore.

Sincerely,



Anja Raudabaugh  
Chief Executive Officer  
Western United Dairies



Kirk Wilbur  
Vice President of Government Affairs  
California Cattlemen's Association



4/1/2022

California Coastal Commission  
455 Market St, Suite 223  
San Francisco, CA 94105- 2219

*Submitted via e-mail*

**RE: April 7th, 2022, Hearing Item #Th18a, Condition Compliance for Consistency Determination No. CD-0006-20, National Park Service, 2020 General Management Plan Amendment for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area**

Dear Coastal Commissioners,

The Resources Renewal Institute and it's supporters thanks you for holding the National Park Service to the agreed-upon schedule as outlined in the post-hearing letter from the California Coastal Commission (CCC) to the National Park Service (NPS) dated May 10<sup>th</sup>, 2022. As conditioned, there was NPS agreement to bring a first-year version of its water quality strategy within a period of twelve months for public review. There was NPS agreement to make a presentation on a climate action strategy at the same time as the hearing on the water quality strategy. Also, there was NPS agreement to provide an annual report describing the status of free-ranging elk herds in the GMPA planning area, the effects of drought, and the results of elk management in the planning area.

The Resource Renewal Institute has reviewed the information shared in the NPS letter to the CCC dated March 4, 2022 along with the Climate Action Strategy and Water Quality Strategy prepared by the NPS and dated March 24, 2022. Below, we delineate deficiencies in the plan:

#### Climate Action Strategy

1. The CCC and the NPS agreed that the Climate Action Strategy would "identify actions that could be conducted in response to local (Marin County) and/or state (CA Air Resources Board) climate-related requirements, delineate current conditions, and put forth a strategy about how to move forward toward reducing greenhouse gas emissions from ranching operations in the GMPA area"

Instead of developing a water quality strategy for the CCC, the NPS has stated that they have achieved a reduction of 690 dairy animals, which will result in 4-27% reduction in NH<sub>3</sub>, a 15-17% reduction in VOC, a 16% reduction in CO<sub>2</sub>e, and a 17% reduction in PM<sub>2.5</sub>. These reductions were achieved due drought conditions that resulted in the failure of aquifer recharge at the I Ranch dairy, [as described by dairy rancher Bob McClure in a Point Reyes Light article](#) published shortly after the CCC narrowly approved their conditional consistency determination. These reductions were **not** achieved due to any NPS strategy.

Similarly, under the NPS's proposed "strategy" they will continue to achieve reductions in CO<sub>2</sub>e when operations close after they cause long-term adverse alterations of natural hydrological functioning and alterations of natural water quality into receiving waters, including the adjacent marine managed areas (MMAs) and areas of special biological significance (ASBS).



No carbon reduction/carbon neutrality milestones are identified. No on farm investments or adjustments are scoped out. They simply state that mandatory conditions will be developed and administered in future ranch plans. Clearly, these are not specific, measurable, actionable, realistic, or timebound goals. This “trust-us” approach does not hold the NPS accountable to state greenhouse gas reduction goals.

2. The CCC and the NPS agreed that this strategy would “consider how climate change initiatives from the Administration and Department of the Interior, to the extent that such initiatives are developed and pertinent, distill down to the level of Point Reyes National Seashore and the north district of Golden Gate National Recreation Area.”

A glaring omission from the NPS’s proposed Climate Action Strategy is the exclusion of the Department of Interior’s 2021 Climate Action Plan, which required some of the following commitments:

- *Use Best-Available Science and Traditional Knowledge.* Planning and decision-making will use the best-available information that considers existing and projected climate change vulnerabilities, risks, and impacts. Decision-making will also consider traditional knowledge, and the Department will meaningfully consult with Tribes and other indigenous communities throughout decision-making processes that affect their interests.
- *Mainstream Adaptation.* Climate change adaptation will be mainstreamed and integrated into Departmental policies, planning, practices, and programs. This will ensure that the Department’s decisions are not solely based on historic conditions but consider future scenarios and future-oriented management.
- *Tackle Inequity and Environmental Justice.* Issues of environmental justice and inequity will be integrated into decision-making to ensure adaptation efforts are sustainable and account for the impacts on all populations, including low-income communities, communities of color, Insular areas, and Tribes.
- *Maximize Co-Benefits.* Adaptation strategies will complement or directly support other climate-related initiatives, including respecting Tribal sovereignty and self-determination, improving disaster preparedness, promoting sustainable resource management, promoting environmental justice, restoring contaminated lands and waters, managing facilities sustainably to reduce energy and water consumption, and reducing greenhouse gas emissions
- *Apply Risk Management Methods.* Adaptation planning will incorporate risk management methods and tools that consider potential future climate conditions to identify, assess, and prioritize options to reduce vulnerability to the environmental, social, and economic impacts of climate change.

This is just one example of policy documents introduced and approved by the new administration, which affect the proposed action in the planning area. The Resources Renewal Institute believes that the intent of the Commission was to ensure that policies of the new administration were captured and explained in the NPS’s climate action strategy. Instead the NPS has excluded any mention of federal, state, or regional climate plans/goals that will guide their management actions.

### Water Quality Strategy

1. The CCC and the NPS agreed that the Water Quality Strategy would propose “overall strategy and timeline for assessing and improving water quality through installation of ranching-related infrastructure

and management practices in areas of the GMPA outside of the Tomales Bay watershed, including Abbott's Lagoon and Drake's Estero and the creeks that drain to these features, but also including watersheds that drain directly to the Pacific Ocean."

If water quality protection management activities (MAs) are predicted on yet-to-be-implemented a GMPA Zoning Framework and yet-to-be-designed ranch operating agreements on beef and dairy ranchers, then how can the CCC determine whether or not this strategy protects coastal resources to the maximum extent practicable?

2. The CCC and the NPS agreed that the strategy should be informed by existing water quality data, and water quality enhancement efforts that have proven successful elsewhere.

The NPS states that short-term and long-term bacterial water quality monitoring must be conducted to identify water quality concerns and target sources areas for improvement within the planning area. However, under Monitoring Program 3: Regulatory Dairy Monitoring, the NPS states that ranchers have been participating in qualified group monitoring to meet the San Francisco Regional Water Quality Control Board's General Waste Discharge Requirements (WDRs) for Confined Animal Facilities (CAFs).

Why doesn't the NPS require *existing* data from recent years to be submitted to the NPS to jump-start targeting of problem areas and implementation of MAs? This appears to be another oversight which will only delay long-overdue action.

Further, while the WDRs don't necessarily impose numeric effluent limits on nonpoint pollution sources in WDRs, there is nothing to prevent the NPS from imposing its own numeric discharge objective based on baseline data already captured in the annual submissions under the WDRs.

### Tule Elk Management

1. In their March 4, 2022 letter to the CCC the NPS notes that it has completed the 2021 population census for the Drakes Beach herd. The NPS stated that the Drakes Beach herd consists of ≈151 animals. Further, the NPS states it is currently engaged in government-to-government consultation (confidential) with the Federated Indians of Graton Rancheria under the General Agreement regarding the implementation of management actions for the Drakes Beach herd. Finally, the NPS states: "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals."

If the Drake's Beach herd exceeds the arbitrary population threshold of 140 elk approved in the Record of Decision for the GMPA, what protocols/MAs is the NPS using to evaluate the need for management actions to enforce the arbitrary population threshold? (To be sure, this is a question about how the public agency is evaluating the need for management actions, not a question about confidential consultations.)

What is the process the NPS will follow in informing partner agencies and the general public if they intend to implement management actions for the Drake Beach herd?

### Drought Conditions

1. In their March 4, 2022 letter to the CCC the NPS notes they required ranch operators to identify actions to address drought conditions, and that most ranchers adjusted operations due to the drought.

The NPS failed to mention that additional concerns about water quantity were revealed during communications between NPS and leaseholders—specifically Kehoe Ranch. In a NPS letter to Tim Kehoe dated August 19<sup>th</sup> 2021, the NPS stated: “Given that your dairy operation cannot currently be supported by existing water sources, and that you are hauling water daily to meet needs, it is imperative that you seriously evaluate current stocking rates and water use, and report changes that you will make to minimize impacts to resources.”

While rancher operators may avoid disruptions by trucking in water when natural water bodies are depleted, these water quantity issues indicate more serious ecological drought conditions that may be pushing hydrological systems beyond thresholds of vulnerability. How does the NPS plan to mitigate these issues and any downstream, spillover impacts on coastal resources and natural water quality in neighboring MMAs?

**The deficiencies above indicate that the CCC should reject the strategies proposed by the NPS.**

#### General Concerns about the Viability of Strategy Implementation

Fundamentally, the Resource Renewal Institute expresses grave concerns about the NPS’s track record enforcing leases with commercial beef and dairy operators at Point Reyes National Seashore. Since the CCC narrowly approved a conditional consistency determination in 2021, the Resource Renewal Institute has endeavored to update the Commissioners to on-the-ground conditions and new information related to proposed activities in the planning area within the CCC’s jurisdiction:

In March of 2021, the NPS announces die-off of one third of Tomales Point Tule elk herd due to drought. That same month five waterways at Point Reyes National Seashore were found to contain unsafe concentrations of bacteria — incl. 40 times the state health standards for E. coli at one site. (E-mails obtained via a Public Records Act request indicated that the State Water Board had concerns about the waste discharges, but needed additional information.)

After the CCC approved their conditional concurrence Consistency Determination No. CD-0006-20 on Earth Day 2021, I Ranch, the largest and oldest dairy ranch at the Seashore, shuts down due to exceptional drought conditions and an aquifer that stopped recharging on the ranch.

In late summer, birders [caught ranchers at Home Ranch bulldozing into an ESA streambank](#) that drains into the Drakes Estero State Marine Conservation Area (SMCA). Weeks later, [park visitors documented hazardous waste disposal violations at numerous ranches](#) adjacent to Drakes Estero SMCA.

Since then, our Freedom of Information Act requests have uncovered that additional ranches have had to truck in water because there is not adequate water supply in natural systems to meet the needs of ranch operators. And based on tips from the general public, the County of Marin is investigating failed and missing septic systems at ranch worker homes Point Reyes National Seashore. Untreated human sewage may be impacting living conditions for ranch workers and may be discharging directly into the Drakes Estero SCMA. (News publications forthcoming.)

To date, the general public has essentially been the enforcement agent for activities taking place at Point Reyes National Seashore. At the bottom of page 18, the NPS states: "Overall cost and funding availability may also influence timing and the nature of proposed management changes." This begs the question: are any of these well-intentioned proposals realistic if the NPS **already** has trouble overseeing and enforcing leases within the planning area?

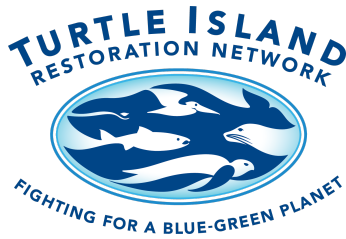
Federal Consistency regulations *§930.45 Availability of mediation for previously reviewed activities and §930.46 Supplemental coordination for proposed activities* allow you to reconsider your previously determined conditional concurrence and/or require additional remedial action/supplemental coordination if the proposed action is no longer deemed consistent to the maximum extent practicable.

Please hold the NPS accountable. Reject the proposed strategies due to the aforementioned deficiencies. And, based on findings that there is sufficient new information in the planning area that has been made available to the Commission regarding the proposed activity's effect on any coastal use or resources, please direct staff to reopen the conditional concurrence following the rejection.

Thank you for protecting California's coastal resources for current and future generations,

A handwritten signature in black ink, appearing to read "Chance Cutrano". The signature is fluid and cursive, with the first name "Chance" and last name "Cutrano" clearly distinguishable.

Chance Cutrano  
Director of Programs  
Resource Renewal Institute  
ccutrano@rri.org



VIA ELECTRONIC SUBMISSION

PointReyesManagementPlan@coastal.ca.gov

California Coastal Commission  
455 Market St, Suite 223  
San Francisco, Ca 94105- 2219

April 1, 2022

Turtle Island Restoration Network is a non-profit organization based in Marin County, representing over 150,000 members across the globe. Over the last thirty years, our organization has mobilized people in local communities to protect the oceans and inland watersheds that sustain them.

I am writing regarding our organization's concerns with the National Park Service's Water Quality Strategy for Point Reyes National Seashore, released on March 24th, 2022, as part of the requirements of the California Coastal Commission (CCC) last year's conditional concurrence.

It is evident that the National Park Service plans to continue delaying the creation and implementation of a robust water quality strategy to address some of the worst water quality sources in California. While I do applaud the Commission for rejecting NPS's extension of the Water Quality Strategy on March 11th, we need to ensure that timely enforcement mechanisms are applied to their submitted framework to hold these ranchers accountable if performance standards are not met.

Point Reyes National Seashore has long suffered from inadequate water quality. Data from 2012-2017 submitted by NPS show that some waters in the National Seashore rank in the top 10% of U.S. locations most contaminated by feces due to unchecked ranching operations. The data also indicates that Point Reyes National Seashore has been one of the ten 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.

Historically, NPS has fallen short on monitoring, mitigating, and enforcing severe concerns within the coastal zone. Public pressure has been the only driving force behind getting the NPS to address the pollution occurring in the National Seashore. Even after having a year to create a

Water Quality Strategy, NPS has not created a comprehensive plan. Instead, they supplied a “First-Year Version,” which further delays addressing the multi-decade long water quality problem occurring in the National Seashore. NPS’s seeming lack of urgency to address these historical water quality issues further shows that they are not prepared to stop the pollution in the National Seashore.

I urge the CCC to reject the Water Quality Strategy for the General Management Plan Amendment for Point Reyes National Seashore and North District Golden Gate National Recreation Area due to a lack of science-based timelines, milestones, and, enforcement mechanisms to hold polluters accountable if performance standards are not met.

This issue will not go away until pollution of the only National Seashore on the Pacific ends. Please do the right thing for our coast.

Sincerely,

Scott Webb  
Advocacy & Policy Manager  
Turtle Island Restoration Network



## National Wildlife Federation

National Advocacy Center

1200 G Street NW, Suite 900 • Washington, DC 20005 • 202-797-6800

April 1, 2022

Via Email: [EORFC@coastal.ca.gov](mailto:EORFC@coastal.ca.gov)

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

Re: Agenda Item Thursday 18a - CD-0006-20 (National Park Service, Marin Co.) (April 7, 2022),  
National Park Service Water Quality Strategy and Climate Action Plan

Dear Members of the California Coastal Commission:

On behalf of our more than 6.8 million members and supporters, the National Wildlife Federation urges the Coastal Commission to reject the Water Quality Strategy and Climate Action Strategy submitted by the National Park Service for the Point Reyes National Seashore General Management Plan Amendment (GMPA) Consistency Determination as neither comply with the Conditions established by the Commission, and neither will ensure the protection of the Seashore's biologically rich coastal resources. We also urge the Commission to withdraw the Conditional Concurrence with that Consistency Determination that was based on full and timely development of these critical strategy documents.

In the face of the National Park Service's failure to develop meaningful strategies within the agreed-to one year timeframe—and the long-standing and severe water quality degradation and other significant coastal resource damage caused by National Park Service-sanctioned ranching and dairy activities—we also recommend that the Commission require at least the following information before making any future decision on concurrence: (1) documentation of significant progress in achieving water quality standards for existing activities in the Park; (2) a detailed water quality plan that ensures compliance with water quality standards for GMPA activities and protection of coastal resources to the maximum extent practicable; and (3) a Climate Action Plan that will produce meaningful reductions in greenhouse gas emissions within the Park and increase the resilience of coastal resources to climate change.

The National Wildlife Federation is the nation's largest conservation education and advocacy organization. The Federation has more than 6.8 million members and supporters and conservation affiliate organizations in 52 states and territories. The Federation has a large California presence, including a California Regional Center, a California affiliate, and more than 645,000 California members and supporters. The Federation has a long history of advocating for the protection, restoration, and ecologically sound management of the nation's coastal resources, rivers, and wetlands and the fish and wildlife that rely on those vital resources. The Federation works throughout the state of California to restore habitat, connectivity, and corridors for wildlife.

## 1. Timely Compliance with Conditions I and IV Was Fundamental to the Conditional Concurrence

Full and timely compliance with Conditions I and IV was fundamental to the Commission's narrowly approved decision to conditionally concur with the Consistency Determination. As Commission staff wrote to the Service on May 10, 2021:

The Commission determined that, only as conditioned, could the GMPA be found consistent to the maximum extent practicable with the enforceable policies of the California Coastal Management Program. The Commission notes that as provided in 15 CFR § 930.4(b), should the NPS not agree with the Commission's condition of concurrence, then all parties shall treat this conditional concurrence as an objection.

Condition I requires the National Park Service to develop a detailed Water Quality Strategy to assess and improve water quality through best management practices and improved management of the Seashore's dairies and ranches. The Water Quality Strategy was required to be submitted to the Commission within 12 months for public review and Commission review and approval.<sup>1</sup> The Commission explicitly retained oversight and jurisdiction over Condition I, including that the Commission would independently determine whether the Water Quality Strategy protects coastal resources to the maximum extent practicable, and would approve or reject the Strategy based on that assessment.

Condition IV requires the National Park Service to develop a Climate Action Plan to address ranching activities. The Climate Action Plan was also required to be submitted to the Commission within 12 months.<sup>2</sup>

## 2. The Water Quality Strategy Does Not Comply with Condition 1 and Does Not Ensure Protection of Coastal Resources

Condition 1 requires the Service to provide a Water Quality Strategy that "shall have an overall purpose of assessing the effect of installed ranching best management practices and management measures on water quality throughout the GMPA planning area and prioritizing further measures to be implemented to reduce ranching on water quality."<sup>3</sup> This strategy is to describe specific water quality monitoring requirements, specific reporting requirements, and provide an:

"overall strategy and timeline for assessing and improving water quality through installation of ranching-related infrastructure and management practices in areas of the GMPA outside of the Tomales Bay watershed . . . informed by existing water quality data, and water quality enhancement efforts that have proven successful elsewhere (e.g., the Olema and Lagunitas Creek watersheds) and should prioritize resolution of the most significant water quality-related issues first, where practicable and as indicated by existing information. The timeline should reflect short- and long-term ranch management priorities related to water quality as expressed by the NPS and identified in ranch-specific ROAs."<sup>4</sup>

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<sup>1</sup> Consistency Determination No. CD-0006-20, Condition II.

<sup>2</sup> Consistency Determination No. CD-0006-20, Condition IV.

<sup>3</sup> Consistency Determination No. CD-0006-20, Condition I.

<sup>4</sup> Consistency Determination No. CD-0006-20, Condition I.



The Commission later clarified “that the first year version of the strategy, which would be the subject of a Commission hearing, will include specific water quality monitoring details with general priorities and objectives to improve water quality; future iterations of the strategy and/or annual reporting to the Executive Director will be more specific on implementing actions.”<sup>5</sup>

While the proposed Water Quality Strategy includes some information on monitoring, reporting requirements, and changes to the underlying GMPA established by the September 2021 Record of Decision,<sup>6</sup> the Water Quality Strategy fails to include any actual priorities or objectives for improving water quality. The Water Quality Strategy instead simply states that management activities, facility improvements, or operational changes may be developed in the future. For example:

- Once monitoring “sufficiently” identifies an area of concern, “a site-specific prescription of Management Activities will be developed, including proposed funding source(s), responsible parties, and timing for implementation”<sup>7</sup> which will be incorporated into the dairy’s ROA. “Overall cost and funding availability may also influence timing and the nature of proposed management changes. Across the PRNS coastal watersheds, management will be prioritized based on the level and persistence of benchmark exceedances.”<sup>8</sup>
- “Inspections of all dairy facilities, led by the Regional Board and in coordination with the NPS, were conducted February 3-4, 2022 to identify short-term and long-term management actions necessary for improvements. The Regional Board is in the process of preparing inspection reports, which will be delivered to dairy operators and PRNS staff when available. The NPS will incorporate any required facility improvements or operational changes into the forthcoming interim leases or future long-term leases, as appropriate, including timelines for completing improvements.”<sup>9</sup>
- For future dairy ROAs, “the NPS and dairy operators would evaluate infrastructure conditions and identify necessary measures for the operator to undertake to modernize manure management infrastructure and practices. If the operator is unable to commit to invest the necessary resources to meet this requirement, the dairy operation would cease within two years but could convert to beef.”<sup>10</sup>
- Future dairy “ROAs will include a schedule for implementation of modernization requirements to ensure resource protection outcomes related to water quality are realized as promptly as possible.”<sup>11</sup>

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<sup>5</sup> May 10, 2021 letter from the California Coastal Commission to the National Park Service.

<sup>6</sup> National Park Service. 2020. Record of Decision. General Management Plan Amendment for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area. Includes Appendices. September 13, 2021.

<sup>7</sup> Proposed Water Quality Strategy at 18.

<sup>8</sup> Proposed Water Quality Strategy at 18.

<sup>9</sup> Proposed Water Quality Strategy at 18

<sup>10</sup> Proposed Water Quality Strategy at 22.

<sup>11</sup> Proposed Water Quality Strategy at 23.

- For future beef operation ROAs “the NPS and beef operators will identify priority Management Activities to restrict cattle from sensitive riparian, freshwater wetland, and estuarine habitats to mitigate for potential water quality impacts from their operations.”<sup>12</sup>

These general statements highlighting the possibility of unnamed future actions do nothing to protect coastal resources and do not commit the National Park Service to implementing actions that might help protect coastal resources. The Water Quality Strategy does not protect coastal resources to the maximum extent practicable and should be rejected by the Commission.

### 3. The Climate Action Strategy Does Not Ensure Protection of Coastal Resources

Condition IV requires the National Park Service to submit a “Climate Action Plan to address ranching activities at the same time that it brings its water quality strategy to the Commission.” The Commission later provided the following clarifying guidance:

First, the plan should be more properly characterized as a climate action strategy in that it would identify actions that could be conducted in response to local (Marin County) and/or state (CA Air Resources Board) climate-related requirements, delineate current conditions, and put forth a strategy about how to move forward toward reducing greenhouse gas emissions from ranching operations in the GMPA area. Second, the NPS further described that this strategy would consider how climate change initiatives from the Administration and Department of the Interior, to the extent that such initiatives are developed and pertinent, distill down to the level of Point Reyes National Seashore and the north district of Golden Gate National Recreation Area, and then discuss with leaseholders opportunities to innovate or adapt ranch operations. Third, the NPS will make a presentation on the climate action strategy at the same time (i.e., one year after initial Commission concurrence) as the hearing on the water quality strategy. Finally, the NPS and the Commission recognized that there are fewer climate-related metrics than there are for water quality.<sup>13</sup>

The four page Climate Action Strategy does not meet these requirements. Instead, the Climate Action Strategy simply outlines changes to the underlying GMPA established by the September 2021 Record of Decision,<sup>14</sup> and states that operational considerations and recommended Management Activities actions will be identified in the future and will become mandatory requirements elements of new lease/permits issued under the GMPA. The Climate Action Strategy also states that:

The NPS is not yet in a position to definitively identify investments and adjustments on dairies, but the NPS is committed to identifying and presenting this information through submittal of a future iteration of this Climate Action Strategy to the Commission in advance of issuing GMPA lease/permits. Toward this end, the NPS is monitoring the development of scalable infrastructure technologies for small dairy operations (e.g., solids separators and methane

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<sup>12</sup> Proposed Water Quality Strategy at 22.

<sup>13</sup> May 10, 2021 letter from the California Coastal Commission to the National Park Service.

<sup>14</sup> National Park Service. 2020. Record of Decision. General Management Plan Amendment for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area. Includes Appendices. September 13, 2021.

digestors) and operational approaches (e.g., alternate feed solutions) that could be taken to further reduce emissions from existing operations.<sup>15</sup>

The National Wildlife Federation supports the decision not to issue a new dairy lease for I Ranch following the voluntary, market-based decision by the McClure Dairy to cease operations by July 2021. This will result in water quality improvements and reductions in GHG emissions. However, we believe a far more appropriate outcome would be to phase out all dairy leases given the highly significant adverse impacts of dairy operations on coastal resources.

We also support the decision to remove crops and commercial chickens from the list of diversification activities that could be authorized without additional review under the National Environmental Policy Act (NEPA), as established in the ROD, because NEPA review for such activities is clearly required by existing law and will result in more informed and better decisions. However, a far more appropriate outcome would be to prohibit such new and destructive diversification entirely, which would help prevent additional degradation of water quality and increases in GHG emissions.

The National Wildlife Federation is also troubled by the National Park Service's apparent rationale for requiring NEPA review of such diversification. According to the Climate Action Strategy, requiring ranchers to pay for and prepare site specific NEPA planning and associated compliance before being able to farm crops and commercial chickens would make the "anticipated impacts of up to 45 acres of crops and 9,000 chickens (as analyzed in the FEIS) less likely to occur."<sup>16</sup> NEPA is not a tool for discouraging action, NEPA is a critical tool for improving decision making, increasing transparency in federal decision making, and giving the public a voice in federal actions that can have profound impacts on lives, livelihoods, and the environment.

We also note that even with the cessation of dairy operations at I Ranch and the reductions in diversification impacts, the National Seashore will still contribute an incredible 17.2% of the agricultural sector greenhouse gas emissions in Marin County and 4.8% of the total greenhouse gas emissions in Marin County.

#### 4. Conclusion

Ranching and dairy activities in the Point Reyes National Seashore are having significant and long-lasting spillover impacts to the incredible natural resources of California's coastal zone. Studies show that the National Seashore has some of the worst water pollution in the state of California, with cattle manure constituting the single largest source of water pollution. Dairy and ranching operations in the National Seashore are also releasing significant quantities of greenhouse gasses in addition to causing soil erosion, loss of native plant species and infestation by invasive plants, declines in fish and bird populations, conflicts with wildlife, and loss of public access to public land.

Neither the Water Quality Strategy nor the Climate Action Strategy comply with the Conditions established by the Commission, and neither strategy will ensure the protection of the Seashore's biologically rich coastal resources. As a result, the National Wildlife Federation urges the Commission to reject these strategies and withdraw the Conditional Concurrence with the GMPA Consistency

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<sup>15</sup> Climate Action Strategy at 4.

<sup>16</sup> Water Quality Strategy at 20.

Determination (CD-0006-20). Any future decisions on concurrence should be made only if the National Park Service first supplies: (1) documentation of significant progress in achieving water quality standards for existing activities in the Park; (2) a detailed water quality plan that ensures compliance with water quality standards for GMPA activities and protection of coastal resources to the maximum extent practicable; and (3) a Climate Action Plan that will produce meaningful reductions in greenhouse gas emissions within the Park and increase the resilience of coastal resources to climate change.

Thank you for your consideration of these comments. Please contact me at [sametm@nwf.org](mailto:sametm@nwf.org) or 415-762-8264 if you have any questions or would like additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Melissa Samet". The signature is fluid and cursive, with the first name "Melissa" written in a larger, more prominent script than the last name "Samet".

Melissa Samet  
Senior Water Resources Counsel  
National Wildlife Federation

PO Box 103  
Forest Knolls, CA 94933  
415.342.7956



Web: [riverottterecology.org](http://riverottterecology.org)  
Facebook.com/BayAreaOtters  
Instagram: @riverottterecology

April 1, 2022

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

Via email to: [EORFC@coastal.ca.gov](mailto:EORFC@coastal.ca.gov)

Re: Agenda Item Th18a: Condition Compliance for Consistency Determination CD-0006-20, National Park Service, 2020 General Management Plan Amendment for the Point Reyes National Seashore and the North District of Golden Gate National Recreation Area.

### **Oppose Approval of the Water Quality Strategy and Climate Action Plan**

Dear Commissioners:

River Otter Ecology Project, based in Marin County, CA, engages the public in supporting conservation and restoration by linking river otter recovery to the health of our watersheds through research, education, and community science. River otters, although not a protected species, are sentinel apex predators whose habitat includes all parts of watersheds, including the coast. Their presence and success are important indicators of ecosystem function and environmental health, including the biological productivity and quality of coastal waters.

We oppose approval of the National Park Service (NPS) Water Quality Strategy and Climate Action Plan for the following reasons:

#### **1. The submitted Water Quality Strategy is not a good-faith effort to comply with Condition 1 of the Consistency Determination.**

In its March 4, 2022 letter to Commission staff, NPS asserted that it could not comply with Condition 1 in a timely manner due to delays in finalizing the GMPA and Record of

Decision, and subsequent litigation. The Water Quality Strategy submitted, only three weeks later, largely reiterates information and aspirational plans from Appendices F and L of the GMPA Final Environmental Impact Statement. This information was already available to the Commission and the public in April 2021, when the Commission included Condition 1 in its Consistency Determination Concurrence. If it satisfies Condition 1, then for all practical purposes, Condition 1 has no meaning or effect.

**2. Condition 1 requires Executive Director review and approval of the Water Quality Strategy.**

Due to NPS' delay in submitting the Water Quality Strategy, the Commission's staff and Executive Director have not had the opportunity to review and assess the Strategy. In its decision-making, the Commission regularly relies on the expertise of staff, and it would be well-served to do so in this case. The Commission can request that NPS withdraw its submission and return in the very near future, after staff has had an opportunity to review the Water Quality Strategy and form a recommendation for your consideration.

**3. The Commission may want to consider revoking its concurrence with the Consistency Determination.**

Under the present circumstances, the Commission may want to reconsider its concurrence with the Consistency Determination. However, it first may want to consider staff's assessment of NPS' compliance with the conditions of concurrence. To the extent that revocation of the Commission's concurrence may cede its authority under the Coastal Zone Management Act, such a decision may have unintended consequences, and should be carefully considered in conjunction with input from staff.

Thank you for your thoughtful attention to this very important issue.

Respectfully,

A handwritten signature in cursive script, reading "Megan Isadore".

Megan Isadore  
Executive Director

# MISSIONREWILD

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

Based in Marin County, California

From: Matthew Polvorosa Kline  
Founder & Director

To: California Coastal Commission  
455 Market Street, Suite 223  
San Francisco, CA 94105-2219  
Via email: NorthCoast@coastal.ca.gov

Re: **Thursday April 7th, 2022. Agenda Item #TH18a, National Park Service  
Consistency Determination No. CD-0006-20**

April 1, 2022

Dear Commissioners,

Inspired to do more for and on behalf of our natural world and the incredible unique biodiversity found throughout, I launched Mission Rewild at the end of 2021. One of the driving motivations behind this endeavor was and is the ongoing tragedy called Point Reyes National Seashore (PRNS).

Over the years, I have spent thousands and thousands of hours extensively documenting and experiencing all that this park has to offer - the good, the bad, and the ugly. My focus has been primarily on observing and documenting our Seashore's spectacular native flora, fauna and interconnected habitat types.

My family and I care deeply about the current state as well as the future direction of our Seashore. I say "our" because it is in fact public land we are discussing here - a huge geographically important chunk of California natural heritage along our cherished coast - an area of global biological significance, and our only West Coast National Seashore.

I would like to thank Commissioners who continue to stand up for the health of our Seashore. Thank you for holding the National Park Service (NPS) accountable and to the conditions in which you agreed last year. Thank you for insisting on a Water Quality Strategy and Climate Action Plan. Your leadership on this matter is critically important, make no mistake about it, California must continue to be a symbol of higher environmental standards and key decision makers such as yourselves must challenge the status quo and lead with vision and integrity.

Now, as for the NPS Water Quality Strategy and Climate Action Plan, what would lead anyone to believe the NPS is acting in good faith? Do you sincerely believe, after pushing back against, and then hastily and reluctantly putting forth such a plan, they will actually carry through with implementing it? Where has the effort been to improve water quality over the last six decades? Serious environmental issues need sincere and proactive leadership, I'm afraid to say that the NPS in PRNS exhibits very little.

Unfortunately, I learned the hard way and from firsthand experience to not trust anything that PRNS officials say. In 2020 and 2021, I personally documented and shared my observations and pleaded with the NPS to do something or anything in the face of a massive problem I witnessed unfolding and what would later be acknowledged by the NPS as another die-off of Tule elk in the Tomales Point Tule Elk Reserve. Their dishonorable actions and willful ignorance was extremely telling and I realized from this very traumatic experience not to trust what park officials in PRNS told me and/or stated publicly otherwise. Only after tremendous public pressure, constant revelations from concerned citizens, and a change in administration, did the NPS in PRNS finally listen - by then it was already too late.

We cannot afford to let this “world renowned” public agency completely ignore its obligations and dismiss its essential mission time and time again here in our Seashore. I ask you dear Commissioners, be our best line of defense against the ongoing tragedy that is - Point Reyes National Seashore. I strongly urge you to see through the disguise of stewardship the NPS wears here and withdraw your Consistency Determination CD-0006-20. This plan does not truly meet the high standards and requirements for such consistency to protect our fragile and critically important public coastal resources and waterways.

Thank you very much for your time, consideration, and leadership on this matter.

Sincerely,  
Matthew Polvorosa Kline

**MISSIONREWILD**

[www.MissionRewild.org](http://www.MissionRewild.org)  
Based in Marin County, California





**Laura Cunningham**  
**California Director**  
**Western Watersheds Project**

PO Box 70  
Beatty, NV 89003  
(775) 513-1280  
lcunningham@westernwatersheds.org  
www.westernwatersheds.org

*Working to protect and restore Western Watersheds and Wildlife*

California Coastal Commission  
455 Market St, Suite 223  
San Francisco, Ca 94105- 2219  
Via US mail and web portal

March 30, 2022

Via email: [NorthCoast@coastal.ca.gov](mailto:NorthCoast@coastal.ca.gov)

**RE: California Coastal Commission consideration of Water Quality Strategy and Climate Action Plan developed by National Park Service for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area**

Dear Commissioners,

Western Watersheds Project is a non-profit organization with more than 12,000 members and supporters. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives, and legal advocacy.

The National Park Service (NPS) on March 24, 2022, finally released its Water Quality Strategy and Climate Action Plan for the ranch-leases on Point Reyes National Seashore and the North District of Golden Gate National Recreation Area, as part of the requirements of the California Coastal Commission (CCC) conditionally concurring 12 months ago with the consistency determination submitted by the NPS for their 2020 General Management Plan Amendment.

On April 7, 2022, the California Coastal Commission will consider the submitted Water Quality Strategy and Climate Action Plan developed by National Park Service (NPS) as specified in Conditions I and IV of the Coastal Commission's conditional concurrence on Consistency Determination No. CD-0006-20.

I have read the NPS Water Quality Strategy and Climate Action Plan and offer these comments.

1. **Public pressure has apparently been the only way that the NPS has been compelled to act to present a draft climate and water quality plan.** NPS had 12 months to develop such a plan but asked for an extension. During public hearing on March 11, 2022, Commissioners were opposed to that extension request and directed staff to bring forth NPS' Water Quality Strategy and Climate

Action Plan for consideration at the Commission's April 2022 hearing. Meanwhile, the interested public already developed and implemented an independent water quality monitoring plan, using volunteers, a professional civil engineer, and crowd-sourced funding, with results showing extreme impairment of natural resources, water pollution, and human health hazards due to fecal coliform bacteria and other indicators of cattle manure inputs to water bodies on these public lands >>[January 2021 Surface Water Quality Monitoring Report](#). I presented this data to the CCC in the past hearing, and NPS was fully aware of our results. The federal government should be held accountable to meet similar deadlines in order to address human health hazards at public park beaches, severe water quality results, and natural resource impairments of popular public lands.

2. **Many portions of the NPS plan are deferred into the future or are vague.** Future iterations of the water quality strategy are pushed to the future again—a “First Year Version” seems to kick the can down the road. This is not acceptable. NPS uses Adaptive Management as an excuse to push vital climate and water quality monitoring plan details into the future beyond public scrutiny. Again, if independent water quality monitors on these public lands can mobilize a water quality monitoring strategy and sampling effort, following the best science, then the NPS should be able to fully implement this strategy now. We need the full plans now, not later.
3. **Removing livestock is the only way to meet water quality standards and reduce harmful emissions that contribute to climate change.** NPS admits that the reduction in authorized dairies from six to five, a 22% reduction in dairy animals, will result in reduced air emission associated with agricultural activities, and thus positively contribute to the park's Climate Action Strategy. We have submitted comments to NPS that this is precisely the best way to help reduce climate change impacts: remove the commercial livestock from these park units, and that will be the single best method to eliminate climate impacts.

NPS also admits that reducing the total acreage of manure spreading from dairies will reduce harmful climate emissions; as well as removing half of forage production acres from these park lands (intensive silage agriculture for dairy milk production).

NPS also admits that removing commercial chicken production and row crop agriculture in its final decision will also reduce greenhouse gas emissions. Such measures as methane digesters are only a band-aid to reduce climate change impacts, and do not actually reduce the truckloads of cattle manure produced by these operations.

Clearly, removing commercial livestock production on these high-quality public lands and waters would truly meet the CCC's high standard to protect coastal resources for the benefit of the public and improve water quality and meet climate

goals. Only by removing commercial livestock operations from these National Park unit lands will climate change and water quality goals and objectives be met.

**Recommendation:** The Commission should not approve the NPS March 24, 2022, Water Quality Strategy for the General Management Plan Amendment for Point Reyes National Seashore and North District Golden Gate National Recreation Area, on the grounds that it is not consistent with Condition I of the Commission's conditional concurrence with Consistency Determination No. CD-0006-20.

The timeline would not have been met, except by continual pressure from the public. NPS at first allowed water quality standards to be voluntarily met by lessees, then with increased public outrage NPS changed this to mandatory water quality programs.

Please review the outpouring of public comments, including these, on the failure of NPS to truly meet the requirements for consistency to protect public coastal resources.

Thank you,

Laura Cunningham

A handwritten signature in blue ink, appearing to read 'Laura Cunningham', is positioned below the printed name.

California Director  
Western Watersheds Project  
Cima CA 92323  
Mailing: PO Box 70  
Beatty NV 89003  
775-513-1280  
[lcunningham@westernwatersheds.org](mailto:lcunningham@westernwatersheds.org)

March 25, 2022

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

**RE: Request for Commission Action on the Point Reyes Coastal Consistency Determination (CD-0006-20) at the April 2022 Meeting**

Chair Brownsey, Vice Chair Hart and Members of the Commission:

The undersigned **122** conservation groups, environmental justice organizations, and local businesses hold diverse positions on the future role of agriculture in the Seashore, ranging from supporting to opposing the continuation of agriculture leases in the Seashore. Yet we are united in our **request that the Coastal Commission put the Point Reyes Consistency Determination on the April 2022 Commission Agenda for action by the Commission, including the option to revoke the Conditional Concurrence it issued in April 2021.**<sup>1</sup>

When the Commission narrowly approved Conditional Concurrence by a 5-4 vote last April, it specifically directed the National Park Service (NPS) to address serious concerns it had with topics ranging from water quality to Tule Elk to climate change. For example, the Commission added a condition that the NPS would bring a water quality strategy to the Commission **within 12 months for public review and Commission review and approval.**<sup>2</sup> Importantly, the Commission retained oversight and jurisdiction over this condition, including independently reviewing the NPS' water quality strategy to determine if it protects coastal resources to the maximum extent practicable, or if it should be rejected. Due to the very urgent concerns raised by the Commission and members of the public, the Conditional Concurrence required action on this matter within 12 months, which would be April 2022.

As Commission staff wrote to the NPS on May 10, 2021, "[t]he Commission determined that, only as conditioned, could the GMPA be found consistent to the maximum extent practicable with the enforceable policies of the California Coastal Management Program. The Commission notes that as provided in 15 CFR § 930.4(b), should the NPS not agree with the Commission's condition of concurrence, then all parties shall treat this conditional concurrence as an objection."

The NPS must be held accountable to bring forth adequate resource protection strategies within the timeframe the Commission directed, and NPS agreed to, a year ago. Development of these strategies within the one-year timeframe was fundamental to the Commission's decision to conditionally approve

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<sup>1</sup> The current wording of the April 2022 agenda notes the Commission will consider this matter, but it is not clear that the Commission will vote on if the NPS has produced an adequate Water Quality Strategy within 12 months as required by the Commission: "Coastal Commission consideration of Water Quality Strategy and Climate Action Plan developed by National Park Service (NPS) as specified in Conditions I and IV of the Coastal Commission's conditional concurrence on Consistency Determination No. CD-0006-20 for the 2020 General Management Plan Amendment for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area, Marin County."

<sup>2</sup> "Condition: The National Park Service will bring its water quality strategy to the Commission within a period of twelve months for public review, as well as Commission review and approval."

the Consistency Determination and remains essential for ensuring the protection of one of the most biologically important areas in the state. Please ensure that this Point Reyes Consistency Determination is placed on the April 2022 agenda for action by the Commission, including the option to revoke the Conditional Concurrence.

Sincerely,

Chance Cutrano  
Director of Programs  
**Resource Renewal Institute**

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

*And the following undersigned signatories*

Bonnie Kellogg  
President  
**2 Wheel Safety Training**

Dr. Ana Noles  
Owner  
**Ana E Noles, PsyD**

Mike Young  
Political and Organizing  
Director  
**California Environmental  
Voters (formerly CLCV)**

Bonnie Robins  
Director  
**Access Nature, Lewisboro  
Land Trust**

Anna Cramer  
Owner  
**Ann Kramer Photography**

Daniel Glusenkamp  
Executive Director  
**California Institute for  
Biodiversity**

Theodora Simon  
Investigator  
**ACLU of Northern California**

Craig Elson  
Founder  
**Arbor Lane Investments**

Isabella Langone  
Conservation Program  
Manager  
**California Native Plant  
Society**

Eric Mills  
Coordinator  
**ACTION FOR ANIMALS**

Christine Kittinger  
Vice President  
**Assets Unlimited, Inc.**

Michael Painter  
Coordinator  
**Californians for Western  
Wilderness**

Julie Krachman  
Secretary/Treasurer  
**Adiscovery**

Jules Evans  
Principal  
**Avocet Research Associates**

Jeff Miller  
Executive Director  
**Alameda Creek Alliance**

Sally Harati  
Director  
**Ban Toxic MHF**

Jeff Miller  
Senior Conservation  
Advocate  
**Center for Biological  
Diversity**

Theresa Harlan  
Director  
**Alliance for Felix Cove**

Derick Carss  
Photographer  
**Before it Gets Dark**

Michael Garrity  
Executive Director  
**Alliance for the Wild Rockies**

Birgit Winning  
Executive Director  
**Bluecology**

Lia Schnipper  
Co-Chair  
**Center Reach Farm, LLC**

Cara Dana  
CEO  
**CGDana Photography**

Michael Murray  
Chair  
**Coalition to Protect  
America's National Parks**

Jia Li  
Founder  
**Consciously be**

Denise Boggs  
Director  
**Conservation Congress**

James McLachlan  
Director  
**Conundrums2Solve**

Jason Doherty  
Founder/Director  
**Daraja Education Fund**

Dave Rothwell  
Owner  
**Dave Rothwell Photography**

Debbie Fier  
Owner  
**Debbie Fier Photography**

Nancy Graalman  
Director  
**Defense of Place**

Dene Miles  
Owner  
**Dené Miles Photography**

Lindsay Donald  
Founder  
**Donald Photography**

Tara Thornton  
Deputy Director  
**Endangered Species  
Coalition**

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Executive Director  
**Environmental Protection  
Information Center- EPIC**

Morgan Patton  
Executive Director  
**Environmental Action  
Committee of West Marin**

Robert Raven  
Founder  
**everythingismc2.org**

Sheila Newenham  
President  
**Exploring Nature**

Joe Sweeney  
Organizer  
**ForElk**

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Executive Director  
**Friends of Islais Creek**

Matt Maguire  
President of the Board  
**Friends of Lafferty Park**

Larry Campbell  
Conservation Director  
**Friends of the Bitterroot**

Judy Schriebman  
Secretary  
**Gallinas Watershed Council**

Joseph III Scalia  
President  
**Gallatin Yellowstone  
Wilderness Alliance**

Daniel Heagerty  
Senior Director  
**Generation Our Climate**

Laura Cremin  
Vice President of the Board  
**Golden Gate Audubon  
Society**

Daniel Heagerty  
Executive Director  
**Granite Chief Wilderness  
Protection League**

Bradley Angel  
Executive Director  
**Greenaction for Health and  
Environmental Justice**

Shanna Edberg  
Director of Conservation  
**Hispanic Access Foundation**

David McGuire  
Director  
**Shark Stewards, Earth Island  
Institute**

Jonathan Huyer  
President  
**Huyer Perspectives  
Photography**

Lisa Levinson  
Campaigns Director  
**In Defense of Animals**

Rudi Dundas  
Director  
**Innerlight Photo**

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Associate Director  
**International Marine  
Mammal Project, Earth  
Island Institute**

Jill Fortin  
Director  
**Jay Witcher Orchestra**

Jennifer Hadley  
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**Jennifer Hadley  
Photography**

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Owner  
**Jim Zipp Photography**

John Comisky  
Owner  
**John Comisky Photo**

Julie Picardi  
Owner  
**Julie Picardi Photography**

Keith Flood  
Owner  
**Keith C. Flood Photography**

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Executive Director  
**Klamath Forest Alliance**

Patricia Puterbaugh  
Principle  
**Lassen Forest Preservation  
Group**

Barbara Salzman and Roger  
Harris  
Conservation Committee Co-  
Chairs  
**Marin Audubon Society**

David Long  
Co-President  
**Marin Chapter of the  
California Native Plant  
Society**

Jennifer Valentine  
CEO  
**married in the forest**

Michelle Waters  
Owner  
**Michelle Waters Art**

Deb Castellana  
Director of Strategic Alliances  
**Mission Blue**

Matthew Polvorosa Kline  
Founder  
**Mission Rewild**

Victoria Canby  
Executive Director  
**Museum of the American  
Indian**

Melissa Samet  
Senior Water Resources  
Counsel  
**National Wildlife Federation**

Gerald Meral  
California Water Program  
Director  
**Natural Heritage Institute**

Rene Voss  
Director  
**Natural Resources Law**

Gary Theisen  
Owner  
**Northwoods Photo**

William Rossiter  
Vice President  
**NY4WHALES**

Pradip Thachile  
Managing Member  
**OH Investors A**

Joan Maloof  
Executive Director  
**Old-Growth Forest Network**

Patricia Mitchell  
Owner  
**Patricia Mitchell  
Photography**

Tracy Reiman  
Executive Vice President  
**PETA (People for the Ethical  
Treatment of Animals)**

Jonas Minton  
Senior Water Policy Advisor  
**Planning and Conservation  
League**

Daniel Dietrich  
Owner  
**Point Reyes Safaris**

Brian Elliot  
Conservation Director  
**Pomona Valley Audubon  
Society**

Camilla Fox  
Executive Director  
**Project Coyote**

Jeff Ruch  
Pacific Director  
**Public Employees for  
Environmental  
Responsibility (PEER)**

Marilyn Jasper  
Chair  
**Public Interest Coalition**

Tom Baty  
Board Chair  
**Public Lands Conservancy**

Douglas Punzel  
Operations  
**PunzPics**

Tony Sehgal  
Media Producer  
**Pygmy Mammoth Productions**

Miyoko Schinner  
Founder  
**Rancho Compasion**

Lisa Owens Viana  
Director  
**Raptors Are The Solution**

Rhett Taber  
Owner  
**Rhett's Wildlife Excursions**

Roy Dunn  
Owner  
**Roy Dunn Photography**

Drew Feldmann  
Conservation Chair  
**San Bernardino Valley Audubon Society**

Sandra Zelasko  
Owner  
**Sandra Lee Photography**

Shani Kleinhaus  
Advocate  
**Santa Clara Valley Audubon Society**

Gordon Bennett  
President  
**Save Our Seashore**

Diane Gentile  
Founder  
**Save Point Reyes National Seashore**

Kathy Kayner  
Secretary  
**Save The American River Association**

Kerry Kriger  
Executive Director  
**SAVE THE FROGS!**

Ara Marderosian  
Executive Director  
**Sequoia ForestKeeper®**

Alan Carlton  
Chair, SF Bay Chapter Federal Lands Committee  
**Sierra Club**

Nickolaus Sackett  
Director of Legislative Affairs  
**Social Compassion in Legislation**

Shanti Zinzi  
Owner  
**The Nature of the Beast**

Jack Gescheidt  
Founder  
**The TreeSpirit Project**

William Given  
President  
**The Wild Source**

Chris Brinkman  
President  
**TNL Holdings inc**

Christine Price  
Founder  
**Tribal ground**

Scott Webb  
Advocacy Manager  
**Turtle Island Restoration Network**

Scott Artis  
Executive Director  
**Urban Bird Foundation**

Nancy Valente  
Principal  
**Valente Archaeological Consulting**

Laura Chariton  
President  
**Watershed Alliance of Marin**

Eric Molvar  
Executive Director  
**Western Watersheds Project**

Alison Hermance  
Director of Communications  
**WildCare**

George Nickas  
Executive Director  
**Wilderness Watch**

Will Tabor  
Owner  
**Will Taber ornithology**

Max Venturi  
Photographer  
**Max Venturi Photography**

Lisa Robertson  
President & Co-Founder  
**Wyoming Untrapped**



**CD-0006-20**  
**(National Park Service)**

**UPDATED**  
**April 11, 2022**

**CORRESPONDENCE**

**Form Letters**

Message to California Coastal Commission:

I was shocked to see that the National Park Service (NPS) is pushing forward with an inhumane, ecologically unsound, and wildly unpopular amendment decision to extend ranch operating agreements at Point Reyes National Seashore. Allowing ranchers and dairies to raise livestock is slowly eliminating the protected and endangered tule elk in the national park by fencing them out of much of their natural grazing land, which is unthinkable cruel, particularly considering the current drought conditions.

It's vital for the health of the environment that ranching activities at Point Reyes be ended. Livestock ranching and farming operations not only consume immense amounts of water (1,799 gallons of water are required to produce a pound of cow flesh, and it takes 4.5 gallons to produce a gallon of cow's milk) but also emit massive amounts of toxic runoff, which contaminates the water supply with manure, antibiotics, and hormones. They're also responsible for overgrazing, loss of topsoil and erosion, and soil compaction. In addition, by some estimates, animal agriculture is responsible for more greenhouse-gas emissions than the entire transportation sector. These activities are so damaging that the sensitive and unique ecosystem at Point Reyes stands to be utterly destroyed.

Please determine the plans provided by the NPS in accordance with the conditions set by the California Coastal Commission (CCC) on April 22, 2021, insufficient and revoke the CCC's permission to conditionally allow the NPS' plan to keep a large portion of Point Reyes National Seashore in private ranching hands, as the NPS has not satisfactorily met these conditions.

**CD-0006-2**  
( )

**UPDATED**  
**11**

## **CORRESPONDENCE**

**Individual Emails**

---

**From:** Robert Johnston <[rajohnston@ucdavis.edu](mailto:rajohnston@ucdavis.edu)>

**Sent:** Tuesday, March 8, 2022 11:14 AM

**To:** Materials <[materials@coastal.ca.gov](mailto:materials@coastal.ca.gov)>

**Subject:** For Thur 2, Public Comments

CCC Staff,

This is for my Public Comment at tomorrow's commission meeting. Pls put it up during my remarks. I'm Thurs 2 Johnston. Pls also send this email to the commissioners just before the meeting.

A year ago the CCC required the NPS at PRNS to monitor and improve water quality by reducing pollution from the dairies. However: The park seems to have made no improvements to the manure management at the six dairies. And the park seems to have not even begun their monitoring this Fall. We request that your reception of their report to you in April be open for public comment.

I'll speak briefly about the very poor water quality at Kehoe Lagoon in Pt Reyes National Seashore. The photo is of kids playing in the outlet stream on Kehoe Beach. This stream exceeds coliform standards for contact recreation by up to 100X!! during the rainy season (late Fall, early Winter).

Our water quality sampling Program over the last few months shows widespread exceedances of coliform standards in almost all of the streams draining dairies in the park. We will send our engineer's report to the water board and to you this month.

Thanks,

Bob

Robert A. Johnston  
415 663-8305 landline  
530 559-0032 cell/text  
PO Box 579, Pt Reyes  
Stn, CA 94956

**Subject:**Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-20 (National Park Service, Marin Co.)

**Date:**Tue, 29 Mar 2022 15:03:23 -0700

**From:**Jon Spear <[jon@spearlab.com](mailto:jon@spearlab.com)>

**To:**[FORFC@coastal.ca.gov](mailto:FORFC@coastal.ca.gov)

Dear California Coastal Commission,

I'm a concerned citizen who enjoys nature, and I want you to do whatever is necessary to protect and restore wilderness areas at Point Reyes.

It's ridiculous that cows from commercial ranching operations in a public park have continued, for decades, to foul our environment.

The recent NPS letter, referenced "L7617" fails to address the ongoing issues of surface and ocean water pollution, local and global climate effects of livestock operations, and poor management of native elk herds. It gives only vague guidelines about reducing cow herd sizes, and reducing the number of dairy operations.

The NPS has a poor management record. Please consider that the commercial dairy and beef operations were supposed to be gone over thirty years ago. instead, the NPS has allowed those operations to increase in size, while deceptively labeling the modern industrial operations as "historic." For example, the McClure (I Ranch) and Kehoe (J Ranch) dairies were allowed, in the early 2000's, to build massive modernized "loafing barns," each of which is over 30,000 square feet in size. Also, the number of permitted livestock animals has increased, while the size of those individual animals also has increased (a modern "Holstein" cow is much larger, consumes much more feed, and produces much more milk and excrement than did her ancestors from several decades ago).

The "L7617" letter from the NPS talks about reduction in the number of dairies, due to the supposed closure of the McClure Dairy. If the NPS truly intends to keep the I Ranch dairy closed, why haven't they yet announced plans on demolition and disposal of the McClure loafing barn, which contains hundreds of tons of concrete?

Everybody knows that livestock operations are primary causes of global climate change. For-profit beef and dairy operations have no rightful place in a national park.

A 1998 NPS report recommended that the Tomales Point elk fence be removed, but the NPS has yet to act on that. Nor have they removed the barbed wire fences from the ranches, which restrict the native tule elk from natural migration. If past record is indicative of future behavior, the NPS needs to be checked and corrected.

Please, commissioners, do not give in to the commercial political interests that seemingly dictate modern NPS policy and operations.

-Jon

--  
Jonathan D. Spear  
1830 Ortega St.  
San Francisco, CA 94122  
USA

cell: 415-860-6170

## Agenda Item Th18a: CD-0006-20

Condition Compliance for Consistency Determination for 2020 General Management Plan Amendment for Point Reyes National Seashore and the North district of Golden Gate National Recreation Area.

On Earth Day, 2021, with a 5-4 vote the California Coastal Commission (CCC) conditionally concurred with the above-referenced consistency determination submitted by the National Park Service (NPS). While it was discouraging that the commission would vote in favor of continuation and extension of commercial operations shown to degrade land, pollute water, destroy sensitive habitats, diminish biodiversity and restrict public access, I was grateful to the CCC for bringing long overdue oversight to hold NPS accountable. For compliance with consistency determination NPS was required to submit for review, in April 2022, a first year version of water quality strategy and a Climate action plan consistent with local, state and National requirements. Predictably NPS demonstrated their lack of commitment to addressing the serious situation by asking for an extension. I am thankful to the CCC for refusing to grant this extension.

While I would like to urge the commissioners to revoke the concurrence as the only way preserve and protect the only National Seashore on the West coast, I would like present my concerns should the commission continue with the concurrence. Here I am responding to the March 24<sup>th</sup> NPS water quality and climate strategies, Please consider and advocate for requests outlined here.

- GMPA ROD has been modified to prohibit replacement of dairy leases when they cease operations or are unable to modernize manure management practices. Please add the condition that when dairy leases are terminated they should *not* be converted to beef or any diversification. Instead these ranches should be allowed to re-wild. Restoration of grazed land to its original state of coastal prairies and wilderness will not only meet both the water quality and climate action strategies, but also comply with the created intent of this National seashore.
- NPS had decades to fix the highly abnormal water pollution findings from their 2013 testing. Instead their solution has been to stop testing and wait till after the ROD is signed to “reinitiate” water testing, for which they still have not reported any data. Given that Point Reyes waters are most fecal contaminated in the state for over a decade, the commission should hold its concurrence until tangible results and positive outcomes are presented. Concurrence with only a water quality strategy is not “consistent to the maximum extent practicable” of the enforceable policies of the California Coastal program. Note that citizen groups have presented data to the commission and regional water boards, over similar duration, so this is technically feasible. Prior to concurrence, NPS should demonstrate that it has fixed the problems. This will hasten their commitment for a resolution and also highlight the likely scenario that the observed levels of water pollution cannot be mitigated with their proposed best management practices (BMPs). SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”. If standards are not met, all dairies should be removed not just reduced from six to 5 as proposed.

- With the proposed GMPA zoning framework, cattle will be excluded from priority water protection areas, to relatively flat areas away from waterways and wetlands. While this is highly encouraging and will allow riparian areas to heal, I would like to request that the NPS add the area adjacent to the Tomales Elk herd to the exclusion zone. This will resolve the long-standing issue of elk dying unable to access water during the frequent California droughts.
- NPS has not yet identified investments to meet the climate reality of reducing green house gas emissions. When this is developed and submitted for review, the public should be informed to identify if taxpayer funds are being used. The climate action strategies should be evaluated by experts outside the ranching and agriculture stakeholders to avoid conflict of interest and ensure that these are not greenwashing attempts like “Clean Coal”. So called “carbon farming” techniques are not proven to scale and methane digesters are not cost-effective. Experimental strategies should be explored in private ranches. Please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable. Public opinion is being disregarded, we need your help in getting heard. Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters especially in this consequential time. We do not have too much time to respond to the climate crisis and we cannot rely on the same processes, business practices and lobbying that has led to this crisis. Please stand with the people of the state of California and not private interests.

Radhika Srinivasan,  
Walnut Creek, CA

James Coda  
2009 Falcon Ridge Drive  
Petaluma, CA 94954

April 1, 2022

VIA EMAIL

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

Re: Coastal Commission Conditional Concurrence Regarding 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 (GMPA)

Dear California Coastal Commission:

After reading NPS's submission for the hearing, I have the following comments.

All NPS discussions are about "improving" water quality. What is legally required is not improving but complying. I see nothing in what the Coastal Commission is requiring or in what NPS is proposing that requires compliance. There should be a commitment to compliance with deadlines. NPS has allowed severe pollution for over 40 years. How long is the Coastal Commission going to allow it to continue?

What water monitoring has been done by NPS in water year 2022? If any has been done, where are the results? If none was done, why was this year ignored?

NPS claims BMPs like fencing, bridges over creeks and keeping lactating milk cows in free-stall barns (not all the 5 remaining dairies have free-stall barns) will solve the pollution problem. Some lactating cows are outside year-round. Even those that have free-stall barns are outside during the "grazing season" which is three to four months long. Dry dairy cows are outside for their two-month dry period and dairy heifers are always outside. Beef cows are outside 12 months a year as well. When these animals are outside, they are urinating and defecating on the ground and when it rains and there is runoff some of that manure will be washed into the creeks. Those BMPs won't stop that.

For the first time during the entire four-year planning process NPS has now come up with the idea of "seasonal grazing" to deal with manure on the ground. If you put the same number of animals on less acreage you wind up overgrazing the smaller area unless you import more hay to compensate because the smaller area won't sustain the same number of animals. The large amounts of hay currently



imported every year has resulted in a tremendous amount of non-native, noxious and invasive weed growth because NPS does not require imported hay to be “certified weed free hay” in PRNS and GGNRA. More hay will exacerbate the problem. Ironically, anyone who brings a horse into a national park must bring along “certified weed-free hay” for the horse. Plus, keeping cows off areas most likely to be the sources of manure getting into streams will require a great deal more fencing which causes problems for people and wildlife. Finally, “continuous grazing” is the norm in the Bay Area and across the country. Seasonal grazing is more expensive and more work and the ranchers will oppose it for those reasons.

The Park Service has owned the ranch lands for four decades or more. The Park Service should be asked whether any drainages in the monitoring plan are in compliance now for pathogens, nutrients and sediments.

For any drainages not in compliance now for pathogens, nutrients and sediments, the Park Service should be asked when will they be in compliance?

Sincerely,

s/James Coda

April 1, 2022

From: Elizabeth Dodge  
Berkeley, CA 94708  
To: California Coastal Commission 455 Market St, Suite 223  
San Francisco, Ca 94105- 2219  
Via email:  
[NorthCoast@coastal.ca.gov](mailto:NorthCoast@coastal.ca.gov)  
[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)

Re: Agenda Item Thursday 18a - CD-0006-20 (National Park Service, Marin Co.)

The National Park Service (NPS) on March 24, 2022, finally released its Water Quality Strategy and Climate Action Strategy for the California Coastal Commission as required by the conditional consistency determination of April 2021. I have not had the opportunity to review their plans in detail, but I offer the following preliminary comments for your consideration:

- 1) Any legitimate plan will begin with a clear statement of goals. This is lacking in both the NPS Climate Action Strategy and Water Quality Strategy.
  - Rather than beginning with a description of the target outcome, the Climate Action Strategy begins on page 1 with a description of “Changes to Preferred Alternative adopted in GMPA Record of Decision” and modifications for “further reductions in air quality impacts” without explaining what target air quality goals these reductions are intended to achieve. They discuss percent reductions in air contaminants on page 3, but not how these relate to global warming or whether they are adequate. The term “further reductions” is typical of NPS dissembling; the FEIS states that for their preferred alternative air quality would not be improved at all and “emissions from ranching would generally be the same type and intensity as described under existing conditions” (NPS GMPA FEIS page 222).
  - The Water Quality Strategy document also does not begin with a clear statement of goals - which should be to meet Federal and State water quality criteria especially for water contact recreation (REC-1), which is one of the main reasons visitors come to Point Reyes National Seashore. This should be the clearly stated basis for the rationale for monitoring and mitigation activities. In continued dissembling, the NPS claims that the REC-1 beneficial use “may set a higher bar than intended for existing uses” (Water Strategy plan, page 9). Whose “intention” are they referring to? Water contact recreation is popular at PRNS lagoons and beaches and local businesses offer kayaking and paddle boarding. If it is the NPS’ intention to assume visitors will not engage in water contact activities they should post signs forbidding it. Instead they hope that visitors who get sick will think it’s from something they ate rather than that dip they took at PRNS beaches.

- 2) The Water Quality plan needs to provide more details about who will conduct water quality monitoring and under what, preferably, independent professional supervision. The NPS at Point Reyes National Seashore has a long history of failing to regulate the beef and dairy operators who are driven by profits at the expense of public safety and environmental protection. The NPS does not regularly monitor the ranch operations, enforce regulations, or even punish violations until forced to do so by public outcry, adverse publicity, or regulatory agency action. Trustworthy, transparent procedures are needed for the PRNS NPS to win the public trust. If the NPS delegates water quality sampling to the ranchers everyone will wonder if they are filling the sample containers from their kitchen taps.
- 3) On page 3 of the Climate Action Strategy the NPS claims that changing the word “voluntary” to “mandatory” in Ranch Operating Agreements will “ensure intended improvements would occur”. This also strains credulity given the NPS’ historically feeble oversight of ranches.
- 4) On page 1 of the Water Quality plan the NPS says the Zoning Framework “will exclude cattle from water quality protection areas”. There is no oversight or enforcement mechanism identified. The NPS has historically relied on park visitors to report cows in creeks and lagoons and their response is to ask the ranchers to get the cows out of surface waters with no punishment for the violation.
- 5) Many portions of the NPS plan are deferred into the future or are vague.
  - The NPS states it is “not yet in a position to definitively identify investment and adjustments on dairies” (page 3) but they have had the responsibility to oversee these operations for over 60 years.
  - The NPS says the next version of the Water Quality Strategy will provide more details. The CCC should not rescind the conditional approval of the NPS GMPA until the NPS provides a full and complete strategic plan
- 6) The NPS describes closure of one dairy as part of its “strategy”. That is not a strategy – that was the decision one dairy operator to retire. Furthermore, the NPS offers no guarantee that the lease for that ranch will not be taken over by another rancher who will bring in more cattle. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore one of the most significant actions they can take would be rewriting the succession policy to permanently retire leases when ranchers no longer wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

- 7) The NPS plans focus almost exclusively on dairies and while dairy cows produce more manure than beef cows the production of manure by beef cows is not inconsequential. Scientific studies (<https://ag.umass.edu/crops-dairy-livestock-equine/fact-sheets/manure-inventory>), A 1,375 pound lactating cow produces 149 pounds of manure per day, and a 1,200 pound beef steer produces 90 pounds of manure per day. The General Management Plan Amendment Final Environmental Impact Statement (September 2020; Table 1: Permitted Use on Ranches,) the 2,425 animals on dairies at PRNS produce 95,215,145 pounds of manure annually and the 1,478 animals at beef operations produce 48,552,300 pounds of manure per year. The NPS may claim that beef cows produce half as much manure as dairies but that's still a lot of bacteria and contaminate-laden poop that gets spread around the landscape, discharged to surface waters, creating health risks for human and ecological receptors. The strategies to improve air and water quality need to address the reduction of all livestock on PRNS, not only dairy cows.
- 8) The Water Quality plan describes potential reductions in monitoring parameters or changes in sampling locations. Changes to the monitoring program should only be made with the review and approval of the CCC, otherwise this plan will be revised to allow the NPS to continue to ignore surface water contamination at PRNS.
- 9) Page 17 of the Water Quality plan states that dairy operations in at PRNS have been participating in a qualified group monitoring program to comply with the San Francisco Bay Regional Water Quality Control Board WDR for confined Animal Facilities and will be required to report those data to the NPS. This information should be made available to the NPS, the CCC and the public.

Dear Commissioners,

I am a Marin County resident and a frequent visitor to PRNS/GGNRA, a National Park on the California coast which allows 28,000 acres for private, cattle operations. The environmental and natural resource impact of cattle ranching on this public land is not only visible, but scientifically documented, and the impact continues to occur over and above the standards allowed in a coastal zone. I **urge** the Commission to revoke your approval of the GMPA, as the Water Quality Strategy and Climate Action Strategy will not align with the Coastal Act, nor align with what we must do to fight the climate crisis.

As documented in the Voeller 2021 publication and NPS' Record of Decision, the NPS implemented 30 best management practices (BMPs) and 170 management activities to address water quality issues, e.g., more fencing to keep cattle out of waterways, water trough placement away from riparian areas, allowance of 2 new loafing barns, harden cattle crossings.

One loafing barn constructed in 2004 on I Ranch is a 30,000 sq foot concrete structure on the rolling hills along the Pacific Ocean (photos below). I Ranch is located above the Abbotts watershed, and per water quality data published in January 2021, the following exceedances were documented: *E.coli* limits by a factor of 20 and enterococci limits by a factor of 60. These data are aligned to water quality data the NPS published up until 2013. The water quality data highlights the fact that this BMP, a 30,000 sq foot concrete structure, had no to minimal benefit protecting water quality from cattle operations.



Aerial photo of I Ranch, with loafing barn on foothills near Pacific Ocean.



Photo from Pacific coast/west side of I Ranch's modern loafing barn, November 2021

The McClure dairy continues to lease I Ranch but closed dairy operations mid-2021 due to natural spring that ran dry (this dairy used over 20,000 gallons of water/day to clean loafing barn and for dairy operations), an organic milk glut, and the rancher's retirement. The rancher no longer uses this loafing barn due the closure of the dairy operations, however the public has to see this monstrosity on the landscape when visiting PRNS.

Another 36,000 sq ft loafing barn was allowed to be constructed on J Ranch (Kehoe Dairy), also to reduce pollution in PRNS waterways (Kehoe Creek/Kehoe Lagoon – all drain into the Pacific Ocean with heavy rains). Water quality data published in January 2021 state Kehoe Creek had 30 times the allowable limit for standards for *E.coli*, and Kehoe Lagoon exceeded *E.coli* limits by a factor of 40 and exceeded enterococci limits by a factor of 300.

How many more modern, non-historic, loafing barns will the CCC and NPS allow, which destroys the natural landscape of our California coastline and National Park, and without benefit to water quality?

Over 350 miles of fence line exists in the National Seashore, barbed wire, electric, etc – most of which are not wildlife friendly, nor friendly to the public. Fences keep cattle within the leased parcel and also away from streams, ponds and riparian areas (a BMP). However, no matter where one goes to hike on these public lands, impact from cattle are evident.



Photos below are from a hike through Home Ranch (beef ranching) on Estero trail, along Drakes Estero, out to Sunset Beach.



Beef cattle on the bluffs above Drakes Estero, Feb2022.

Home Ranch is a 2200 acre leased parcel and cattle have access to ponds, beaches, trails - all which will drain into Drakes Estero, and the Pacific Ocean. Drakes Estero should be protected from environmental impact caused by cattle operations in this coastal zone.



Cattle impact to Estero trail. Note poor quality of water. Due to topography, water drains to Drakes Estero.





Cattle on public trail, Sunset Beach trail to Sunset Beach, Feb 2022.



Pond on Home Ranch, along Estero Trail. Cattle erosion above, and always cattle access to pond, Feb 2022



On February 11, 2022, I arrived at Drakes Estero parking lot for a morning of paddle boarding on the Estero, to find cattle, cattle manure in the parking lot. Cattle are not allowed in this area, as is a public launch site with access coastal waters, where marine/aquatic-life exists and should be protected.



Cattle in Drakes Estero Parking lot, from N Ranch. Feb 2022.



Drakes Estero parking lot, Feb 2022.

Toxic algae blooms are being documented around the US, caused from high nitrogen levels in waterways due to cattle operations. This is occurring in PRNS, however the NPS Water Quality Strategy does not include a plan to monitor these toxic blooms to assess the impact. In addition, there is no plan to monitor Benthic Macroinvertebrates which are impacted also by these polluted waters, due to significant high levels of ammonia, nitrogen, and bacteria. The Water Quality Strategy, with plans to implement more BMPs and management activities which may provide little to no benefit, while not assessing impact to aquatic life, is unacceptable.

Not only are the tenant cattle operations polluting our waterways, but they are depleting the ground water as well. During the 2021 drought season, springs on tenant parcels ran dry (McClure/I ranch) which is one of the reasons why the McClure Dairy sold the cattle supporting his dairy operation. In addition, access to springs and water were not available for 2 other tenants therefore the NPS allowed tenant ranchers to pump water from 2 key streams: at North Kehoe Creek by the J Ranch tenants for their dairy operations, and also at upper east Schooner Creek for the tenants at N and Home Ranches (beef operations). Both of these waterways flow into the

coastal zone, and into the Pacific Ocean. These issues are a violation of the Coastal Management program where ground water and surface waters should not be impacted.

There are 30 BMPs and 170 management activities implemented over last 20 years to address water pollution in PRNS/GGNRA, however per the water quality data now available, these BMPs do not address the issue. I believe, with both beef and dairy operations on our public land on the coast of California, no amount of best management practices will meet the expectations of water quality standards, and air pollution standards, unless cattle are reduced to minimal numbers (which is not financially practical for the ranchers cattle businesses), or all cattle operations are removed.

The cattle industry, just as oil, gas and coal industries, pollutes water and air, uses extraordinary amounts of water to sustain their operations, and impacts biodiversity at the plant and animal level. The landscape in PRNS/GGNRA is of rolling hills, watersheds, and with over 5000 cattle on 1/3 of the National Park, therefore the cattle will continue to negatively impact water quality and natural resources in this coastal zone.

How much is enough? How many more loafing barns, fence lines will be allowed to attempt to address the significant pollution in PRNS?

I respectfully request the Commission to make a science-based decision, and withdraw your conditional approval of the GMPA, as we must start now to protect our environment and natural resources in our National Park.

Thank you,

Kelli Petersen

Mill Valley, CA 94941

Julia Stalker  
520 Shrader St  
San Francisco, CA 94117

California Coastal Commission  
455 Market Street, Suite 223  
San Francisco, CA 94105-2219

April 1, 2022

RE: Condition Compliance Consideration for Consistency Determination No. CD-0006-20 (Th18a) by the California Coastal Commission for the Point Reyes National Seashore General Management Plan Amendment.

Dear Commissioners:

Thank you for opposing the requested extension of the required Water Quality and Climate Action Strategy Plans by the National Park Service (NPS). These conditions of the concurrence of the 2020 NPS General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA) were adopted by the Commission and agreed upon by NPS with a deadline of no more than 12 months from April 22, 2021. On April 7, 2022 you will determine whether or not to approve of the Climate Action and Water Quality Strategies that the NPS has submitted.

I do not have enough information to comment on the proposed Climate Action Strategy.

I have read the proposed Water Quality Strategy for the GMPA for PRNS and northern district GGNRA (first version) and I do not believe that this Strategy is thorough, comprehensive and transparent enough for your approval. Some of my questions and concerns are listed below.

**A Need for a More Comprehensive and Effective Monitoring Strategy:**

Although the NPS has outlined some management actions that may help reduce the harmful impacts to the natural resources of the Seashore and Coastal Zone and state to have reinstated monthly monitoring at a subset of previously assessed coastal watershed stations in December of 2021, much of the NPS Water Quality Strategy is relying on existing Water Board CAF waiver requirements and agency standards.

Clearly, based on past and recent water quality testing; past and current BMPs, Water Board waiver requirements (WDR) and agency standards have not been effective in preventing harmful pollutants from entering the waterways and protected coastal and estuarine areas of PRNS.



The strategy of incorporating the temporary, short-term assessment stations into the water quality monitoring plan to better determine where the sources of water pollution may be found is an encouraging step, but why limit this monitoring to a short-term basis? Why not sample at these stations regularly and long term to have a constant indication of what the water quality is at (or coming from) any given ranch throughout the year and through several years? Also, are all potential 'toxinshed' areas in the Park covered in these assessment and long term monitoring stations? Why are there no stations on the southwest (ocean) side of the peninsula?

#### **A Need for More Clarity of Specifics:**

The Water Quality Strategy Plan is quite vague in several areas and reads more like a brainstorm than a strategic plan with identified specifics related to the details of the plans, monitoring protocols, timelines, etc.. I understand that this is the shorter-term version of the Strategy but believe that specific management actions and specific timelines for implementation of many of the actions in the Strategy need to be better identified and incorporated into the Strategy.

For example, The Strategy states that the *NPS would continue to select specific watersheds or ranches for these (assessment) efforts on a rotating, priority basis.* More specifics are needed on what the parameters would be for selecting and prioritizing these specific monitoring sites.

#### **A Need for More Transparency:**

It is extremely difficult to obtain current data on water quality monitoring at PRNS from San Francisco Regional Water Quality Control Board (SFRWQCB), County of Marin or NPS. Both the NPS and the SFRWQCB are public agencies and have an obligation to make public information available but neither agency is willing to provide the water quality sample data from the past nine years or an explanation as to why.

It is both frustrating and unacceptable that the public can not easily access all current existing water quality data that potentially affects the health of the public and of the natural resources on publicly-owned lands.

Reporting of **ALL** water quality monitoring results should be **posted publicly** in real time (or as close to real time as possible) – not annually.

#### **A Need for More Resource Protections:**

Monitoring should be for factors that can affect native flora and fauna - which are equally important as the factors that affect humans - in a national park and coastal zone where several protections of the natural resources are required.

Because the livestock within the Park are in such close proximity to federally protected marine mammals, birds and other native wildlife species, monitoring of any pathogens known to be transmittable from cattle and other livestock to these other species (including people) should be conducted regularly in addition to the monitoring for standard criteria.

**A Need for Real and Enforced Consequences for Lease and/or ROA Violations:**

Consequences to the ranch lessees for noncompliance of required conditions and/or actions need to be made clear and enforced strictly. Consequences of non-compliance is not stated in the Strategy and should be as a part of the overall strategy to ensure that the management practices for keeping the land and waterways clean are successful. The recent discovery and public disclosure of a large dump site on one ranch property and the bulldozing of critical streambed habitat on another within the Seashore with no apparent consequences to the lease holders is unacceptable. Any future violations need to have well defined, publicly disclosed consequences established and swiftly enforced.

I know that several of you are very experienced with water quality monitoring strategies and protocols and that all of you care deeply about protecting the amazing natural resources of the California Coastal Zone.

I believe that ranching operations and natural, protected resources are not compatible and that it is a very difficult, if not impossible task to find a way for them to co-exist. I trust that you will make the right decision on whether or not these Strategies are clearly defined and adequate for managing the ranchlands at PRNS in a way that also protects the natural resources to the fullest extent possible, and that if not, you will reject the Strategies and rescind the Consistency Determination for the PRNS GMPA.

Thank you for all that you do!

Sincerely,  
Julia Stalker



**Mark A. Walsh**  
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California Coastal Commission  
455 Market Street, Suite 223  
San Francisco, CA 94105-2219

March 31, 2022  
[NorthCoast@coastal.ca.gov](mailto:NorthCoast@coastal.ca.gov)

Re: Thursday April 7, 2022 California Coastal Commission (CCC) Hearing  
*Agenda Item #TH18a, National Park Service Consistency Determination No. CD-0006-20*  
*Public Request to Revoke CCC's April 2021 Conditional Concurrence from National Park Service*

Dear Commissioners,

Thank you for your persistence to hold accountable and rigorously honest both the National Park Service (NPS) and Point Reyes National Seashore (PRNS, the Seashore) executive, senior, and mid-level officials. The concerned people of California, and indeed the nation and world, watch each of your current actions addressing this ongoing environmental debacle of the past nearly 60 years.

By now—given the past 12 months of PRNS officials' inaction, excuses, minimizing, and delays—certainly the CCC's collective eyes must be open to the sustained misdirection, double-speak, false assurances, and terrible malfeasance record of these PRNS officials for the past decades. Rather than honor and enforce the most basic of NPS policy north stars and baselines, PRNS officials have made a mockery of nearly every federal and state agency trying to overcome the profit influence of about 20 rancher families holding forth on the Seashore—and in the process, literally destroying the lands, waters, air, habitat, wildlife, and biodiversity of what should be a global model for biodiversity and climate protection.

You, individually and collectively, have a critical opportunity to turn this cart off its trammelled course, and in the process, to establish clear precedents and a strong message for how the State of California enforces its environmental protections and record—even upon lackadaisical, indifferent, hocus-pocus federal park officials.

PRNS officials, starting with Superintendent Craig Kenkel and his well-known direct reports, assured you in April 2021 that they took your and the public's concerns and sometimes outrage seriously. That they would attack issues of the Seashore's ignominious water quality, challenged wildlife and habitat, and burgeoning climate effects with forthright attention and diligence. Nearly upon the April 7 CCC hearing, these officials attempted to (once again more) beg off and delay action, let alone meaningful action.

You, the CCC commissioners, must now recognize this as the dilettante Standard Practice of the PRNS—to thumb their nose at all who try to do right for the Seashore’s health and well-being—but not at the few handfuls of beef and dairy cattle ranchers who hold sway over them, as well as over key power and money players at the local, state, and federal levels.

You, the CCC commissioners and your staff, have received many, many scientific, technical, and legal arguments why your April 2021 Provisional Concurrence to NPS Consistency Determination No. CD-0006-20 must be revoked forthwith, with obvious cause from its unserious approach most notably by PRNS executives and staff. The NPS and PRNS inaction and sweet talk of the past 12 months—including their thrown-together One Year water quality and climate amelioration plan— is just more scrap from a greater whole cloth of the inept, intentional, or weird-mesh-of-both official record going back decades.

From me, I’ll suggest this:

Go out to Point Reyes National Seashore, drive out Sir Francis Drake Boulevard or Pierce Point Road. Get out, crawl over/through/under some of the ~350 miles of barbed wire fence (an invention of World War I), stroll through the desolation of liquefied manure-covered fields, step carefully across or through cow feces stenching creeks, take in the smells and visuals. Note the ramshackle, derelict cattle ranch buildings, especially the documented rat-infested workers’ huts. Historic, you say? Say hi to the calves weaned too soon from cow mothers and placed in straightjacket plastic hovels. Oh, but watch out for regular threatening verbal assaults from aggressive ranchers (males and females inclusive) out on the open spaces, racing up on ATVs to brake-slam right in front of you, screaming at you to leave “their” land, which in fact belongs to the American public, and the wildlife trying to just have a natural, unburdened, un-poisoned life there. Try that out on J Ranch, and try to talk calmly to the spewing Kehoe Brothers Trio. Stop by all the manure ponds (seen and hidden), see ‘em seep and drain down hillside cuts to the various branches of Kehoe, Schooner, Abbott’s, Home, and other Seashore nitrogen-choked creeks, lagoons, estuaries, to beaches, bays, and coastal ocean waters. Admire the water fowl, river otters, bobcats, coyote having a make-do life by ag biz/ranch-runoff waterways teeming with who knows what. Go hike the Tule Elk Pen with the 8-foot tall fence, and come to no other conclusion than ranchers want their money profit and government subsidies from your and my taxes—Tule Elk be damned, to avoid death by thirst or starvation, standing forlornly at the miles-long fence-line, if not trapped in fly-infested and scavenger-frequented drying mud pits, aching to free-roam for water and nutrition across the Seashore.

Now, imagine an indigenous population living in concert with the natural world before European incursions and occupations, with native coastal prairie, clean waters, soils, air, and a multitude of wildlife including healthy and in-balance black bear, pronghorn sheep, Tule Elk, cougar, bobcat, river otter, coyote, badger, weasel and millions of flyway and resident birds with their biodiversity support troupes of insects, butterflies, amphibians, reptiles, crustaceans, shellfish, and myriads of others.

The goal of a National Seashore is not to protect or support or coddle and appease or subsidize or excuse private, for-profit, industrial-level beef and dairy cattle businesses with missile defense systems-sized compounds. Knowing your history, these handfuls of rancher families were paid ~\$400 million in the first decades of the 1962 Seashore's founding *to vacate the land and waters there*. Through incessant-yet-inaccurate-even-untruthful storytelling and special interest lobbying, they've managed to hang on in a place that deserves to be what it was founded for – a National Seashore where the natural world is honored, restored, protected, and shared among humans and wildlife for years to come. Even in the dire climate challenge we face, we must aspire to higher and better goals than perpetuating a myth and way of life that contributes greatly to our earthly destruction.

Finally, dear commissioners, I ask of these handfuls of beef and dairy cattle businesses who cry poor, but who took their government tax dollar millions decades ago, bought ranchlands outside the Seashore, and thrive as some of the wealthiest and extensive landholders in Marin and Sonoma counties—Have you no shame? At long last, When will you leave as was intended in the 1962 founding legislation and in the intent of all those many then and now who envision a Yellowstone for the Pacific? How much BS will you and NPS/PRNS continue to shovel deep on us and the Seashore?

Therefore,

1. I respectfully request that the California Coastal Commission, in review of April 7, 2022 Agenda Item #TH18a—National Park Service Consistency Determination No. CD-0006-20, revoke for obvious cause and dereliction of intent and action the Provisional Concurrence of April 2021.
2. Further, due to obvious and potentially illegal conflicts of interest, I respectfully request the voluntary or assigned recusal of Commissioner Katie Rice (who has expressed and acted with bias aforethought, including multiple undisclosed ex parte communications on these and other PRNS matters being considered by the CCC) – from participation and vote on April 7, 2022 Agenda Item #TH18a, National Park Service Consistency Determination No. CD-0006-20.

For clarity of your thought, let's approach it this way: We only have One Chance now to get this right.

Thank you, each Commissioner, for your serious consideration and agreement to these requests, and for standing up for the California Coast as is your mandate, regardless of entity engaged.

Sincerely,

Mark A. Walsh

Social Responsibility As Best Practice™

Writer, Editor, Analyst, Advocate

**From:** [Barbara Salzman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** April 7 Pt;. Reyes Seashore Agenda Item  
**Date:** Wednesday, March 23, 2022 9:33:34 PM

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Please email or send (I left a phone message) the Pt. Reyes Seashore submittal and staff recommendations  
Also, clarify whether the April 7 meeting is planned to be information only or an action action item?

Thank you  
Barbara Salzman  
Marin Audubon Society

**From:** [jackie mann](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** CD-0006-20 National Park Service Water Quality Strategy and Climate Action Plan for Point Reyes National Seashore  
**Date:** Thursday, March 31, 2022 11:52:57 PM

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Point Reyes National Seashore holds a special place in my heart. I am a wildlife ecologist and have been hiking and wildlife watching at the Seashore for fifty years.

I support the CCC in bringing oversight to the situation at Pt. Reyes National and holding the NPS accountable with the concurrence. Thank you for refusing to grant an extension to the NPS.

Preferably the commissioners could revoke the concurrence and deny ranching activities in order to preserve and protect the only National Seashore on the West coast.

Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. It is time to hold them accountable!

Public opinion has been disregarded, we need your help. Your strong position on this federal consistency determination will send a powerful message about preserving a natural resource. Please stand with the people of the state of California and not private interests.

Also, it is vital that the ranchers are ineligible for LCFC's from producing biogas. The ranches exist on public land. They should have no incentives to expand herds or profit at the expense of wildlife and habitat degradation. They should not be permitted to change business models nor diversify in a carbon intensive manner, ie anything that has to do with more livestock. The goal should be to phase out, to "decommission" dairies on public lands.

Thank you,  
Jackie Garcia Mann  
with 350 Contra Costa

**From:** [JULIE PHILLIPS](#)  
**To:** [Coastal Point Reyes Management Plan](#); [Energy@Coastal](#)  
**Subject:** CD-0006-20 NPS, Marin County, Public Comment April 2022 Agenda Item  
**Date:** Monday, March 21, 2022 12:30:27 PM

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Dear Coastal Commissioners:

Please hold the National Park Service accountable for the decades of neglect by allowing the ranchers to pollute and destroy the native habitat of Point Reyes National Seashore (PRNS) as well as cause extreme water pollution to the coastal areas (including creeks, wetlands, beaches in this critical watershed) within and adjacent to the park. This is a serious threat to local water quality as well as contributing to the Climate Crisis locally through the continuous greenhouse gas emissions generated due to the cattle operations and loss of carbon sequestering native plants. No extension of time for the "required and agreed upon reports to the CCC", which are now nearly a year delinquent, is going to resolve these issues and the NPS leadership including the PRNS management know this!

The mission of the National Park System which includes Point Reyes National Seashore (PRNS) 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.**" The National Parks are the "most protected lands on Earth" and are categorized as "Restricted-Use Lands". Thus our National Parks must meet the highest standards of protection and oversight by the Federal Government including protecting our California Coastal Zone!

This mandatory mission has clearly been violated for decades at PRNS by the lack of oversight of the ranchers, lack of enforcement of EPA regulations, and little if any management and protection of the native landscape, coastal waters and native wildlife by park management and staff.

It is clear to the public, scientists, environmental advocates and leaders, that 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. 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 and an extension of time. There are no practices which can "mitigate" the serious environmental damages to the local land and coastal ecosystem and our climate, and this is why the NPS has not completed the mandatory reports to address water pollution and climate impacts caused by the cattle operations.

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.

Respectfully submitted,

Julie Phillips

Tule Elk Biologist & Environmental Scientist/Educator

Email: [tuleelk@comcast.net](mailto:tuleelk@comcast.net)

**From:** [Amy Allen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** comments for water quality in Pt Reyes  
**Date:** Saturday, March 19, 2022 3:18:59 PM

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Hello

I would like to voice my concerns that polluting cattle are allowed on our National Seashore where their feces clearly wash into our waterways and affect the wildlife in the streams and the ocean. We must prioritize our land and water over privately owned ranches.

Thank you for caring.

Amy Allen, DVM, Diplomate ACVIM  
San Rafael, CA  
415-272-8982



**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Point Reyes Water Quality  
**Date:** Friday, April 1, 2022 2:11:17 PM

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**From:** Kay Sibary <kays@iname.com>  
**Sent:** Friday, April 1, 2022 2:10 PM  
**To:** NorthCoast@Coastal <NorthCoast@coastal.ca.gov>  
**Subject:** Point Reyes Water Quality

I am a resident of the California Bay Area and am very disappointed in what I feel is a failure to adequately test, manage and protect the water quality of the Point Reyes National Seashore.

The CCC needs to enforce and implement a strong, comprehensive, science-based water quality testing plan with enforcement protocols that recognize the current climate context, as well as the risks of continued and increased use of these lands for commercial purposes.

Requests for permission to delay such plans by PRNS throw serious doubt on their level of commitment to this issue. The CCC is not alone in its concern for the abysmally poor quality of testing and enforcement thus far.

Please do the right thing. Protect the resource and environment for which you have been chartered. For all of us, and for our children.

Kay Sibary  
8 Southwood Dr.  
Orinda CA 94563

**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Pt. Reyes Water Quality item 18aCD-0006-20  
**Date:** Friday, April 1, 2022 4:34:48 PM

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**From:** Diana Muhanoff <dianamuhanoff@yahoo.com>  
**Sent:** Friday, April 1, 2022 4:34 PM  
**To:** NorthCoast@Coastal <NorthCoast@coastal.ca.gov>  
**Subject:** Pt. Reyes Water Quality item 18aCD-0006-20

Written comment for CCC board review before April 7th 2022 meeting.

Dear commissioners,

For the safety of the Point Reyes National Seashore water quality testing and protocols must be enforced. This is necessary to improve the seashore we love and for all of us to enjoy.

Regards,  
Mrs. Diana Muhanoff  
[Sent from Yahoo Mail on Android](#)

**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Public Comment on PRNS Water quality @ CCC Meeting April 1,2022  
**Date:** Friday, April 1, 2022 2:43:47 PM

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**From:** Morganne Tree Newson <morganne77@gmail.com>  
**Sent:** Friday, April 1, 2022 2:43 PM  
**To:** NorthCoast@Coastal <NorthCoast@coastal.ca.gov>  
**Subject:** Public Comment on PRNS Water quality @ CCC Meeting April 1,2022

To : CCC  
From : A M Newson  
Re: suffering Elk

It is beyond time to terminate the leases for dairy farming at Point Reyes National Seashore.

What hope is there for the future of our Planet if in environmentally aware area such as Northern California

- A native species - the tulle elk are decimated to bring in long suffering cows for a dubious & subsidized profit in a cruel

Business - the Dairy industry. Why starve & trap & deprive the Tule elk of water & free range & healthy food?

For what? A dieing business? Who wants to drive to Point Reyes & see parched cattle in dry fields & maybe an occasional view of

A few straggly elk foraging in their limited grazing grounds. How heartless are we human to let this continue?

We humans would love access to nature & the ocean without being exposed to obvious & needless suffering.

Please manage Point Reyes National Park with more compassion & wisdom & care for the natural world.

Sincerely

A. M Newson.

48p Gate 5 Road

**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting  
**Date:** Friday, April 1, 2022 5:08:21 PM

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**From:** Elizabeth Kay Fife <[fife@usc.edu](mailto:fife@usc.edu)>  
**Sent:** Friday, April 1, 2022 4:54 PM  
**To:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal) <[NorthCoast@coastal.ca.gov](mailto:NorthCoast@coastal.ca.gov)>  
**Subject:** Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

Dear Coastal Commissioners,

It is unacceptable that in the 60 years of the Seashore's existence, efforts towards water quality management are essentially non-existent. Water quality enforcement and testing procedures need to be put in place to safeguard California's environment and the biodiversity of this area in the face of climate change. This seems like the minimum that can be done in the face of the General Management Plan Amendment which apparently will extend, and in fact expand for-profit cattle-ranching businesses in our state's national seashore. We understand that the cattle rancher's have received advantageous land leases covering one-third of the Seashore's territory--despite widespread public dissent. To allow private interests to profit and to take priority over the public interest demonstrates a failure of governance. Please do what is possible to mitigate the environmental damage of the Big Ag's intrusion into the Point Reyes National Seashore and in the near term remedy the poor oversight that has affected not only water quality, but the destruction of grasslands and wildlife (the Tule Elk). We urge the Coastal Commission to review this situation in its totality and take action to properly protect the Point Reyes National Seashore.

Thank you for your careful consideration of this important and unique California resource.

Best Regards,  
Elizabeth Fife  
Kay Fife  
David Sawcer

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Elizabeth Fife, Ph.D.  
Associate Professor, Technical Communication Practice  
Viterbi School of Engineering, OHE 104  
University of Southern California  
Los Angeles, CA 90089  
[fife@usc.edu](mailto:fife@usc.edu)

**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting  
**Date:** Friday, April 1, 2022 2:03:40 PM

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

From: Theodore Watson <theo.watson@gmail.com>  
Sent: Friday, April 1, 2022 1:59 PM  
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>  
Subject: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

Hi,

I am a Petaluma resident and an avid visitor to Point Reyes National Seashore.  
My daughter often swims at the beaches on the Tomales Bay side and we go hiking there almost every weekend.

It is so disturbing to me how much of the park is designated for cattle, especially considering the ecological importance of the coast here for migrating animals, Seals, Whales, Fish, Rays etc. Ideally the only real solution is that the commercial dairy operations should be rewilded and restored back to its original landscape ( the reason NPS bought the land in the first place ).

At the very least I think we should hold NPS accountable for serious and regular water quality monitoring and if they try and delay this any further CCC should remove their support for the NPS plan.

Protecting the water for the public and their children as well as the delicate marine ecosystem that surrounds Point Reyes is one of the most important jobs of the CCC.

Please don't let NPS delay water quality measurement any further.

Thank you!  
Theodore Watson

**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Public Comment on PRNS Water Quality for April 7, 2022  
**Date:** Friday, April 1, 2022 4:42:54 PM

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**From:** Maximilienne Ewalt <maxewalt@gmail.com>  
**Sent:** Friday, April 1, 2022 4:41 PM  
**To:** NorthCoast@Coastal <NorthCoast@coastal.ca.gov>  
**Subject:** Re: Public Comment on PRNS Water Quality for April 7, 2022

I would also like to know from the CCC members, what they consider when evaluating improved water quality. I want to know what the results are and what should they be in order to allow continued ranching in the PRNS.

On Fri, Apr 1, 2022 at 4:36 PM Maximilienne Ewalt <[maxewalt@gmail.com](mailto:maxewalt@gmail.com)> wrote:

Dear CCC Board Members;

I urge you to stand firm on your demand to PRNS during the public hearing on April 21, 2021, to hold Superintendent Craig Kenkel accountable for his stated commitment to provide the CCC in one year with written, comprehensive, science-based water quality testing and enforcement protocols in a climate context, in one year. That time has arrived.

At that meeting, CCC board members expressed grave concerns about the lack of water quality testing and enforcement by the National Park Service (NPS) and PRNS on the Seashore's extensive private ranch lease holdings since the last active and limited efforts in 2013. The CCC's slim and disappointing 5-4 approval of the PRNS GMPA pivoted on Kenkel's commitment. Don't let him get away with delay tactics. Show the public you stand by your word. If the water quality has not improved by a substantial amount since the last test results the CCC was aware, or if they continue to fight for delays in the testing, do not allow the GMPA to move forward.

Water quality experts indicate such a report requires far less time than one year to produce. It's shocking there is little appreciable water quality management already in place after nearly 60 years of the Seashore's existence—given the long-established climate and biodiversity crises. To that point, and as you may know, more than one third of the 445 tule elk, a native and endemic species fenced in at Tomales Point died in 2021 due to drought. Activists forced the PRNS to supply drinking water to the tule elk in the preserve after hundreds of volunteers hand-carried 300 gallons of water hiking several miles to fill a dried out watering hole. These elk are fenced in and unable to search for water elsewhere. The GMPA allows for the killing of more elk in Point Reyes. As some members of the CCC stated 1 year ago, the PRNS is doing a dismal job of caring for its native wildlife and its waters. The GMPA approved by the CCC last year rewards the Ranches by allowing them to pollute our public and scenic waters and destroy wildlife. They need to do much better for our National Seashore. They've had enough time.

Please hold Superintendent Kenkel to his word, at the very least.

Thank you,

Maximilienne Ewalt,  
Public Citizen in SF and outdoor enthusiast.

PS. I plan to sign up to voice my concern at this next meeting. Last year, I did the same and sadly I was never called on to speak. I hope that doesn't happen this time.

**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting  
**Date:** Friday, April 1, 2022 4:31:33 PM

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

From: Bear McGuinness <[bear.mcguinness@gmail.com](mailto:bear.mcguinness@gmail.com)>  
Sent: Friday, April 1, 2022 4:17 PM  
To: [NorthCoast@Coastal](mailto:NorthCoast@Coastal) <[NorthCoast@coastal.ca.gov](mailto:NorthCoast@coastal.ca.gov)>  
Subject: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

Thank you for reading my comment.

I'm a longtime park volunteer and Point Reyes local, and I cannot understand why the park doesn't have a policy of regularly testing water quality in the park. I also don't understand why, with the pressure to come up with a simple strategy, the park hasn't yet done so. There are lots of cattle ranches here, and the cows are obviously pooping all over. I've even seen cow pats floating in Tomales Bay. This reluctance to regularly test the water quality of our local streams and bay makes the park look like it's hiding something. I understand that funding might be an issue. Maybe paying for an unaffiliated, unbiased agency to test the water should be part of any contract that ranchers sign. After all they're saving a great deal of money by running their private businesses on our public land. If the ranchers and park service have nothing to hide, then surely they won't mind both testing the water quality and sharing the results with the public. The health and safety of not just our environment but also the people who live and visit here should matter enough for water quality testing to be a priority, especially in this time of increasing aridification.

Thank you!  
CB McGuinness  
Point Reyes Station

Sent from my iPad



**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting  
**Date:** Friday, April 1, 2022 3:03:44 PM

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**From:** Brian <brian@brianacree.com>  
**Sent:** Friday, April 1, 2022 3:02 PM  
**To:** NorthCoast@Coastal <NorthCoast@coastal.ca.gov>  
**Subject:** Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

Dear Coastal Commission Members,

It is disappointing that we are still allowing private cattle grazing at the Point Reyes National Seashore nearly a century after the practice was supposed to stop and the land was to be turned over to the public. It is even more disappointing that our government is planning to allow that to continue for another 20 years, benefitting a few individuals at the cost of the public's right to enjoy public land, and at the cost of the wildlife and natural resources of the park. Yet here we are. Again.

It is even more disappointing that the Commission seems intent on allowing this to continue without a water quality monitoring plan in place, and frankly it's bizarre that this private industry has been allowed to pollute the park unmonitored for as long as it has. It speaks volumes about the lack of planning on the part of the park service, and suggests that this continued give away of public resources is being driven by the worst of our politics. If the continued leasing of public park land to private enterprise was in the public interest, if it was even remotely ecologically defensible, agencies wouldn't be dragging their feet for as long as they have to do the testing and monitoring that would prove it

It's time to put a stop to this ugly spectacle. It's time to vote against giving away public resources to benefit a few corporations. It's time to vote to protect the public interest and the ecological values of the seashore.

Brian Acree

**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Public Comment on PRNS Water Quality for April 7 CCC Meeting  
**Date:** Thursday, March 31, 2022 3:08:57 PM

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**From:** Cynthia Abbott <cabbot77@gmail.com>  
**Sent:** Wednesday, March 30, 2022 9:36 PM  
**To:** NorthCoast@Coastal <NorthCoast@coastal.ca.gov>  
**Subject:** Public Comment on PRNS Water Quality for April 7 CCC Meeting

Dear Commissioners,

Thank you for holding the National Park Service accountable to the conditions of your 2021 ruling on federal consistency at Point Reyes National Seashore.

The dairies and ranches on PRNS continue to pollute the creeks, wetlands and beaches. As you and I know all too well, cows pollute. We are limiting the elk numbers to hundreds to be "sustainable" so why do we allow 10 times the number of privately owned cows?

Please do what you can to end this clearly inconsistent and destructive use of our public lands.

Here we are entering another year of drought and with the urgency of the climate crisis we need our public lands restored to their natural habitat now. The public lands should be for wildlife and the public should have full access to the PRNS for the opportunity to experience the beauty of nature and our coast. Not forced to drive by miles of fenced off public lands for a few polluting commercial ranches.

Please retract your provisional approval of the NPS plan. The ranchers have over extended their stay and have had plenty of time to prove they can ranch while protecting our waterways. Sadly, they have not and the environment is becoming more degraded at this urgent time where every action needs to be toward restoration.

Thank you,

Cynthia Abbott

**From:** [Kraemer, Melissa@Coastal](mailto:Kraemer.Melissa@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Public Comment on PRNS Water Quality for April 7 CCC Meeting (or similar) Submit Comment  
**Date:** Tuesday, March 29, 2022 7:06:10 AM

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**From:** Lonna Richmond <[lonnajean@gmail.com](mailto:lonnajean@gmail.com)>  
**Sent:** Sunday, March 27, 2022 8:03 PM  
**To:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal) <[NorthCoast@coastal.ca.gov](mailto:NorthCoast@coastal.ca.gov)>  
**Subject:** Public Comment on PRNS Water Quality for April 7 CCC Meeting (or similar) Submit Comment

hi, i i will be writing a letter this week for submission to the CCC

thanks for organizing this, mark.

lonna

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**From:** [Kraemer, Melissa@Coastal](mailto:Kraemer.Melissa@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman.Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel.Cassidy@Coastal)  
**Subject:** FW: Public Comment on PRNS Water Quality for April 7 CCC  
**Date:** Tuesday, March 29, 2022 7:00:43 AM

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**From:** Amy Allen <amyntrip@sbcglobal.net>  
**Sent:** Monday, March 28, 2022 9:34 PM  
**To:** NorthCoast@Coastal <NorthCoast@coastal.ca.gov>  
**Subject:** Public Comment on PRNS Water Quality for April 7 CCC

Dear Commissioners,

Thank you for taking time to read my thoughts regarding the Pt Reyes National Seashore.

As you and I know all too well, cows pollute. And not a small amount. How can 2,425 cows in a National Park make any sense?! We are limiting the elk numbers to hundreds to be "sustainable" so why do we allow 10 times the number of privately owned cows? Please be on the right side of history and do what you can to end this clearly inconsistent and destructive use of our public lands. Spreading cow feces onto the lands and expecting them not to run off into the waters is ludicrous. Of course the waters in this area are full of coliform bacteria and other fecal contaminants.

And this is clearly why the NPS is reluctant (negligent?) in testing the waters. Hold them accountable and make a tough but correct decision to protect our beloved National Seashore.

I do love seeing the "prohibit replacement of dairy operations if additional dairies close" as the closure of dairies is

is inevitable with decreased demand and water shortages.

Please retract your provisional approval of the NPS plan. They have had plenty of time to take action but have not.

They are not protecting our waterways nor the environment in general.

Thank you,

Amy Allen, DVM, Diplomat ACVIM

Amy Allen, DVM, Diplomat ACVIM

These are a start but too little too late:

Reduce Authorized Dairy Operations within Planning Area

Following the April 2021 Commission hearing, the McClure Dairy at I Ranch notified the NPS that it would cease dairy operations by July 2021. As a result of this notification, the NPS made the following adjustments to the GMPA preferred alternative and adopted these changes in the ROD:

- Reduce the number of authorized dairies from six to five, and prohibit replacement of dairy operations if additional dairies close;
- Reduce authorized dairy animals by 22% (690 dairy animals) in the planning area (3,115 to 2,425 dairy animals);
- reduce the total acreage affected by Manure and Nutrient Management (manure spreading) from 2,500 acres to 1,800 acres (approximately 28%); and
- remove 552 acres of Forage Production from the planning area (55% reduction in area authorized for forage production in the planning area).

**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting  
**Date:** Friday, April 1, 2022 5:08:29 PM

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**From:** Elizabeth Kay Fife <[fife@usc.edu](mailto:fife@usc.edu)>  
**Sent:** Friday, April 1, 2022 4:54 PM  
**To:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal) <[NorthCoast@coastal.ca.gov](mailto:NorthCoast@coastal.ca.gov)>  
**Subject:** Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

Dear Coastal Commissioners,

It is unacceptable that in the 60 years of the Seashore's existence, efforts towards water quality management are essentially non-existent. Water quality enforcement and testing procedures need to be put in place to safeguard California's environment and the biodiversity of this area in the face of climate change. This seems like the minimum that can be done in the face of the General Management Plan Amendment which apparently will extend, and in fact expand for-profit cattle-ranching businesses in our state's national seashore. We understand that the cattle rancher's have received advantageous land leases covering one-third of the Seashore's territory--despite widespread public dissent. To allow private interests to profit and to take priority over the public interest demonstrates a failure of governance. Please do what is possible to mitigate the environmental damage of the Big Ag's intrusion into the Point Reyes National Seashore and in the near term remedy the poor oversight that has affected not only water quality, but the destruction of grasslands and wildlife (the Tule Elk). We urge the Coastal Commission to review this situation in its totality and take action to properly protect the Point Reyes National Seashore.

Thank you for your careful consideration of this important and unique California resource.

Best Regards,  
Elizabeth Fife  
Kay Fife  
David Sawcer

-----  
Elizabeth Fife, Ph.D.  
Associate Professor, Technical Communication Practice  
Viterbi School of Engineering, OHE 104  
University of Southern California  
Los Angeles, CA 90089  
[fife@usc.edu](mailto:fife@usc.edu)

**From:** [NorthCoast@Coastal](mailto:NorthCoast@Coastal)  
**To:** [Krygsman, Vail@Coastal](mailto:Krygsman,Vail@Coastal); [Teufel, Cassidy@Coastal](mailto:Teufel,Cassidy@Coastal)  
**Subject:** FW: water testing on PRNS  
**Date:** Thursday, March 31, 2022 3:09:08 PM

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**From:** robert raven <robraven60@gmail.com>  
**Sent:** Thursday, March 31, 2022 12:06 AM  
**To:** NorthCoast@Coastal <NorthCoast@coastal.ca.gov>  
**Subject:** water testing on PRNS

North Beach and Limantour Beach should also be tested regularly for bacteria. Dogs, children and adults walk and play on those beaches, and could get sick.

**From:** [Graham Harold Creasey](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Killing Tule Elk  
**Date:** Thursday, March 24, 2022 10:55:02 AM

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Dear fellow-Californians,

I moved to California because of its history of enlightened management of wonderful natural resources.

People from all over the world visit California for the same reason.

Point Reyes is a spectacular example of a natural resource within reach of a major international city.

It demonstrates to thousands of people every year the value of conserving and preserving nature.

This contributes to California's magnetic status and economic prosperity.

**The proposal to kill tule elk and replace them with cattle and other farm animals is a profoundly backward step.**

This will be seen in history as a short-sighted and tragic example of mis-management.

**Please avoid making this serious mistake before it is too late.**

Sincerely

Graham Creasey, MD, FRCSEd  
Professor Emeritus  
Stanford University

**From:** [dan\\_dietrich2002@yahoo.com](mailto:dan_dietrich2002@yahoo.com)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Point Reyes Consistency Determination  
**Date:** Friday, March 25, 2022 4:48:27 PM

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Dear California Coastal Commissioners:

I am a full-time resident of Inverness, CA and operate a guiding business where I guide wildlife lovers and photographers into Point Reyes National Seashore. Days I do not guide, I visit this National Park for my personal enjoyment. I am in the park nearly every day. I urge the California Coastal Commission to put the Point Reyes Consistency Determination on the April 2022 Commission Agenda for action by the Commission, including the option to revoke the Conditional Concurrence it issued in April of 2021.

The National Park Service has had one year to comply with your request and must be held accountable to bring forth adequate resource protection strategies within the timeframe given to them.

Sincerely,  
Daniel Dietrich



**From:** [daniel@danieldietrichphotography.com](mailto:daniel@danieldietrichphotography.com)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Point Reyes National Seashore  
**Date:** Friday, April 1, 2022 2:52:51 PM

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Dear California Coastal Commissioners,

I am a guide in Point Reyes National Seashore and am in the Park near daily.

Over the past 10 years in fighting for the protection of this park, I have been assured by the National Park Service that the Best Management Practices are being used to ensure the protection of our wildlife and natural resources. But these BMPs have failed to do that. 40x the E. coli levels in the waters that feed our coastline and that my 2 young daughters play in is not natural resource protection. The culling of native tule elk is not wildlife protection. The enormous contribution the over 5000 cows have to climate change is not addressing this issue.

BMPs do not provide continual and infinite improvements to water quality. Once implemented, they provide a return that eventually flattens. If we have 40x the safe levels of E. coli in our waterways with existing BMPs in place, I question how incremental improvements to these existing BMPs can ensure the necessary improvements to reach consistent and permanent protections of our waterways.

In the recent past, a ranch which sits on a waterway that feeds one of the only elephant seal breeding grounds in the world was found to be raising pigs, a violation of their lease. Where did the pig urine go? Was it mixed with the cow waste and spread over the land to then wash into the stream that feeds the beach where the elephant seals give birth?

Late last year a rancher was caught bulldozing a sensitive riparian area along a creek which feeds Drakes Estero. Since, invasive weeds have dominated the cut. The stream bank was also bulldozed. Trees were chain sawed and native brush uprooted, a violation of the lease. There seemingly has been little done to repair this destruction as seen by continued visits to the site.

Late last year an enormous dump was found along one ranch driveway filled with rusted out cars, trucks and other waste. This dump sits above a waterway that feeds Drakes Estero.

NPS in the process of excavating the ground in an area near a barn where 55 gallon drums were found tipped upside down with diesel fuel running out of them into the ground.

There is now word of raw sewage running from ranch housing directly into the fields above Drakes Estero.

All these issues have happened in the past 18 months. What else is the public not aware of?

In discussing other issues in the National Park with park staff, I have been told there are not enough resources to address these issues. The National Park Service's proposed plan needs significant resources and funding to implement. These resources seem unavailable at this time. I question if the necessary resources to implement a plan this large and complex would ever have the necessary funding and personnel to be properly implemented and enforced.

Please take action to defend our incredible California coast.

Sincerely,

Daniel Dietrich

**From:** [robert raven](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** PRNS comment  
**Date:** Thursday, March 31, 2022 11:32:04 PM

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I am writing about PRNS Water Quality issues.

There should also be regular testing of North Beach and Limantour Beach.  
Both North and Limantour beaches are downstream from dairies and ranches.  
Many families and dogs visit both "pristine" beaches. Are they safe to be on?

I like that NPS is making water testing and improvements mandatory. But what are the consequences for failing water tests? Fines? Termination of the lease?

One section of the plan said testing of dairy runoff was mandated every winter. Was that done? I read that water testing was last done almost a decade ago.

NPS has allowed many violations of existing leases, apparently without penalty. NPS didn't even notice a huge dump of cars and tires in the National Seashore. Visitors spotted and reported the lease violations. NPS even ignored dying elk.

Can NPS be trusted? The plan says good things, but will NPS walk the talk?

Mandatory changes will require enforcement against politically connected ranchers. Violators should be fined, and if it's repeated, to lose the lease.

Dairies should revert to nature. They are badly degraded, and need to heal. Remove the cows at PRNS, open the Reserve jail fence, and let the elk roam!

Robert Raven  
Petaluma

**From:** [robert raven](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** protect the coast!  
**Date:** Friday, March 18, 2022 8:36:36 PM

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The dairies and ranches on PRNS are polluting creeks, wetlands and beaches.  
Runoff of manure and urine can harm protected frogs, fish and marine mammals.  
Toxic beaches are closed to visitors, which affects thousands of families and dogs.  
Remove dairies and ranches from the National Seashore, also fences and trash.  
Thanks!

**From:** [dorette.english](#)  
**To:** [Energy@Coastal](mailto:Energy@Coastal)  
**Cc:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment - Dorette Quintana English  
**Date:** Friday, April 1, 2022 4:05:23 PM

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Dear California Coastal Commissioners,

Thank you for your leadership to hold the National Park Service, Point Reyes National Seashore accountable to the conditions of your 2021 ruling on federal consistency. The lands, waters, plants and wildlife at Point Reyes National Seashore are in a constant state of degradation from the impact of the thousands of dairy and beef cattle on commercial ranches—even with the recent reduction from McClure's ranch. As a friend of a descendant of the Coast Miwok Felix Family, I have driven through ranches to get to my friend's ancestral home at Laird's Landing. I have witnessed the destruction and impact of grazing on ancestral Coast Miwok homelands on the watershed, coastal waters and native plant and animal populations. It's time to end ranching on these beautiful Miwok homelands to instate the original plan for the Point Reyes National Park - as an accessible national park for people in the greater San Francisco Area who otherwise might not have this experience.

If California leadership, like the California Coastal Commission, does not step forward to protect the waters, lands, plants and wildlife and equitable access and use at PRNS who will? These waters, lands, plants and wildlife are silent contributors to a healthy environment. They are our Indigenous relatives and we must protect them as we do our human relatives.

On April 7, 2022 the Native American Cultural Center at Yale and Yale Center for Environmental Justice will host the meeting, "Towards#landback: Indigenous Leadership in Land Conservation" with NPS Director Charles Sams III.

This June the Healthy Public Lands Project is hosting a conference on public lands management and stated "Given the urgency of the climate crisis, the Healthy Public Lands Project takes the position that the only appropriate response is to end this ecologically damaging, economically irresponsible practice [grazing]. Public lands should be for public wildlife; the presence of non-native livestock has real costs for western communities."

This is just a sampling of discussions across the nation questioning management practices of public lands and advocating for the benefits of employing Indigenous science practices to restore and protect the waters, lands, plants and wildlife. Our future is at stake as we approach another summer of drought conditions and potential wildfires. We know how bleak the summer months will be for our relatives, the tule elk, held behind the fences.

I urge you, as the appointed protectors of California's coastal lands and waters, continue your path as a force to end the degradation of the lands and waters and

the loss of plant and animal life at Point Reyes National Seashore.

I urge you to retract your provisional approval of the PRNS General Management Plan Amendment. Let's make these lands open and 100% accessible to indigenous people, the public for enjoyment of the natural landscape, and indigenous species such as the Tule Elk, marine species and plants.

Sincerely,

Dorette Quintana English  
Environmental Health and Equity Consultant  
96 FarmLane  
Martinez, CA 94553  
Dqe1@att.net

**From:** [Sharon Ponsford](#)  
**To:** [Energy@Coastal](mailto:Energy@Coastal)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-20 (National Park Service, Marin Co.)  
**Date:** Friday, April 1, 2022 10:54:35 AM

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Dear Commissioners:

It is way past time that ranches be removed from the Point Reyes National Seashore. Everyone should understand by now that the harm that cattle do to the environment is unrelenting. As one who has worked “hands on” with wildlife for many years, I find it especially egregious that our majestic native Tule Elk are fenced in — and could be killed — so that they don’t interfere with cattle grazing. Those cattle, by the way, will all be killed eventually, as such is the life of a cow. Wildlife should always have the priority in a national park.

The National Park Service has come up with water and air pollution plans, but I see problems here. #1 is that the NPS has lost all credibility at Pt. Reyes, by always putting ranching ahead of what a park should be, an environmental masterpiece. As the NPS really didn’t have a plan or come up with any enforcements, they can’t be trusted now. They’ve already asked for a delay, which thankfully the Commission denied.

At the moment we know that Pt. Reyes National Park contains some of the worst water quality in California - and it flows right into the Pacific Ocean. There is really no way that cattle and a clean environment can co-exist. It’s not just about the water, but the native flora and fauna have been very damaged by the heavy footprint of cows. This can all come back, if the cows and ranchers leave. That is the only way it will happen. This is also what the general public wants - who wants ranches in a national park?

Please rescind your approval of the GMPA for Point Reyes Seashore. The NPS needs to get serious about being a park, taking care of it’s environment, and protecting wildlife - not cows.

Thank you.

Sharon Ponsford  
436 Trail Ridge Place  
Santa Rosa, CA 95409

**From:** [Zorina Kibrick](#)  
**To:** [Energy@Coastal](mailto:Energy@Coastal)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-20 (National Park Service, Marin Co.)- In support of denying NPS's inadequate plans for Point Reyes  
**Date:** Thursday, March 31, 2022 1:40:33 PM

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Point Reyes is **public land**, not private land. Ranching and dairy entities are private businesses. Yes, they are on historic ranching land but that is not a reason to continue their existence. Hunting grizzly bears in California was part of our history not so long ago. Just because something made sense in the past does not justify its continuation if it isn't environmentally defensible and a sustainable practice. In addition, **the mission of the NPS is to preserve, not to sell out**. Allowing leases for cattle grazing is counter to this mission as it actually speeds the destruction of the habitat and puts the elk in danger. 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.

There are 335 million Americans who are the rightful owners of Point Reyes National Seashore, and 7 million of them live in the nearby Bay Area, an area starved for available public lands for recreation. The National Park Service should not continue to manage Point Reyes National Seashore for the private profit of 13 ranches, including large corporations, while neglecting the public interest to manage these lands for conservation and public enjoyment. It is time to end the extension of Park Service leases on Point Reyes for livestock grazing. Furthermore, an analysis by park advocates found that fully 91.4% of the public comments opposed ranching and as this is public land, not private, I ask that you deny the NPS's inadequate plans for Point Reyes.

Please add my voice to the increasing numbers of Californians and all Americans that want to preserve national treasures like coastal prairie habitat and elk for future generations.

Thank you for your consideration in this matter,  
Zorina Kibrick  
836 Autumn Lane  
Mill Valley, CA 94941

Sent from my iPad

**From:** [Barry Bussewitz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 12:47:07 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Barry Bussewitz  
[barryalbert@sonic.net](mailto:barryalbert@sonic.net)



**From:** [robert raven](#)  
**To:** [Bernie Album](#)  
**Cc:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Re: Point Reyes: Park Service  
**Date:** Sunday, March 20, 2022 2:13:40 AM

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Good letter, Bernie. Thanks for sharing!

On Sat, Mar 19, 2022 at 3:55 PM Bernie Album <[allbernie5@gmail.com](mailto:allbernie5@gmail.com)> wrote:  
California Coastal Commision Members,

This is my public comment for the CCC April 7,2022 meeting Agenda item: the Point Reyes National SeaShore Park and the National Park Service request for more time to comply with cleaning up land and water pollution.

The problems caused by private agriculture operating cattle and dairy operations in our nation park are insurmountable no matter the time provided. The manure and urine going into the ground enter the water table thereby the water run off is poison for the grass food for grazing elk and all other wildlife, including marine animals along our California Coast. The extent of the pollution is vast and the consequences devastating to the surrounding ecosystem. The only way to stop this travesty is to deny the National Park Service and the private ranches on public property a use permit. No use permit will mean the land, ground water, and our ocean coast will become clean again which will allow all the natural habitat to become restored and survive.

Bernard Album  
1666 Creekview Circle  
Petaluma, CA 94954  
707-766-7056 [allbernie5@gmail.com](mailto:allbernie5@gmail.com)

**From:** [Alan Spencer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** RE: Request for Commission Action on the Point Reyes Coastal Consistency Determination (CD-0006-20) at the April 2022 Meeting  
**Date:** Thursday, March 24, 2022 9:33:53 AM

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Chair Brownsey, Vice Chair Hart and Members of the Commission:

**We request that the Coastal Commission put the Point Reyes Consistency Determination on the April 2022 Commission Agenda for action by the Commission, including the option to revoke the Conditional Concurrence it issued in April 2021.**<sup>[1]</sup>

When the Commission narrowly approved Conditional Concurrence by a 5-4 vote last April, it specifically directed the National Park Service (NPS) to address serious concerns it had with topics ranging from water quality to Tule Elk to climate change. For example, the Commission added a condition that the NPS would bring a water quality strategy to the Commission **within 12 months for public review and Commission review and approval.**<sup>[2]</sup> Importantly, the Commission retained oversight and jurisdiction over this condition, including independently reviewing the NPS' water quality strategy to determine if it protects coastal resources to the maximum extent practicable, or if it should be rejected. Due to the very urgent concerns raised by the Commission and members of the public, the Conditional Concurrence required action on this matter within 12 months, which would be April 2022.

As Commission staff wrote to the NPS on May 10, 2021, "[t]he Commission determined that, only as conditioned, could the GMPA be found consistent to the maximum extent practicable with the enforceable policies of the California Coastal Management Program. The Commission notes that as provided in 15 CFR § 930.4(b), should the NPS not agree with the Commission's condition of concurrence, then all parties shall treat this conditional concurrence as an objection."

The NPS must be held accountable to bring forth adequate resource protection strategies within the timeframe the Commission directed, and NPS agreed to, a year ago. Development of these strategies within the one year timeframe was

fundamental to the Commission's decision to conditionally approve the Consistency Determination and remains essential for ensuring the protection of one of the most biologically important areas in the state. Please ensure that this Point Reyes Consistency Determination is placed on the April 2022 agenda for action by the Commission, including the option to revoke the Conditional Concurrence.

Thank you for your consideration.

Sincerely,

**Paula & Alan Spencer**  
**San Anselmo, CA**

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[1] The current wording of the April 2022 agenda notes the Commission will consider this matter, but it is not clear that the Commission will vote on if the NPS has produced an adequate Water Quality Strategy within 12 months as required by the Commission: "Coastal Commission consideration of Water Quality Strategy and Climate Action Plan developed by National Park Service (NPS) as specified in Conditions I and IV of the Coastal Commission's conditional concurrence on Consistency Determination No. CD-0006-20 for the 2020 General Management Plan Amendment for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area, Marin County."

[2] "Condition: The National Park Service will bring its water quality strategy to the Commission within a period of twelve months for public review, as well as Commission review and approval."

**From:** [Susan Ives Communications](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Revoke Point Reyes Consistency Determination  
**Date:** Friday, April 1, 2022 8:41:20 AM

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Dear Commissioners,

In April 2021, in testimony to the CCC, I asked the Commission to withhold its approval of the National Park Service's GMPA for Point Reyes Seashore.

The GMPA, subsequently approved, failed to provide important details as to how the NPS would monitor and mitigate environmental impacts from commercial cattle ranching in the Seashore.

The NPS plan simply said "Trust us."

Prior to and subsequent to the GMPA's adoption:

The NPS consistently prioritized beef and dairy operations over protecting ecosystems within and surrounding the national park, with negative impacts to the coastal resources.

The NPS turned a blind eye to ranching's impacts to public lands and resources at the Seashore, including in the coastal zone.

The NPS failed to enforce flagrant lease violations (overstocking livestock, illegal dumping, destroying riparian areas, harassing wildlife, cattle trampling and fouling habitat, manure runoff).

The NPS failed to address public concerns at the growing control ranchers have over the Seashore.

The NPS failed to monitor or uphold regulations to protect public health and the environment. Water quality in the Seashore—including the coastal zone—consistently exceeds public health standards.,

The NPS's failed to manage cattle impacts that curtail the public's safe use and enjoyment of public lands, including in coastal areas.

The NPS continually persecutes wildlife on ranchers' behalf, including in the coastal zone.

The NPS has been unresponsive to requests for the public information regarding water quality, park operating budgets, lease violations and enforcement, and more, depriving the public of the information needed to formulate comments to NPS plans.

The NPS consistently flouts deadlines, with no consequences

In approving the NPS's ranching plan last year, the CCC required the NPS to develop a strategy to address water pollution and climate warming impacts, which are contributing to sea level rise and loss of species. Like the GMPA it is to supplement, the NPS's "strategy" does not adequately address the problems CCC Commissioners rightly called out.

Plans require goals, timelines and benchmarks.

Writing a plan doesn't solve the problem. The plan must be implemented—and in a timely way—and evaluated for its effectiveness.

Please take action to defend the coast.

The public needs the CCC to hold the NPS accountable to its agreement and to its public mission.

Rescind your approval of the GMPA for Point Reyes Seashore. Send a message to the NPS that business as usual is not acceptable.

Thank you.

**From:** [Matt Maguire](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Rice recusal from April 7th meeting  
**Date:** Friday, April 1, 2022 4:31:13 PM  
**Attachments:** [Coda Rqst Rice Recusal.3.31.22.pdf](#)

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Dear Commissioners:

My friend Jim Coda shared the attached letter to the Coastal Commission with me. Having read his letter and given its point serious consideration, I have to concur with Jim: Katie Rice must recuse herself, or be recused, from your April 7th hearing at which you will be considering Agenda Item Th18a, the Conditional Compliance for Consistency Determination No. CD-0006-20.

If Commissioner Rice does not recuse herself or is not otherwise recused, it will call into question the validity of any decision the Commission makes at this hearing, as it does the Commission's split vote on April 22, 2021, regarding the National Park Service's request for a finding of Coastal Act consistency. I would hope that the Commission would not jeopardize its time and effort by acting in a potentially illegal manner.

I join Mr. Coda in requesting that Commissioner Rice recuse herself from the hearing, and that the Commission acts in the spirit and letter of the enabling law under which it operates.

Thank you for your consideration.

Matt Maguire  
626 East D St.  
Petaluma CA 94952

**From:** [Marianne Pastrano & Arthur Mendoza](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Cc:** [Daniel Dietrich](#); [Cuckoo Mole](#)  
**Subject:** Save Tule Elk  
**Date:** Thursday, March 24, 2022 6:25:11 PM

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I am aware of the current quest to kill the Tule Elk in favor of agriculture but I personally believe that these Tule Elk, native species, deserve more than this treatment. They deserve to continue to live in Point Reyes National Park. It is a National Park and it should be used for these animals to explore and should not be used for profit purposes.

My 10-yr daughter shares my view and is very passionate about this. We are strongly against the killing of these beautiful animals. She did a presentation on Saving the Tule Elk for her Passion Project presentation in school. We were given a second chance to experience them. They were extinct but now we have a chance to live side by side with them. We hiked 9.4 miles in Tomales Bay Point in order to be with them. They are amazing creatures. Please devise some other ways to produce food or expand agriculture without sacrificing their lives.

Thank you very much.

Marianne Mendoza  
Danville CA

**From:** [ficsriolfi@everyactioncustom.com](mailto:ficsriolfi@everyactioncustom.com) on behalf of [Filippo Riolfi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Further Inquiry Needed Before Signing Away Point Reyes National Seashore  
**Date:** Wednesday, March 30, 2022 2:19:26 PM

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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. Filippo Riolfi  
Via Giacomo Matteotti San Pietro In Cariano, 37029  
[ficsriolfi@gmail.com](mailto:ficsriolfi@gmail.com)

**From:** [Craig Downer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Cc:** [Ccdowner@aol.com](mailto:Ccdowner@aol.com)  
**Subject:** Input on Climate plan for PRNS  
**Date:** Friday, March 18, 2022 3:14:17 PM

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Dear Sir/Mame: I would like to urge you to consider the positive effects of the Elk in this national seashore. One of the major of which is keeping vegetation well pruned. This is a very important factor in mitigating wildfires since they reduce dry tinder. Also you will be saving an endangered species and fulfilling your true mandate rather than catering to dairy ranchers. Best wishes, Craig

Sent from [Mail](#) for Windows



**From:** [jennifer unger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 2:52:14 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
jennifer unger  
[jlunger@wyasd.org](mailto:jlunger@wyasd.org)

**From:** [Idoia Tobillas Hernando](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 2:51:08 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS’ purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California’s endemic Tule elk.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Idoia Tobillas Hernando  
[idoiatobillas@gmail.com](mailto:idoiatobillas@gmail.com)

**From:** [Brian Dorsey](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 2:20:09 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Brian Dorsey  
[bdorsey@umich.edu](mailto:bdorsey@umich.edu)

**From:** [karen sanchez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 2:08:13 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural

resources on our public lands.

Sincerely,  
karen sanchez  
kmarita2@yahoo.com

**From:** [Kerstin Murr](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 2:07:09 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Kindly act in the best interest of the public good.

Sincerely,  
Kerstin Murr  
[Schranzprinzessin@hotmail.com](mailto:Schranzprinzessin@hotmail.com)

**From:** [Herbert Staniek](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 1:51:07 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS’ plan. The impacts of ranching in PRNS is well documented in the NPS’ own EIS - ranching must end in PRNS.

Sincerely,  
Herbert Staniek  
[herbert.staniek@hotmail.com](mailto:herbert.staniek@hotmail.com)

**From:** ["Jason Kamalie`"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 1:46:09 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,



**From:** [Ellen Easum](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 1:08:07 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Ellen Easum  
[eeasum@hotmail.com](mailto:eeasum@hotmail.com)

**From:** [Sylvie Auger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 12:57:08 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Sylvie Auger  
[sylvieauger55@gmail.com](mailto:sylvieauger55@gmail.com)

**From:** [Sylvie Auger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 12:56:10 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Cows produce 150 billion gallons of methane per day.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Sylvie Auger  
[sylvieauger55@gmail.com](mailto:sylvieauger55@gmail.com)

**From:** [Suzanne Hodges](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 12:43:08 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Suzanne Hodges  
[antiguasue@hotmail.com](mailto:antiguasue@hotmail.com)

**From:** [Darlene Wolf](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 12:33:10 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Darlene Wolf  
[blackfoot1@protonmail.com](mailto:blackfoot1@protonmail.com)

**From:** [Barbara Rizzardi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 12:20:14 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Barbara Rizzardi  
[WelcometoRizzWorld@outlook.com](mailto:WelcometoRizzWorld@outlook.com)

**From:** [Maribel Jerez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 11:43:16 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Maribel Jerez  
[shoryomo@gmail.com](mailto:shoryomo@gmail.com)

**From:** [Antonella Nielsen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 11:14:14 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Antonella Nielsen  
[joebasse94@yahoo.com](mailto:joebasse94@yahoo.com)



**From:** [Jeanette Leinweber](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 11:09:13 AM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Jeanette Leinweber  
[leinweberjf@aol.com](mailto:leinweberjf@aol.com)

**From:** [Aurora Ln](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 10:51:10 AM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Aurora Ln  
al\_beexi3@yahoo.com

**From:** [Maree Penhart](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 10:47:08 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Maree Penhart  
[mpenhart@yahoo.com](mailto:mpenhart@yahoo.com)

**From:** [kate linton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 10:22:09 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
kate linton  
[kschmid86@hotmail.com](mailto:kschmid86@hotmail.com)

**From:** [Lillemor Dahlgren](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 10:11:09 AM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Lillemor Dahlgren  
[rallymor@hotmail.com](mailto:rallymor@hotmail.com)

**From:** [Lauren Kupp](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 10:10:12 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Lauren Kupp  
[le.wylde@yahoo.com](mailto:le.wylde@yahoo.com)

**From:** [Juli Schulz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 10:07:08 AM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Juli Schulz  
[ecojulijuli@gmail.com](mailto:ecojulijuli@gmail.com)

**From:** [Alan Hyden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 10:01:12 AM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

“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.”

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS’ and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS’ plan, and find the plan not consistent.

Sincerely,  
Alan Hyden  
[csl230@yahoo.com](mailto:csl230@yahoo.com)



**From:** [Pablo Bobe](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 9:57:07 AM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

The CCC should not approve of a Climate Action Strategy from the NPS that can’t prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Pablo Bobe  
[pablomartinbobe@hotmail.com](mailto:pablomartinbobe@hotmail.com)

**From:** [Shannon Corbeil](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 9:21:07 AM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Shannon Corbeil  
[volatilecurlz@hotmail.com](mailto:volatilecurlz@hotmail.com)

**From:** [Sparrow McMorran](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 9:20:10 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Sparrow McMorran  
[sserrano\\_7@hotmail.com](mailto:sserrano_7@hotmail.com)

**From:** [Lisa Goetz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 9:15:17 AM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Lisa Goetz  
[jilly415@yahoo.com](mailto:jilly415@yahoo.com)

**From:** [Roxanne Moreno](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 9:08:06 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Roxanne Moreno  
[aquariosis@yahoo.com](mailto:aquariosis@yahoo.com)

**From:** [Geraldine Greller](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 8:13:07 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Geraldine Greller  
[ggreller@optonline.net](mailto:ggreller@optonline.net)

**From:** [Cheryl Henley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 8:03:08 AM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Cheryl Henley  
[wildonionyoga@live.com](mailto:wildonionyoga@live.com)

**From:** [Raleigh Koritz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 7:57:12 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Raleigh Koritz  
tabbykat728@q.com



**From:** [Raleigh Koritz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 7:00:19 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Raleigh Koritz  
tabbykat728@q.com

**From:** [maria joannou](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 6:53:07 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
maria joannou  
[maria.joannou@t-online.de](mailto:maria.joannou@t-online.de)

**From:** [Kelly Devore](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 6:51:10 AM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Kelly Devore

**From:** [Michael Gannon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 6:41:11 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, “The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention.” This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS’ plan. The impacts of ranching in PRNS is well documented in the NPS’ own EIS - ranching must end in PRNS.

Sincerely,  
Michael Gannon  
[mikegg888@gmail.com](mailto:mikegg888@gmail.com)

**From:** [Nicole Berkheimer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 6:25:09 AM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Nicole Berkheimer  
mcphenl8@hotmail.com

**From:** [Erica Sohl](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 6:07:07 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Kindly act in the best interest of the public good.

Sincerely,  
Erica Sohl  
[81irving@gmail.com](mailto:81irving@gmail.com)

**From:** [Kimberly Schmidt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 5:55:12 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Kimberly Schmidt  
[hutchka@yahoo.com](mailto:hutchka@yahoo.com)

**From:** [Shana Van Meter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 5:49:08 AM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Shana Van Meter  
[shanarvm@hotmail.com](mailto:shanarvm@hotmail.com)



**From:** [Kaiba White](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 5:39:10 AM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Kaiba White  
[kaibawhite@gmail.com](mailto:kaibawhite@gmail.com)

**From:** [sandra albo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 5:33:09 AM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
sandra albo  
[albosand@libero.it](mailto:albosand@libero.it)

**From:** [Mai Hermann](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 5:06:09 AM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Mai Hermann  
[laura.hassin@gmail.com](mailto:laura.hassin@gmail.com)

**From:** [Teo Teo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 4:51:06 AM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Teo Teo  
[evilteo666@abv.bg](mailto:evilteo666@abv.bg)

**From:** [Bonnie Horeski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 3:18:08 AM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Bonnie Horeski  
[bhoreski@yahoo.com](mailto:bhoreski@yahoo.com)

**From:** [Susan Lefler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 1:47:07 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Susan Lefler

**From:** [Kenneth Low](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 1:09:09 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Kenneth Low  
[kenneke24@hotmail.com](mailto:kenneke24@hotmail.com)

**From:** [Valerie Sadoulet](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 12:49:09 AM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Valerie Sadoulet  
[vsadoulet@twc.com](mailto:vsadoulet@twc.com)



**From:** [Bernadet Denissen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 12:38:07 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Bernadet Denissen  
[b.a.denissen@gmail.com](mailto:b.a.denissen@gmail.com)

**From:** [Eva Johansson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 12:24:07 AM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Eva Johansson  
[eva.k.johansson@icloud.com](mailto:eva.k.johansson@icloud.com)

**From:** [Maria Schneider](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:49:14 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Maria Schneider  
[thesmophoros@yahoo.de](mailto:thesmophoros@yahoo.de)

**From:** [Ya Hui Shih](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:06:07 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Ya Hui Shih  
yhshih@hotmail.com

**From:** ["M.K. Russell"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:02:08 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
M.K. Russell  
katalyst123@comcast.net

**From:** [Tamaron Greene](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:45:14 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, “The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention.” This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Tamaron Greene  
[tamarong@gmail.com](mailto:tamarong@gmail.com)

**From:** [Catherine Beauchamp](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:33:08 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Catherine Beauchamp  
[clhediting@gmail.com](mailto:clhediting@gmail.com)

**From:** [Jennifer Kerrigan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:15:11 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Jennifer Kerrigan  
[jenn.network@gmail.com](mailto:jenn.network@gmail.com)



**From:** [Warren TenHouten](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:39:12 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Warren TenHouten  
[warren\\_tenhouten@yahoo.com](mailto:warren_tenhouten@yahoo.com)

**From:** [Maria Gritsch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:39:07 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Maria Gritsch  
[mariafgritsch@yahoo.com](mailto:mariafgritsch@yahoo.com)

**From:** [WILLIAM BUTLER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:23:13 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
WILLIAM BUTLER  
williamabutler@yahoo.com

**From:** [Daniel Rechtschaffen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:07:10 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Daniel Rechtschaffen  
[djrechtschaffen@gmail.com](mailto:djrechtschaffen@gmail.com)

**From:** [Alan Gump](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:01:10 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Alan Gump  
[alangump@yahoo.com](mailto:alangump@yahoo.com)

**From:** [Lu Morano](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:57:11 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Lu Morano  
[worldphoenixrising@gmail.com](mailto:worldphoenixrising@gmail.com)

**From:** [sharon.cederblom](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:49:08 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

“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.”

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8’ fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS’ plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS’ plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
sharon.cederblom  
sjckitten@gmail.com

**From:** [Mika Hyden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:43:19 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

Kindly act in the best interest of the public good.

Sincerely,  
Mika Hyden  
[mika.hyden@gmail.com](mailto:mika.hyden@gmail.com)



**From:** [Heather Smith](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:10:11 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

"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."

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Heather Smith  
[heatherluna25@gmail.com](mailto:heatherluna25@gmail.com)

**From:** [Francine DiBernardo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:05:13 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

US Methane emissions from livestock and natural gas are nearly equal.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Francine DiBernardo  
[frandibern@gmail.com](mailto:frandibern@gmail.com)

**From:** [Chris S](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:55:11 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Chris S  
[schank.schank@gmail.com](mailto:schank.schank@gmail.com)

**From:** [Chris S](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:54:13 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Chris S  
[schank.schank@gmail.com](mailto:schank.schank@gmail.com)

**From:** [Susanna Wilson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:36:12 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Susanna Wilson  
[osus@pacbell.net](mailto:osus@pacbell.net)

**From:** [Jennifer Hagens](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:32:09 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Jennifer Hagens  
[j.hagens8@hotmail.com](mailto:j.hagens8@hotmail.com)

**From:** [Jacquie Bellon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:22:15 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Jacquie Bellon  
[jacquiebellon@gmail.com](mailto:jacquiebellon@gmail.com)

**From:** [Jessica Notheis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:19:06 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Jessica Notheis  
[notheisj@mac.com](mailto:notheisj@mac.com)



**From:** [Jessica Notheis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:18:10 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Jessica Notheis  
[notheisj@mac.com](mailto:notheisj@mac.com)

**From:** [Margaret Schlachter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:00:17 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Margaret Schlachter  
[m.schlachter@sbcglobal.net](mailto:m.schlachter@sbcglobal.net)

**From:** [Beth Prudden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:59:09 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Beth Prudden  
[Bethbuff16@aol.com](mailto:Bethbuff16@aol.com)

**From:** [Sheilah McAnney](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:47:12 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Sheilah McAnney  
gatorlove89@hotmail.com

**From:** [Steven Katz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:45:15 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Steven Katz  
[stevekatzchiro@gmail.com](mailto:stevekatzchiro@gmail.com)

**From:** [Bobbie Knight](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:38:12 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Bobbie Knight  
[edgarbyknight@hotmail.com](mailto:edgarbyknight@hotmail.com)

**From:** [Dawn Klamm](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:35:18 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Dawn Klamm  
[theklamms@hotmail.com](mailto:theklamms@hotmail.com)

**From:** [Zoe LeBlanc](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:31:19 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Zoe LeBlanc  
[librarywaltz@yahoo.com](mailto:librarywaltz@yahoo.com)



**From:** [Danielle Katz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:31:12 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Danielle Katz  
[danielle@riversforchange.org](mailto:danielle@riversforchange.org)

**From:** [Sarah Aiello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:27:16 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Sarah Aiello  
[medeablue@gmail.com](mailto:medeablue@gmail.com)

**From:** [AJ Ireland](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:27:11 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

US Methane emissions from livestock and natural gas are nearly equal.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
AJ Ireland  
[amelia.ireland@gmail.com](mailto:amelia.ireland@gmail.com)

**From:** [Bruce Campbell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:45:21 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Bruce Campbell  
[madroneweb@aol.com](mailto:madroneweb@aol.com)

**From:** [alena Jorgensen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:42:16 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
alena Jorgensen  
[aj.1156@yahoo.com](mailto:aj.1156@yahoo.com)

**From:** [David Darlington](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:42:10 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

“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.”

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
David Darlington  
[ddarlington@sbcglobal.net](mailto:ddarlington@sbcglobal.net)

**From:** [Annette Hummell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:37:11 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Annette Hummell  
[hummell1958@gmail.com](mailto:hummell1958@gmail.com)

**From:** [Stacy Kibrick](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:32:07 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. “Carbon farms” are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Stacy Kibrick  
[skibrick@levi.com](mailto:skibrick@levi.com)



**From:** [Bev Von Dohre](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:31:19 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Bev Von Dohre  
[slakewings@aol.com](mailto:slakewings@aol.com)

**From:** [Jennifer Hayes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:23:18 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Jennifer Hayes  
[xandysmom@aol.com](mailto:xandysmom@aol.com)

**From:** [Mary DAmico](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:06:23 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Mary DAmico  
[marydamico807@gmail.com](mailto:marydamico807@gmail.com)

**From:** [Erik Melear](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:04:08 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

Kindly act in the best interest of the public good.

Sincerely,  
Erik Melear  
[h20eng@hotmail.com](mailto:h20eng@hotmail.com)

**From:** [Richard Balducci](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:53:07 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Richard Balducci  
[richard.balducci@yahoo.com](mailto:richard.balducci@yahoo.com)

**From:** [Joel Schkloven](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:50:09 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Joel Schkloven  
[jjsolo0607@gmail.com](mailto:jjsolo0607@gmail.com)

**From:** [melvin taylor](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:45:18 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
melvin taylor  
[melvin-taylor@usa.net](mailto:melvin-taylor@usa.net)

**From:** [eberle ewing](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:42:10 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
eberle ewing  
[eberle16@comcast.net](mailto:eberle16@comcast.net)



**From:** [Erik Melear](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:41:14 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Please provide our native Tule Elk from the NPS’ and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

**From:** [Holly Middleton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:39:14 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS’ plan and help us save our Seashore.

Sincerely,  
Holly Middleton  
[hollicemarie@gmail.com](mailto:hollicemarie@gmail.com)

**From:** [Sharon Morris](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:27:13 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Sharon Morris  
[skmorris101@gmail.com](mailto:skmorris101@gmail.com)

**From:** [Juli Kring](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:22:07 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Juli Kring  
jkuli3@aol.co

**From:** [James Katz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:20:10 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

“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.”

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
James Katz  
[heziekatz@gmail.com](mailto:heziekatz@gmail.com)

**From:** [Sidney Sisk](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:12:10 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

**From:** [Margo Salone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:10:13 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Margo Salone  
[margosalone@live.com](mailto:margosalone@live.com)

**From:** [Juli Kring](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:56:14 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Juli Kring  
[juli3@aol.com](mailto:juli3@aol.com)



**From:** [Cindy Hoffman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:51:16 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Cindy Hoffman  
[cleehoff@outlook.com](mailto:cleehoff@outlook.com)

**From:** [Mingkai Cao](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:41:16 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Mingkai Cao  
[caomingkai1987@gmail.com](mailto:caomingkai1987@gmail.com)

**From:** [Mike Rigoli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:38:10 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Mike Rigoli  
[mrigoli@sbcglobal.net](mailto:mrigoli@sbcglobal.net)

**From:** [Lidia Baltazar](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:37:11 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Lidia Baltazar  
[liidiabaltazar@hotmail.com](mailto:liidiabaltazar@hotmail.com)

**From:** [Bridgett Heinly](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:28:08 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Bridgett Heinly  
kbmdogs@att.net

**From:** [Jo Podvin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:20:18 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Jo Podvin  
[jopodvin@yahoo.com](mailto:jopodvin@yahoo.com)

**From:** [ajeet khalsa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:19:08 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
ajeet khalsa  
[ajeetlotus@gmail.com](mailto:ajeetlotus@gmail.com)

**From:** [Zorina Kibrick](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:13:11 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Zorina Kibrick  
[zkibrick@gmail.com](mailto:zkibrick@gmail.com)



**From:** [Christi E Dillon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:53:16 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Christi E Dillon  
[racegirl1971@yahoo.com](mailto:racegirl1971@yahoo.com)

**From:** [Cheryl Watters](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:49:16 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn’t just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn’t remove the cows from Pt. Reyes.

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Cheryl Watters  
[cheryl40978@aol.com](mailto:cheryl40978@aol.com)

**From:** [Sharon Ponsford](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:48:13 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS’ plan.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Sharon Ponsford  
[slrponsford@yahoo.com](mailto:slrponsford@yahoo.com)

**From:** [Harry van Horn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:46:09 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Harry van Horn  
[h.horn80@upcmail.nl](mailto:h.horn80@upcmail.nl)

**From:** [Onno van Horn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:45:12 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Onno van Horn  
[ovanhorn@gmail.com](mailto:ovanhorn@gmail.com)

**From:** [Steve Black](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:45:12 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Steve Black  
[stevemblack@virginmedia.com](mailto:stevemblack@virginmedia.com)

**From:** [Alexander Achter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:31:13 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,

**From:** [Alexander Achter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:31:08 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Alexander Achter  
[bluz42@hotmail.com](mailto:bluz42@hotmail.com)



**From:** [Milvia Angela Codazzi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:11:11 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Milvia Angela Codazzi  
[milvia.codazzi@comune.milano.it](mailto:milvia.codazzi@comune.milano.it)

**From:** [Nora Abdo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:07:09 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Nora Abdo  
[nabdo20@gmail.com](mailto:nabdo20@gmail.com)

**From:** ["Jessica Mitchell-Shihabi"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:42:06 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Jessica Mitchell-Shihabi  
[jmshihabi@gmail.com](mailto:jmshihabi@gmail.com)

**From:** [Federico Bortoletto](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:36:07 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Federico Bortoletto  
[federico.bortoletto@alice.it](mailto:federico.bortoletto@alice.it)

**From:** [Karen Slote](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:32:17 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Karen Slote  
[wzardglick@roadrunner.com](mailto:wzardglick@roadrunner.com)

**From:** [Alison Kilmer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:20:19 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Alison Kilmer  
[alison@goodhonestbrands.com](mailto:alison@goodhonestbrands.com)

**From:** [Eve Angle](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:17:08 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Eve Angle  
[eve\\_angle1@yahoo.com](mailto:eve_angle1@yahoo.com)

**From:** [Jacques van Zyl](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:11:16 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Jacques van Zyl  
[grey@phi-audio.com](mailto:grey@phi-audio.com)



**From:** [Nigel Cochran](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:10:15 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Nigel Cochran  
[Nigeblue2@hotmail.com](mailto:Nigeblue2@hotmail.com)

**From:** [Ingrid DuBois](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:51:06 AM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

“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.”

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS’ plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS’ plan.

Sincerely,  
Ingrid DuBois  
[ingride@infionline.net](mailto:ingride@infionline.net)

**From:** [Kathy Ruopp](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:50:13 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

"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."

Please protect the native tule elk from being culled in our National Seashore.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Kathy Ruopp  
[kathyruopp@cs.com](mailto:kathyruopp@cs.com)

**From:** [Colleen Lobel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:50:08 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS’ plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS’ and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS’ plan, and find the plan not consistent.

Sincerely,  
Colleen Lobel  
[clobel1@san.rr.com](mailto:clobel1@san.rr.com)

**From:** [Zorina Kibrick](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:39:08 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Zorina Kibrick  
[zkibrick@gmail.com](mailto:zkibrick@gmail.com)

**From:** [Dave Sumner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:31:06 AM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Dave Sumner  
[davesmessage@hotmail.com](mailto:davesmessage@hotmail.com)

**From:** [Diane Gentile](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:29:10 AM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Diane Gentile  
[dianegentile@gmail.com](mailto:dianegentile@gmail.com)

**From:** ["K. Rice"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:08:14 AM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

"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."

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
K. Rice  
[kyradear@gmail.com](mailto:kyradear@gmail.com)



**From:** [Nancy Freyer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:08:08 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Cows produce 150 billion gallons of methane per day.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Nancy Freyer  
[nancyberning@hotmail.com](mailto:nancyberning@hotmail.com)

**From:** [Margaret Hill](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 11:04:08 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Margaret Hill  
[mhill6298@gmail.com](mailto:mhill6298@gmail.com)

**From:** [Joel Fithian](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:59:11 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Joel Fithian  
[joelfithian@mac.com](mailto:joelfithian@mac.com)

**From:** [Melissa McTague](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:54:08 AM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Melissa McTague

**From:** [DEBORAH SMITH](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:42:10 AM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
DEBORAH SMITH  
[deborah993@cox.net](mailto:deborah993@cox.net)

**From:** [Constance Artis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:39:06 AM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Constance Artis  
[connieartis@yahoo.com](mailto:connieartis@yahoo.com)

**From:** [Irene Dobrzanski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:28:08 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Irene Dobrzanski  
[i\\_dobrz@yahoo.com](mailto:i_dobrz@yahoo.com)

**From:** [Joan Ellen Mccoy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:21:20 AM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Joan Ellen Mccoy  
[jrmccoy598@sbcglobal.net](mailto:jrmccoy598@sbcglobal.net)



**From:** [Diana E Smith](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:19:10 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Diana E Smith  
[monet7936@hotmail.com](mailto:monet7936@hotmail.com)

**From:** [Cara Schmidt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:17:21 AM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Cara Schmidt  
[cmst3@hotmail.com](mailto:cmst3@hotmail.com)

**From:** [Ruby Nieto](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:14:08 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Ruby Nieto  
[prinwarr@yahoo.com](mailto:prinwarr@yahoo.com)

**From:** ["K. Rice"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:10:19 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
K. Rice  
kyradear@gmail.com

**From:** [kristin Reed](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 10:08:11 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary.and caution that these approaches are greenwashing attempts, like "Clean Coal."

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
kristin Reed  
[reedkmb@gmail.com](mailto:reedkmb@gmail.com)

**From:** [katharine odell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:58:25 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS’ own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnne's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

The NPS is being sued because the NPS’ Plan is violating the NPS’ own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS’ plan inconsistent with the Coastal Act.

Sincerely,  
katharine odell  
[khodell@wisc.edu](mailto:khodell@wisc.edu)

**From:** [Angela Knable](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:57:11 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Angela Knable  
[aknable@mdmlaw.com](mailto:aknable@mdmlaw.com)

**From:** [Andrea Schmitz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:55:10 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Andrea Schmitz  
[andrea-mail@gmx.net](mailto:andrea-mail@gmx.net)



**From:** [Joshua Konheim Heffron](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:54:08 AM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Joshua Konheim Heffron  
[piratedragon73@aol.com](mailto:piratedragon73@aol.com)

**From:** [Tanya Piker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:44:12 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Tanya Piker  
[tanyapiker@hotmail.com](mailto:tanyapiker@hotmail.com)

**From:** [Julie Hansen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:42:15 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Julie Hansen  
[julieellen56@gmail.com](mailto:julieellen56@gmail.com)

**From:** [Petra Jones](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:42:09 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don’t capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden’s desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a ‘management threshold.’ Please note there is no science behind the NPS’ number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Petra Jones  
[petra.jones@bigpond.com](mailto:petra.jones@bigpond.com)

**From:** [Mark Hanley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:23:10 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

Kindly act in the best interest of the public good.

Sincerely,  
Mark Hanley  
[amarksupreme@gmail.com](mailto:amarksupreme@gmail.com)

**From:** [William G Gonzalez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:22:08 AM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
William G Gonzalez  
[wgonzalezgarcia@yahoo.com](mailto:wgonzalezgarcia@yahoo.com)

**From:** [Lisa Keim](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:20:08 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Lisa Keim  
[andrews@chapman.com](mailto:andrews@chapman.com)

**From:** [Patricia Schmidt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:15:07 AM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.



**From:** [Susannah Sebanc](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:14:14 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Susannah Sebanc  
[virtuallslvs@yahoo.com](mailto:virtuallslvs@yahoo.com)

**From:** [Marianna Riser](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:06:17 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Marianna Riser  
[mmrrser@gmail.com](mailto:mmrrser@gmail.com)

**From:** [Renee Woodman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 9:06:11 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

The NPS’ Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Renee Woodman  
[ladygrnthumb@gmail.com](mailto:ladygrnthumb@gmail.com)

**From:** [Pamylle Greinke](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:58:07 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Pamylle Greinke  
[pamylle1@gmail.com](mailto:pamylle1@gmail.com)

**From:** [Faith Franck](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:50:15 AM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Faith Franck  
ffranck1@yahoo.com

**From:** [Rebecca Harper](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:48:15 AM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Rebecca Harper  
[bharper@ucla.edu](mailto:bharper@ucla.edu)

**From:** [David DeSante](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:48:08 AM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
David DeSante  
[ddesante@birdpop.org](mailto:ddesante@birdpop.org)

**From:** [David DeSante](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:47:08 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).



**From:** [Brooke Moncrieff](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:46:11 AM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Brooke Moncrieff  
[seafrog@rcn.com](mailto:seafrog@rcn.com)

**From:** [Tristan Sophia](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:31:08 AM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Tristan Sophia  
[tristan9593@gmail.com](mailto:tristan9593@gmail.com)

**From:** [William McMullin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:19:07 AM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

**From:** [leslie lund](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:18:09 AM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
leslie lund  
[leslielund@hotmail.com](mailto:leslielund@hotmail.com)

**From:** [Nora Allen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:10:16 AM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS’ plan. The impacts of ranching in PRNS is well documented in the NPS’ own EIS - ranching must end in PRNS.

Sincerely,  
Nora Allen  
[maxdallen@ameritech.net](mailto:maxdallen@ameritech.net)

**From:** [Lori Brawner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:08:08 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Lori Brawner  
[marinabludolphin@gmail.com](mailto:marinabludolphin@gmail.com)

**From:** [james a hughes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:07:13 AM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
james a hughes  
[starman22461@hotmail.com](mailto:starman22461@hotmail.com)

**From:** [Fred Fall](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:03:21 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

US Methane emissions from livestock and natural gas are nearly equal.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Fred Fall  
[fred08034@gmail.com](mailto:fred08034@gmail.com)



**From:** [Sal Bobow](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:03:17 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher’s plan.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS’ plan.

Sincerely,  
Sal Bobow  
[lilcauses@gmail.com](mailto:lilcauses@gmail.com)

**From:** [SABINA PINTO](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:03:12 AM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
SABINA PINTO  
sibbyp48@gmail.com

**From:** [Dymphna Agos](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:02:15 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Dymphna Agos  
woofdog402@comcast.net

**From:** [Tony Menechella](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 8:02:12 AM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Tony Menechella  
[sondalei@gmail.com](mailto:sondalei@gmail.com)

**From:** [margo wyse](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:54:14 AM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
margo wyse  
[bodica6086@yahoo.com](mailto:bodica6086@yahoo.com)

**From:** [Dick Merrill](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:52:09 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Dick Merrill  
[bluescat@deliveryman.com](mailto:bluescat@deliveryman.com)

**From:** [steve lucas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:49:13 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (Enterococcus is another large genus of bacteria)."

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

**From:** [Claire De Coninck](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:47:08 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Claire De Coninck  
[claire@clairedeconinck.com](mailto:claire@clairedeconinck.com)



**From:** [Anne Eastman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:43:09 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Anne Eastman

**From:** [Michael Hynes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:41:10 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Michael Hynes  
[mhynes1@metlife.com](mailto:mhynes1@metlife.com)

**From:** [Michael Hynes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:41:07 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Michael Hynes  
[mhynes1@metlife.com](mailto:mhynes1@metlife.com)

**From:** [Ronnie Bolling](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:38:11 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Ronnie Bolling  
[ronmanbolling@gmail.com](mailto:ronmanbolling@gmail.com)

**From:** [Christopher Lish](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:33:05 AM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Kindly act in the best interest of the public good.

Sincerely,  
Christopher Lish  
[lishchris@yahoo.com](mailto:lishchris@yahoo.com)

**From:** [Laura Sueoka](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:29:06 AM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Laura Sueoka  
[laura.sueoka@gmail.com](mailto:laura.sueoka@gmail.com)

**From:** [Robin Pappas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:28:08 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Robin Pappas  
[wakeupandsmellthedog@hotmail.com](mailto:wakeupandsmellthedog@hotmail.com)

**From:** [Joanne Cockerill](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:22:10 AM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.



**From:** [Joanne Cockerill](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:22:09 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Joanne Cockerill  
[joannecockerill@hotmail.com](mailto:joannecockerill@hotmail.com)

**From:** [Irene Osborn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:20:13 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Please protect the native tule elk from being culled in our National Seashore.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Irene Osborn  
[taguasy@hotmail.com](mailto:taguasy@hotmail.com)

**From:** [Robert McArtor](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:18:08 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Robert McArtor  
[robert\\_mcartor@bellsouth.net](mailto:robert_mcartor@bellsouth.net)

**From:** [Helen Fisher](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:12:08 AM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Helen Fisher  
[hmfisher416@gmail.com](mailto:hmfisher416@gmail.com)

**From:** [Susan Conway](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:09:12 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Methane has a global warming potential 86 times that of CO<sub>2</sub> on a 20-year time frame.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Susan Conway  
[susanmconway@yahoo.com](mailto:susanmconway@yahoo.com)

**From:** [Cynthia Arnold](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:09:10 AM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

**From:** [Ken Mundy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:06:08 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Ken Mundy  
[kendrum@aol.com](mailto:kendrum@aol.com)

**From:** [Marian Hussenbux](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:04:09 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Marian Hussenbux  
[mhussenbux@btinternet.com](mailto:mhussenbux@btinternet.com)



**From:** [Kathy Nix](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 7:01:08 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Kathy Nix  
[katkat2000@email.com](mailto:katkat2000@email.com)

**From:** [Michael Talbot](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:59:08 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Michael Talbot  
[talbot.nkt@gmail.com](mailto:talbot.nkt@gmail.com)

**From:** [Michael Zeller](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:56:08 AM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

**From:** [Christopher Feehan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:48:08 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Kindly act in the best interest of the public good.

Sincerely,  
Christopher Feehan  
[cjfeehan@hotmail.com](mailto:cjfeehan@hotmail.com)

**From:** [Elizabeth Seltzer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:45:09 AM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Elizabeth Seltzer  
ees01@earthlink.net

**From:** [Elizabeth Seltzer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:41:12 AM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Elizabeth Seltzer  
ees01@earthlink.net

**From:** [Elizabeth Seltzer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:41:06 AM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Elizabeth Seltzer  
ees01@earthlink.net

**From:** [Kerthy Hearn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:40:15 AM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

“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.”

Please provide our native Tule Elk from the NPS’ and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Kerthy Hearn  
[kerthyfix@gmail.com](mailto:kerthyfix@gmail.com)



**From:** [Elizabeth Seltzer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:40:11 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Elizabeth Seltzer  
[ees01@earthlink.net](mailto:ees01@earthlink.net)

**From:** [Sandra Boylston](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:39:12 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

US Methane emissions from livestock and natural gas are nearly equal.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Sandra Boylston  
[cyclinsandy@yahoo.com](mailto:cyclinsandy@yahoo.com)

**From:** [Kenneth Robertson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:30:15 AM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Kenneth Robertson  
[kcrmusic@kc.rr.com](mailto:kcrmusic@kc.rr.com)

**From:** [David R Wilcox](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:25:11 AM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
David R Wilcox  
[moink64@yahoo.com](mailto:moink64@yahoo.com)

**From:** [Phillippa Hilsden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:13:14 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Please protect the native tule elk from being culled in our National Seashore.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Phillippa Hilsden  
[fluffykittens55@protonmail.com](mailto:fluffykittens55@protonmail.com)

**From:** [LESLIE COHEN](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:10:09 AM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
LESLIE COHEN  
[lcohen@sjindustries.com](mailto:lcohen@sjindustries.com)

**From:** [CHRIS ESCAMILLA](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:05:14 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
CHRIS ESCAMILLA  
[cescamilla@miyokoskitchen.com](mailto:cescamilla@miyokoskitchen.com)

**From:** [Denise Brown](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 6:02:08 AM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Denise Brown  
[gnaturecenter@yahoo.com](mailto:gnaturecenter@yahoo.com)



**From:** [Robert Estren](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:50:07 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Robert Estren  
[worldnurse1@icloud.com](mailto:worldnurse1@icloud.com)

**From:** [Michelle Macy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:48:09 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Michelle Macy  
[mmacyartist@yahoo.com](mailto:mmacyartist@yahoo.com)

**From:** [Terri Faircloth](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:45:07 AM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Terri Faircloth  
terril107@gmail.com

**From:** [Rax Green](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:41:10 AM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Rax Green  
[mabukkit@gmail.com](mailto:mabukkit@gmail.com)

**From:** [RICHARD BAKER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:37:11 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
RICHARD BAKER  
[penpoint@hvc.rr.com](mailto:penpoint@hvc.rr.com)

**From:** [Diane TALBOT](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:22:08 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Diane TALBOT  
dshellyt@yahoo.com

**From:** [Richard Heinlein](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:21:06 AM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Richard Heinlein  
[muhwase@yahoo.com](mailto:muhwase@yahoo.com)

**From:** [Tiffany Carder](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:13:11 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Tiffany Carder  
[tlcarder@aol.com](mailto:tlcarder@aol.com)



**From:** [Elizabeth Metcalf](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 5:00:11 AM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

US Methane emissions from livestock and natural gas are nearly equal.

Please protect the native tule elk from being culled in our National Seashore.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Elizabeth Metcalf  
lizmetcalf1@hotmail.com

**From:** [Cristen McConvillw](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:55:08 AM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Cristen McConvillw  
[mikla\\_2000@yahoo.com](mailto:mikla_2000@yahoo.com)

**From:** [Kathy Shoemaker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:47:06 AM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Kathy Shoemaker  
cpcastar@aol.com

**From:** [Tasha Taylor](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:41:07 AM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

US Methane emissions from livestock and natural gas are nearly equal.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Tasha Taylor  
[tashirs151@yahoo.com](mailto:tashirs151@yahoo.com)

**From:** [Franziska Schleiter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:36:07 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

The Commission’s post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore’s waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC’s deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Assuming the NPS’ strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg “The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock “does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate.” The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS’ strategy.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,

**From:** [William Forbes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:32:07 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
William Forbes  
[bforbes04@gmail.com](mailto:bforbes04@gmail.com)

**From:** [William Forbes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:31:14 AM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

“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.”

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS’ plan (CD-0006-02)

Sincerely,  
William Forbes  
bforbes04@gmail.com

**From:** [Tristan Sophia](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:30:13 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Kindly act in the best interest of the public good.

Sincerely,  
Tristan Sophia  
[tristan9593@gmail.com](mailto:tristan9593@gmail.com)



**From:** [Jasmin Engel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:20:08 AM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Jasmin Engel  
[merastorphina@yahoo.de](mailto:merastorphina@yahoo.de)

**From:** [Dianne Buckley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 4:11:07 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Dianne Buckley  
[mentorforyou@aol.com](mailto:mentorforyou@aol.com)

**From:** [Jeaneen Andretta](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:59:08 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Jeaneen Andretta

**From:** [alice van leunen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:56:06 AM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
alice van leunen  
[avanleunen@msn.com](mailto:avanleunen@msn.com)

**From:** [Manuela Broechin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:38:08 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Manuela Broechin  
[mbroechin@yahoo.com](mailto:mbroechin@yahoo.com)

**From:** [Jo Chapman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:30:08 AM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Jo Chapman  
[jochapman1944@gmail.com](mailto:jochapman1944@gmail.com)

**From:** [Catarina Sacadura](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:21:07 AM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Catarina Sacadura  
[aragao\\_sacadura@hotmail.com](mailto:aragao_sacadura@hotmail.com)

**From:** [B Nordenholz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 3:18:08 AM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
B Nordenholz  
[betsybetsyn@aol.com](mailto:betsybetsyn@aol.com)



**From:** [M S Dillon III](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:40:09 AM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

"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."

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
M S Dillon III  
[msdillon@earthlink.net](mailto:msdillon@earthlink.net)

**From:** [Pascal Girault](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:31:08 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on "best management practices", but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Pascal Girault  
[pascal.girault.78@free.fr](mailto:pascal.girault.78@free.fr)

**From:** [Pascal Girault](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:30:09 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Pascal Girault  
[pascal.girault.78@free.fr](mailto:pascal.girault.78@free.fr)

**From:** [hannes jaenicke](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 2:19:07 AM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
hannes jaenicke  
[jaenickehannes@aol.com](mailto:jaenickehannes@aol.com)

**From:** ["Jan-Paul Alon"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:55:09 AM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Jan-Paul Alon  
[Jpalon@yahoo.com](mailto:Jpalon@yahoo.com)

**From:** [Pela Tomasello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:51:06 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Pela Tomasello  
[p\\_tomasello@yahoo.com](mailto:p_tomasello@yahoo.com)

**From:** [Cecily Colloby](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:44:09 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Cecily Colloby  
[email@cecilycolloby.plus.com](mailto:email@cecilycolloby.plus.com)

**From:** [Charity Moschopoulos](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:37:06 AM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Charity Moschopoulos  
[charity.rome@hotmail.com](mailto:charity.rome@hotmail.com)



**From:** [colonel meyer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:36:07 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
colonel meyer  
ronm430@aol.com

**From:** [Bjarke Pedersen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:32:07 AM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Bjarke Pedersen  
[bjarkefredskild@gmail.com](mailto:bjarkefredskild@gmail.com)

**From:** [Sabrina Cohrs](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:27:06 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Sabrina Cohrs  
[simmerda@gmail.com](mailto:simmerda@gmail.com)

**From:** [Bodhi Amala](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:15:09 AM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Bodhi Amala  
[bodhiamala108@gmail.com](mailto:bodhiamala108@gmail.com)

**From:** ["Flávio Mendonça"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:11:10 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

US Methane emissions from livestock and natural gas are nearly equal.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Flávio Mendonça  
flaviTo81@hotmail.com

**From:** [Anna Jasiukiewicz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:11:08 AM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Anna Jasiukiewicz  
[irbis77@wp.pl](mailto:irbis77@wp.pl)

**From:** [Sara Fontani](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:08:06 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Sara Fontani  
[safontani@gmail.com](mailto:safontani@gmail.com)

**From:** [Tanja Porttila](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 1:05:08 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Tanja Porttila  
[tanjaporttila@hotmail.com](mailto:tanjaporttila@hotmail.com)



**From:** [MAnuela Tietsch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:55:15 AM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

“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.”

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

The NPS is being sued because the NPS’ Plan is violating the NPS’ own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS’ plan inconsistent with the Coastal Act.

Sincerely,  
MAnuela Tietsch  
[motkunst@yahoo.de](mailto:motkunst@yahoo.de)

**From:** ["Zdzisław Baran"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:54:08 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Zdzisław Baran  
[zdzychu1954@gmail.com](mailto:zdzychu1954@gmail.com)

**From:** [Maria Baran](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:54:07 AM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

It is of great concern politicians at the local and federal level support the NPS’s actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Maria Baran  
[Maria.baran@vp.pl](mailto:Maria.baran@vp.pl)

**From:** ["Paweł Kanafek"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:53:12 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Paweł Kanafek  
[kanafek@gmail.com](mailto:kanafek@gmail.com)

**From:** [Paulina Baran](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:53:08 AM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

US Methane emissions from livestock and natural gas are nearly equal.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Paulina Baran  
[baranpaulin@gmail.com](mailto:baranpaulin@gmail.com)

**From:** [MIRIAM IOSUPOVICI](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:40:11 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Please protect the native tule elk from being culled in our National Seashore.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
MIRIAM IOSUPOVICI  
zevsmom@gmail.com

**From:** [Jocelyne Pinque](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:38:07 AM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Jocelyne Pinque  
[jocelynepinque@yahoo.fr](mailto:jocelynepinque@yahoo.fr)

**From:** [Meryl Pinque](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:36:08 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Meryl Pinque  
[merylpinque@gmail.com](mailto:merylpinque@gmail.com)



**From:** [George Gorohoff](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:22:07 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
George Gorohoff  
[zaybertamer@gmail.com](mailto:zaybertamer@gmail.com)

**From:** [Quentin Fischer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Thursday, March 31, 2022 12:06:06 AM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Quentin Fischer  
[fischerq@yahoo.com](mailto:fischerq@yahoo.com)

**From:** [Klaus Franzen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:58:09 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

US Methane emissions from livestock and natural gas are nearly equal.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johne's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Klaus Franzen  
[klaus.franzen@web.de](mailto:klaus.franzen@web.de)

**From:** [Chantal Van Beveren](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:58:07 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Chantal Van Beveren  
[ch.van.beveren@telenet.be](mailto:ch.van.beveren@telenet.be)

**From:** [Charles Roth](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:53:08 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.’s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of “Clean Coal.” I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS’ plan, as it is time to end these unnecessary impacts.

Sincerely,  
Charles Roth  
[CMRdesignCA@gmail.com](mailto:CMRdesignCA@gmail.com)

**From:** [Dagmar Leischow](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:49:07 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Dagmar Leischow  
[d\\_leischow@hotmail.com](mailto:d_leischow@hotmail.com)

**From:** [Paula Till](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:30:13 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Paula Till  
[paula.till831@gmail.com](mailto:paula.till831@gmail.com)

**From:** [Mary Finelli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:30:12 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore’s GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an ‘off-set’.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Mary Finelli  
[MaryFinelli@comcast.net](mailto:MaryFinelli@comcast.net)



**From:** [Elsy Shallman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:30:08 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Elsy Shallman  
[gomerlu11@gmail.com](mailto:gomerlu11@gmail.com)

**From:** [Gloria Grotjan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:27:08 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [Elisabeth Ritter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:26:08 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Elisabeth Ritter  
[info@tierhilfe-zarzis.de](mailto:info@tierhilfe-zarzis.de)

**From:** [bob senko](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:14:09 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,

**From:** [Ronen Golan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:13:08 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Cows produce 150 billion gallons of methane per day.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Ronen Golan  
[ronengolan@gmail.com](mailto:ronengolan@gmail.com)

**From:** [Joseph Risetto](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:12:11 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Joseph Risetto  
[leshii927@hotmail.com](mailto:leshii927@hotmail.com)

**From:** [Santa Meikalisa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:12:09 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Santa Meikalisa

**From:** [Tracy Templin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:07:19 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Tracy Templin



**From:** [Catherine Martin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:07:18 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Catherine Martin  
[martin.brown@htp-tel.de](mailto:martin.brown@htp-tel.de)

**From:** [Zhanel Abildayeva](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:07:10 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

**From:** [Christina Nillo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:07:07 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Christina Nillo  
[seamusminnie@att.net](mailto:seamusminnie@att.net)

**From:** ["W. G."](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:04:07 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
W. G.  
seapink2@gmail.com

**From:** [Dana Grunwald](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:56:09 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Dana Grunwald  
[molly-bloom@web.de](mailto:molly-bloom@web.de)

**From:** [Erika Liere](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:56:07 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Erika Liere  
[erika-liere@t-online.de](mailto:erika-liere@t-online.de)

**From:** ["Anna Gainey-Vejar"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:53:06 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Anna Gainey-Vejar  
[againyvejar@gmail.com](mailto:againyvejar@gmail.com)

**From:** ["Anna Gainey-Vejar"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:52:09 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Anna Gainey-Vejar  
[againyvejar@gmail.com](mailto:againyvejar@gmail.com)



**From:** [Emily Thwaite](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:52:07 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Emily Thwaite  
[emilyjanethwaite@icloud.com](mailto:emilyjanethwaite@icloud.com)

**From:** [Emily Thwaite](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:51:10 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

**From:** [Lois Cheesman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:51:06 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Lois Cheesman  
[loische@yahoo.com](mailto:loische@yahoo.com)

**From:** [Helga Romp](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:37:09 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

"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."

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Helga Romp  
[helgaromp@t-online.de](mailto:helgaromp@t-online.de)

**From:** [Bonnie Svec](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:37:07 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are "technically or financially infeasible" and "in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS"

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Bonnie Svec  
[fruitcakes101@aol.com](mailto:fruitcakes101@aol.com)

**From:** [Eleanor Prugh](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:36:06 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Eleanor Prugh  
[eleanactor77@gmail.com](mailto:eleanactor77@gmail.com)

**From:** [JOHN HARRIS](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:34:06 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like “Clean Coal.”

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
JOHN HARRIS  
[johnharri9@att.net](mailto:johnharri9@att.net)

**From:** [Sheila Dixon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:32:06 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

US Methane emissions from livestock and natural gas are nearly equal.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Sheila Dixon  
[sdixon429@comcast.net](mailto:sdixon429@comcast.net)



**From:** [J Lasahn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:20:07 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
J Lasahn

**From:** [Margaret Goodman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:09:07 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Margaret Goodman  
[mrssgwg@gmail.com](mailto:mrssgwg@gmail.com)

**From:** [LILIANA PAPANIKOLAOU](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:08:08 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
LILIANA PAPANIKOLAOU  
ASKOSLILI@GMAIL.COM

**From:** [TERESA PITTS](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:00:08 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
TERESA PITTS  
[tgpitts@earthlink.net](mailto:tgpitts@earthlink.net)

**From:** [Jody Goldstein](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:57:06 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Jody Goldstein  
[jody@goldsteinonline.com](mailto:jody@goldsteinonline.com)

**From:** [Bassam Imam](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:49:10 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS’ plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS’ plan.

Sincerely,  
Bassam Imam  
[CleanEarth1400@hotmail.com](mailto:CleanEarth1400@hotmail.com)

**From:** [Gavin Bornholtz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:44:16 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Gavin Bornholtz  
GBglide@comcast.net

**From:** [Charrie Janzen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:44:11 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Charrie Janzen  
[cgjanzen@gmail.com](mailto:cgjanzen@gmail.com)



**From:** [Charrie Janzen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:44:07 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Charrie Janzen  
[cgjanzen@gmail.com](mailto:cgjanzen@gmail.com)

**From:** [Alisa Houpt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:43:07 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Alisa Houpt  
[alisa\\_houpt@yahoo.com](mailto:alisa_houpt@yahoo.com)

**From:** [Todd Steiner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:41:08 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Todd Steiner  
[tsteiner@tirn.net](mailto:tsteiner@tirn.net)

**From:** [romelia salomon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:38:10 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Upon close reading of the EIS for the GMPA, it’s clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
romelia salomon  
[romesalomon@hotmail.com](mailto:romesalomon@hotmail.com)

**From:** [Anita Youabian](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:38:08 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Kindly act in the best interest of the public good.

Sincerely,  
Anita Youabian  
[anitay22@hotmail.com](mailto:anitay22@hotmail.com)

**From:** [Diane Moore](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:26:08 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let’s use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS’ Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Diane Moore  
[geodian@sbcglobal.net](mailto:geodian@sbcglobal.net)

**From:** [Therese DeBing](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:24:08 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Therese DeBing  
[buddhabear88@hotmail.com](mailto:buddhabear88@hotmail.com)

**From:** [Catherine Krug](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:21:08 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Catherine Krug  
[glidezone@aol.com](mailto:glidezone@aol.com)



**From:** [Sheila Cowden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:19:07 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

Please protect the native tule elk from being culled in our National Seashore.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Sheila Cowden  
[sheilacowden@ahoo.com](mailto:sheilacowden@ahoo.com)

**From:** ["E.M. Mann"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:18:11 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
E.M. Mann  
[emkadmin-ec@yahoo.com](mailto:emkadmin-ec@yahoo.com)

**From:** [Brian Browne](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:09:08 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Brian Browne  
[brian6browne@gmail.com](mailto:brian6browne@gmail.com)

**From:** [joe smith](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:08:09 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS’ plan. The impacts of ranching in PRNS is well documented in the NPS’ own EIS - ranching must end in PRNS.

Sincerely,  
joe smith  
[memoriesjc@Hotmail.com](mailto:memoriesjc@Hotmail.com)

**From:** [Samantha Solomon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:08:06 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Samantha Solomon  
[sollmon@comcast.net](mailto:sollmon@comcast.net)

**From:** [Brian Browne](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:06:06 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Brian Browne  
[bjbbirds@yahoo.com](mailto:bjbbirds@yahoo.com)

**From:** [Julie Herrod](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:05:07 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Julie Herrod  
[jherrod9@gmail.com](mailto:jherrod9@gmail.com)

**From:** [Roger Rose](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:04:07 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Roger Rose  
[onemaringuy@gmail.com](mailto:onemaringuy@gmail.com)



**From:** [Daniel Zarett](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:56:09 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Cows produce 150 billion gallons of methane per day.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Daniel Zarett  
[dzarett@yahoo.com](mailto:dzarett@yahoo.com)

**From:** [Anita Wisch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:54:07 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Anita Wisch  
[awisch629@aol.com](mailto:awisch629@aol.com)

**From:** [Laura Utrecht](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:52:05 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Laura Utrecht  
[fifilu@sbcglobal.net](mailto:fifilu@sbcglobal.net)

**From:** [Doris Rodriguez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:48:08 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Kindly act in the best interest of the public good.

Sincerely,  
Doris Rodriguez  
[33littletree@gmail.com](mailto:33littletree@gmail.com)

**From:** [Susan Ross](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:37:09 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Upon close reading of the EIS for the GMPA, it’s clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Per the NPS’ own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Susan Ross  
[susanrosscreative@gmail.com](mailto:susanrosscreative@gmail.com)

**From:** [Danuta Radko](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:32:18 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Danuta Radko  
[danutaradko@aol.com](mailto:danutaradko@aol.com)

**From:** [Lori Kegler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:32:07 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Lori Kegler  
[lori.kegler@gmail.com](mailto:lori.kegler@gmail.com)

**From:** ["Deborah Filipelli, PhD"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:28:10 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore’s GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an ‘off-set’.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, “The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention.” This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS’s extensive past history, the Commission can expect more of the same. It’s important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Deborah Filipelli, PhD  
[dfilipelli@mcn.org](mailto:dfilipelli@mcn.org)



**From:** ["Mr. Scott Dale Deering"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:28:09 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Mr. Scott Dale Deering

**From:** [Rajesh Venkateswaran](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:25:18 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Rajesh Venkateswaran  
[rsv1973@yahoo.com](mailto:rsv1973@yahoo.com)

**From:** [Elizabeth Jache](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:25:08 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

**From:** [Robert Kurz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:23:07 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Robert Kurz  
[rkurz@hotmail.com](mailto:rkurz@hotmail.com)

**From:** [christina jaqua](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:20:08 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
christina jaqua  
chrisjaq@att.net

**From:** [Doris Rodriguez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:19:16 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The impacts of ranching in PRNS is well documented in the NPS’ own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Doris Rodriguez  
[33littletree@gmail.com](mailto:33littletree@gmail.com)

**From:** [Kathy Rohr](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:18:07 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

The CCC should not approve of a Climate Action Strategy from the NPS that can’t prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Kathy Rohr  
[katrohr61@outlook.com](mailto:katrohr61@outlook.com)

**From:** [Maureen Porcelli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:17:07 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Maureen Porcelli  
[am.curious.sometimes@gmail.com](mailto:am.curious.sometimes@gmail.com)



**From:** [Louis Vega](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:16:07 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Louis Vega  
[louisvega@mac.com](mailto:louisvega@mac.com)

**From:** [Janice Saylock](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:13:12 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Janice Saylock  
[jansthreecats@yahoo.com](mailto:jansthreecats@yahoo.com)

**From:** [Janice Saylock](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:13:09 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Janice Saylock  
[jansthreecats@yahoo.com](mailto:jansthreecats@yahoo.com)

**From:** [Kathryn Rose](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:13:07 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Kindly act in the best interest of the public good.

Sincerely,  
Kathryn Rose  
[mizkate52@msn.com](mailto:mizkate52@msn.com)

**From:** [Jamie Kurnik](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:10:07 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Jamie Kurnik  
[amiejlyn@hotmail.com](mailto:amiejlyn@hotmail.com)

**From:** [Kathleen Gualtieri](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:09:08 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Kathleen Gualtieri  
[kategvp@gmail.com](mailto:kategvp@gmail.com)

**From:** [Ellen Ayalin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:08:07 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Ellen Ayalin  
[alaska1896@yahoo.com](mailto:alaska1896@yahoo.com)

**From:** [Elsie Venegas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:07:12 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Elsie Venegas  
[elsie.venegas@yahoo.com](mailto:elsie.venegas@yahoo.com)



**From:** [Erico Martins](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:07:07 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Erico Martins  
[e-fernandes-martins@uol.com.br](mailto:e-fernandes-martins@uol.com.br)

**From:** [Elizabeth Osborne](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:03:09 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Elizabeth Osborne  
[greenknight@cox.net](mailto:greenknight@cox.net)

**From:** [Hannah Gardner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:01:10 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Hannah Gardner  
[hannahgardne@hotmail.com](mailto:hannahgardne@hotmail.com)

**From:** [Patti Mckinley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:01:07 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Patti Mckinley  
[princesspattimckinley@gmail.com](mailto:princesspattimckinley@gmail.com)

**From:** [barry farley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:56:11 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
barry farley  
[farlet.barry@comcast.net](mailto:farlet.barry@comcast.net)

**From:** [Vanessa Seay](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:56:09 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Vanessa Seay  
Suzie1149@GMAIL.COM

**From:** [Lisa Wilson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:53:13 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Lisa Wilson  
[makeupdiva@live.com](mailto:makeupdiva@live.com)

**From:** [Rebecca Goodrich](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:50:07 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Rebecca Goodrich  
[scribing@hotmail.com](mailto:scribing@hotmail.com)



**From:** [Sharon Nishio](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:49:10 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a ‘management threshold.’ Please note there is no science behind the NPS’ number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Sharon Nishio

**From:** ["Crystal Smith-Connelly"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:49:06 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Crystal Smith-Connelly  
[rockstar1231@yahoo.com](mailto:rockstar1231@yahoo.com)

**From:** [Gavin Dillard](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:46:12 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Gavin Dillard  
[gavco@me.com](mailto:gavco@me.com)

**From:** [Patricia Nazzaro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:45:12 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnne's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Patricia Nazzaro  
pasn201@yahoo.com

**From:** [Margo Salone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:43:08 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Margo Salone  
[margosalone@live.com](mailto:margosalone@live.com)

**From:** [Patricia Murphy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:41:09 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Patricia Murphy  
[murphy.patricia@live.com](mailto:murphy.patricia@live.com)

**From:** [Andrelene Babbitt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:33:08 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Andrelene Babbitt  
[mikicats2@hotmail.com](mailto:mikicats2@hotmail.com)

**From:** [Rosalind Andrews](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:30:09 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Rosalind Andrews  
[rozyandrewsms@bellsouth.net](mailto:rozyandrewsms@bellsouth.net)



**From:** [Tony Espinosa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:29:08 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels of E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact on marine life in the ocean.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS are well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Tony Espinosa  
tennisball31@aol.com

**From:** [Lynne Scanlon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:25:11 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don’t even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Lynne Scanlon  
[lrez30@yahoo.com](mailto:lrez30@yahoo.com)

**From:** [Geoff Simmons](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:25:07 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

The CCC’s mission is to protect and enhance the California coast. It reads “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.”

Per the CCC’s mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [Maureen Knutsen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:22:08 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Maureen Knutsen  
[maureen.knutsen@gmail.com](mailto:maureen.knutsen@gmail.com)

**From:** [Maeven McGovern](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:20:14 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Maeven McGovern  
[maevenm@gmail.com](mailto:maevenm@gmail.com)

**From:** [Jim Allsopp](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:20:09 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Jim Allsopp  
[jim@goodhonestbrands.com](mailto:jim@goodhonestbrands.com)

**From:** [Janell Copello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:20:09 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Janell Copello  
[janell.copello@yahoo.com](mailto:janell.copello@yahoo.com)

**From:** [C K](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:18:11 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Kindly act in the best interest of the public good.

Sincerely,  
C K  
[WinterLightningI@gmail.com](mailto:WinterLightningI@gmail.com)



**From:** [Julia Skelton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:17:12 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Julia Skelton  
[julieskelton@msn.com](mailto:julieskelton@msn.com)

**From:** [Marty Bostic](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:17:10 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Marty Bostic  
[sbost23@hotmail.com](mailto:sbost23@hotmail.com)

**From:** [Maryann Barulich](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:17:05 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Maryann Barulich

**From:** [Mercedes Lackey](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:15:10 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Mercedes Lackey  
[helloelsie@gmail.com](mailto:helloelsie@gmail.com)

**From:** [Nina Vera](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:13:07 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Nina Vera  
[ninadiamante321@yahoo.com](mailto:ninadiamante321@yahoo.com)

**From:** [Irene Lopez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:08:11 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Irene Lopez  
adolfolopez13@gmail.com

**From:** [Christina Babst](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:06:07 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Christina Babst  
[seamusminnie@hotmail.com](mailto:seamusminnie@hotmail.com)



**From:** [Kathryn Morrow](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:05:10 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Kathryn Morrow  
[worrom@gmail.com](mailto:worrom@gmail.com)

**From:** [Elizabeth Katz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:04:11 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Elizabeth Katz  
[thomkatzmx@gmail.com](mailto:thomkatzmx@gmail.com)

**From:** [LESLIE Mueller](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:01:13 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a ‘management threshold.’ Please note there is no science behind the NPS’ number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
LESLIE Mueller  
[morelee1018@yahoo.com](mailto:morelee1018@yahoo.com)

**From:** [Brian Zidian](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:01:09 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Brian Zidian  
[beanskeithz@gmail.com](mailto:beanskeithz@gmail.com)

**From:** [Clare Hedin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:59:08 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Kindly act in the best interest of the public good.

Sincerely,  
Clare Hedin  
[clare@clarehedin.com](mailto:clare@clarehedin.com)

**From:** [Gale Wallach](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:57:13 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Gale Wallach  
[oboe\\_inside.0z@icloud.com](mailto:oboe_inside.0z@icloud.com)

**From:** [Michael Hamm](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:54:08 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Michael Hamm  
[michael.hamm@centre.edu](mailto:michael.hamm@centre.edu)

**From:** [Chris Barnett](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:52:12 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

US Methane emissions from livestock and natural gas are nearly equal.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Chris Barnett  
[cbarnett.sf@gmail.com](mailto:cbarnett.sf@gmail.com)



**From:** [Sharon Lieberman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:52:08 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Sharon Lieberman  
[sjlieby@mcn.org](mailto:sjlieby@mcn.org)

**From:** [Marilyn Flynn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:50:07 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Marilyn Flynn  
[mflynn4461@aol.com](mailto:mflynn4461@aol.com)

**From:** [Pamela Rogers](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:49:06 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term ‘clean coal’ used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Pamela Rogers  
[rogerspamela6969@yahoo.com](mailto:rogerspamela6969@yahoo.com)

**From:** [Jim Steitz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:46:11 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Kindly act in the best interest of the public good.

Sincerely,  
Jim Steitz  
[jimsteitz@mac.com](mailto:jimsteitz@mac.com)

**From:** [Robin Morton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:43:14 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Robin Morton  
[robinthedeadeadhead@hotmail.com](mailto:robinthedeadeadhead@hotmail.com)

**From:** [Valerie Hildebrand](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:40:11 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

"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."

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Valerie Hildebrand  
[vintgal009@gmail.com](mailto:vintgal009@gmail.com)

**From:** [Lynn Graham](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:35:08 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Lynn Graham  
[animalwelfare77@yahoo.com](mailto:animalwelfare77@yahoo.com)

**From:** [Dori Grasso](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:34:14 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Dori Grasso  
[dcgrasso1@yahoo.com](mailto:dcgrasso1@yahoo.com)



**From:** [Rabbi Adele Plotkin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:34:08 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Rabbi Adele Plotkin  
4adelejay@gmail.com

**From:** ["Gayle Edelman-Tolchin"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:33:08 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Gayle Edelman-Tolchin  
[mommy725@aol.com](mailto:mommy725@aol.com)

**From:** [Philip Shook](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:31:17 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

US Methane emissions from livestock and natural gas are nearly equal.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Philip Shook  
[huisbaas@yahoo.com](mailto:huisbaas@yahoo.com)

**From:** [Cindy Clark](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:31:13 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Cindy Clark  
cclark865@msn.com

**From:** [Fernando do Couto Henriques Jr](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:31:09 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Fernando do Couto Henriques Jr  
[fcouto@uol.com.br](mailto:fcouto@uol.com.br)

**From:** [Christopher Lee](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:28:18 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Christopher Lee  
[CLeeEnterprises@aol.com](mailto:CLeeEnterprises@aol.com)

**From:** [Lynne Bemer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:28:06 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Lynne Bemer  
[lgbemer@yahoo.com](mailto:lgbemer@yahoo.com)

**From:** [Nikki Nafziger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:26:10 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Nikki Nafziger  
[nikkinashmusic@gmail.com](mailto:nikkinashmusic@gmail.com)



**From:** [Nikki Nafziger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:26:06 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Nikki Nafziger  
[nikkinashmusic@gmail.com](mailto:nikkinashmusic@gmail.com)

**From:** [K Danowski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:24:08 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
K Danowski  
[silver\\_kd@yahoo.com](mailto:silver_kd@yahoo.com)

**From:** [Ginger Hipszky](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:23:19 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Ginger Hipszky  
[ghipszky@gmail.com](mailto:ghipszky@gmail.com)

**From:** [Gabriela Ponce](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:21:24 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

“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.”

The NPS’ plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS’ and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS’ plan, and find the plan not consistent.

Sincerely,  
Gabriela Ponce  
[gaa.ponce@gmail.com](mailto:gaa.ponce@gmail.com)

**From:** [Sherri Fryer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:21:16 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Sherri Fryer  
[bubblez62@comcast.net](mailto:bubblez62@comcast.net)

**From:** [Margo Friedman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:18:06 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Margo Friedman  
[margofriedman18@yahoo.com](mailto:margofriedman18@yahoo.com)

**From:** ["Patricia Blackwell-Marchant"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:14:15 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Patricia Blackwell-Marchant  
[patmarchant@comcast.net](mailto:patmarchant@comcast.net)

**From:** [Stuart Clark](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:14:10 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Stuart Clark  
s3g6c9@hotmail.com



**From:** [Carolyn Massey](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:14:08 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, “The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention.” This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Carolyn Massey  
[claudia1112003@outlook.com](mailto:claudia1112003@outlook.com)

**From:** ["Jan Pfeiffer-Rios"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:11:07 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Jan Pfeiffer-Rios  
[jpfeifferrios@gmail.com](mailto:jpfeifferrios@gmail.com)

**From:** [Kelly Allison](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:10:07 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

**From:** [Donald Garlit](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:07:08 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Donald Garlit  
[donalddgarlit@yahoo.com](mailto:donalddgarlit@yahoo.com)

**From:** [Lisa Cubeiro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:05:09 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Lisa Cubeiro  
[lisacubeiro@gmail.com](mailto:lisacubeiro@gmail.com)

**From:** [Susanna Frohman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:03:12 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Susanna Frohman  
[susanna.frohman@gmail.com](mailto:susanna.frohman@gmail.com)

**From:** [graciela ramirez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:03:08 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
graciela ramirez  
twotonetia@yahoo.com

**From:** [Andrea Wolfson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:02:12 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

“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.”

Please protect the native tule elk from being culled in our National Seashore.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Andrea Wolfson  
[andrea.wolfson@gmail.com](mailto:andrea.wolfson@gmail.com)



**From:** [Pedro Mercado](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:00:17 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Pedro Mercado  
[crickey3400@gmail.com](mailto:crickey3400@gmail.com)

**From:** [Judith Hansell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:00:16 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Judith Hansell  
[jdhrn@sbcglobal.net](mailto:jdhrn@sbcglobal.net)

**From:** [Camie Rodgers](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:00:13 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (Enterococcus is another large genus of bacteria)."

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Camie Rodgers  
[camie.rodgers@gmail.com](mailto:camie.rodgers@gmail.com)

**From:** [Claudia Johansen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:00:09 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Claudia Johansen  
[email4ccj@gmail.com](mailto:email4ccj@gmail.com)

**From:** [Lorrie Gault](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:55:11 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS’ plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS’ plan and help us save our Seashore.

Sincerely,  
Lorrie Gault  
[lkgault@cs.com](mailto:lkgault@cs.com)

**From:** [Mark Feldman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:53:10 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Cows produce 150 billion gallons of methane per day.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Mark Feldman  
[happeevegan@gmail.com](mailto:happeevegan@gmail.com)

**From:** [Carla Behrens](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:52:11 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don’t resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn’t enable natural composting, and results in water pollution.

Assuming the NPS’ strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg “The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock “does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate.” The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS’ strategy.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher’s plan.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS’ plan. The impacts of ranching in PRNS is well documented in the NPS’ own EIS - ranching must end in PRNS.

Sincerely,  
Carla Behrens

**From:** [Lisa Salazar](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:50:10 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Lisa Salazar  
[lisajunior@att.net](mailto:lisajunior@att.net)



**From:** [Janice Stanger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:47:08 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Janice Stanger  
[janicekstanger@yahoo.com](mailto:janicekstanger@yahoo.com)

**From:** [Rebecca Ruiz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:46:10 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Rebecca Ruiz  
[r.diaz.13@hotmail.com](mailto:r.diaz.13@hotmail.com)

**From:** [Sharon Balzano](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:46:09 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Sharon Balzano  
[luvpeace99@comcast.net](mailto:luvpeace99@comcast.net)

**From:** [Scott Watanabe](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:44:11 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Scott Watanabe  
[jedimasterryo89@aol.com](mailto:jedimasterryo89@aol.com)

**From:** [Rita Emami](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:44:07 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Rita Emami  
[ritaemami@gmail.com](mailto:ritaemami@gmail.com)

**From:** [Lois Dunn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:42:08 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Lois Dunn  
[dunnlois@yahoo.com](mailto:dunnlois@yahoo.com)

**From:** [Lance Kammerud](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:42:07 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Lance Kammerud  
[lance2479@gmail.com](mailto:lance2479@gmail.com)

**From:** [jean buchanan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:41:10 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO<sub>2</sub> deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO<sub>2</sub>. Most of this comes from manure.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
jean buchanan  
[jabuchanan23@yahoo.com](mailto:jabuchanan23@yahoo.com)



**From:** [Judy Wong](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:38:11 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Judy Wong  
[wongjudy57@gmail.com](mailto:wongjudy57@gmail.com)

**From:** [Kathleen Doyle](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:38:05 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Kathleen Doyle  
[caseydkcd@aol.com](mailto:caseydkcd@aol.com)

**From:** [caryl speck](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:37:07 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
caryl speck  
[caryl.speck@earthlink.net](mailto:caryl.speck@earthlink.net)

**From:** [Carl Tyndall](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:36:07 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Carl Tyndall  
Ctyn2000@yahoo.com

**From:** [Judy Fairless](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:35:07 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Judy Fairless  
8wildcat@optonline.net

**From:** [As Er](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:34:19 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS’ plan (CD-0006-02)

Sincerely,  
As Er  
[reilsshera@aol.com](mailto:reilsshera@aol.com)

**From:** [Sa Re](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:34:15 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Sa Re  
[Reilsshera@aol.com](mailto:Reilsshera@aol.com)

**From:** [Cassandra Cranmer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:34:07 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Cassandra Cranmer  
[alexislake@earthlink.net](mailto:alexislake@earthlink.net)



**From:** [James Hurley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:33:07 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
James Hurley  
[jimagination@yahoo.com](mailto:jimagination@yahoo.com)

**From:** [Mark Glasser](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:32:15 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Mark Glasser  
[mark7glasser@ca.rr.com](mailto:mark7glasser@ca.rr.com)

**From:** [Nadine James](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:32:10 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

“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.”

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

The CCC’s mission is to protect and enhance the California coast. It reads “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.”

Per the CCC’s mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Nadine James

**From:** [Lois Yuen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:31:07 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Lois Yuen  
loisy1@gmail.com

**From:** [Katrina Shortridge](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:30:09 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Please protect the native tule elk from being culled in our National Seashore.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Katrina Shortridge  
[katlogan@aol.com](mailto:katlogan@aol.com)

**From:** [Lynn Barbieri](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:29:07 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don’t even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS’ plan (CD-0006-02 ).

Sincerely,  
Lynn Barbieri  
[lbbarbieri@aol.com](mailto:lbbarbieri@aol.com)

**From:** [John Howden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:27:06 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
John Howden  
[jhowden@rogers.com](mailto:jhowden@rogers.com)

**From:** [Joyce Devlin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:26:14 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Joyce Devlin  
[joycedevlin@yahoo.com](mailto:joycedevlin@yahoo.com)



**From:** [Debra Jones](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:26:07 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Debra Jones  
[dljbeach@gmail.com](mailto:dljbeach@gmail.com)

**From:** [Ann Sheffield](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:25:15 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Ann Sheffield  
[annsheffield@gmail.com](mailto:annsheffield@gmail.com)

**From:** [Steve Wanninger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:23:18 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Steve Wanninger  
[smwanninger@comcast.net](mailto:smwanninger@comcast.net)

**From:** [Charlene Johnson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:23:13 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Charlene Johnson  
[cramscaj@gmail.com](mailto:cramscaj@gmail.com)

**From:** [Susan Jordan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:23:11 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Susan Jordan  
[honeygirl2361@gmail.com](mailto:honeygirl2361@gmail.com)

**From:** [Carol Jagiello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:23:05 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS’ plan (CD-0006-02)

Sincerely,  
Carol Jagiello  
[cjags91@optonline.net](mailto:cjags91@optonline.net)

**From:** [Wendy Weldon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:21:13 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Wendy Weldon  
[wendylweldon@yahoo.com](mailto:wendylweldon@yahoo.com)

**From:** [Diane Verna](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:21:07 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,



**From:** [Debbie Goodwin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:17:16 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Debbie Goodwin  
[weberdeber@yahoo.com](mailto:weberdeber@yahoo.com)

**From:** [Ilse Spiegel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:17:09 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public’s vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don’t miss this opportunity. Do what’s right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Ilse Spiegel  
[schoenbrunn85@gmail.com](mailto:schoenbrunn85@gmail.com)

**From:** [Suzanne Kunstman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:17:06 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Suzanne Kunstman  
[tuti\\_on\\_ice@yahoo.com](mailto:tuti_on_ice@yahoo.com)

**From:** [Jean Dibble](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:15:10 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don’t resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn’t enable natural composting, and results in water pollution.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn’t just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn’t remove the cows from Pt. Reyes.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Jean Dibble

**From:** [Cheryl Dzubak](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:14:17 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

It is of great concern politicians at the local and federal level support the NPS’s actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

**From:** [Elizabeth Pacanovsky](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:13:08 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Please withdraw your conditional approval of the NPS’ plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Elizabeth Pacanovsky  
[beth.pacanovsky@gmail.com](mailto:beth.pacanovsky@gmail.com)

**From:** [Orysia Twerdochlib](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:11:07 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Orysia Twerdochlib  
[orysiat@yahoo.com](mailto:orysiat@yahoo.com)

**From:** [Kacey Donston](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:09:17 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Kacey Donston  
[lvtrees@gmail.com](mailto:lvtrees@gmail.com)



**From:** [alexander vollmer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:09:15 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
alexander vollmer  
abv5@cornell.edu

**From:** [Kim Sellon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:09:10 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Kim Sellon  
[kimsellon@gmail.com](mailto:kimsellon@gmail.com)

**From:** [Toni Adisano](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:09:08 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Toni Adisano  
[Tweeti1952@aol.com](mailto:Tweeti1952@aol.com)

**From:** [Mark Henry](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:08:11 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Cows produce 150 billion gallons of methane per day.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Mark Henry  
[anacristinajacques@yahoo.com](mailto:anacristinajacques@yahoo.com)

**From:** [Mil Apostol](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:08:06 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are "technically or financially infeasible" and "in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS"

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Mil Apostol  
[milapostol1@gmail.com](mailto:milapostol1@gmail.com)

**From:** [LuAnne Swainson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:06:17 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Cows produce 150 billion gallons of methane per day.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
LuAnne Swainson  
[mswainson@att.net](mailto:mswainson@att.net)

**From:** [Jessica Fielden MD](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:05:18 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Jessica Fielden MD  
[jesigata@yahoo.com](mailto:jesigata@yahoo.com)

**From:** [Julia N Allen PhD DVM](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:05:09 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Julia N Allen PhD DVM  
[DrJNA@comcast.net](mailto:DrJNA@comcast.net)



**From:** [Karen Toyohara](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:04:07 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Karen Toyohara  
[spboersma@gmail.com](mailto:spboersma@gmail.com)

**From:** [Amy Proctor](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:03:13 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Amy Proctor  
[gunnwitch1@gmail.com](mailto:gunnwitch1@gmail.com)

**From:** [kim froehlich](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:03:09 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

Beef and dairy operations are well known to be leading causes of climate change, so they don’t belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of “regenerative grazing” (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8’ fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS’ plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS’ plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
kim froehlich  
[kimfroehlich4218@yahoo.com](mailto:kimfroehlich4218@yahoo.com)

**From:** [Erica Munn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:02:06 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS’ plan

Sincerely,  
Erica Munn

**From:** [Ben Gillum](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:00:12 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Ben Gillum  
[bgillum86@yahoo.com](mailto:bgillum86@yahoo.com)

**From:** [Christy Carico](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:59:18 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Christy Carico  
[carico.christine@gmail.com](mailto:carico.christine@gmail.com)

**From:** [Annabelle Herbert](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:58:10 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Annabelle Herbert  
[annabelleh13@gmail.com](mailto:annabelleh13@gmail.com)

**From:** [Debra Teplin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:57:09 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, “The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention.” This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Debra Teplin  
[alpine700@aol.com](mailto:alpine700@aol.com)



**From:** [Joan Hansen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:56:14 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Joan Hansen  
[jhansen9667@gmail.com](mailto:jhansen9667@gmail.com)

**From:** [Liz Field](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:48:16 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Liz Field  
[ejefield16@comcast.net](mailto:ejefield16@comcast.net)

**From:** [Mary Shabbott](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:48:14 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Please protect the native tule elk from being culled in our National Seashore.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Mary Shabbott  
[mshabbott@sbcglobal.net](mailto:mshabbott@sbcglobal.net)

**From:** [Norma Jeffery](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:47:13 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

The CCC should not approve of a Climate Action Strategy from the NPS that can’t prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public’s vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don’t miss this opportunity. Do what’s right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Norma Jeffery  
[boboobrown@mac.com](mailto:boboobrown@mac.com)

**From:** [Tamara Cain](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:46:14 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Tamara Cain  
[fourdogs1950@hotmail.com](mailto:fourdogs1950@hotmail.com)

**From:** [Anthony Wong](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:46:11 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

"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."

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Anthony Wong  
twong502@gmail.com

**From:** [Cliff DeVries](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:46:08 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Cliff DeVries  
[cliffdev@hotmail.com](mailto:cliffdev@hotmail.com)

**From:** [Elena Tillman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:42:13 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

The NPS’ plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Elena Tillman  
[tillman.elena@gmail.com](mailto:tillman.elena@gmail.com)



**From:** [Kris Strate](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:42:09 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Kris Strate

**From:** [Colleen Lobel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:42:05 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Colleen Lobel  
[clobell@san.rr.com](mailto:clobell@san.rr.com)

**From:** [Kathleen Dachuk](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:38:10 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Kathleen Dachuk  
[ratz2katz@yahoo.ca](mailto:ratz2katz@yahoo.ca)

**From:** [jacqueline tessman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:38:09 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

**From:** [Gregory Esteve](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:37:15 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Beef and dairy operations are well known to be leading causes of climate change, so they don’t belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of “regenerative grazing” (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Gregory Esteve  
[gvesteve@gmail.com](mailto:gvesteve@gmail.com)

**From:** [Lori Kegler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:37:10 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a ‘management threshold.’ Please note there is no science behind the NPS’ number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS’ plan (CD-0006-02 ).

**From:** [Gregory Esteve](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:37:09 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Gregory Esteve  
[gvesteve@gmail.com](mailto:gvesteve@gmail.com)

**From:** [Doreen Tignanelli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:36:24 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Doreen Tignanelli  
[doreentig@aol.com](mailto:doreentig@aol.com)



**From:** [Charles Alexander](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:36:16 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significantly polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8’ fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS’ plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS’ plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS’ plan.

Sincerely,  
Charles Alexander  
[ch\\_a\\_alex@hotmail.com](mailto:ch_a_alex@hotmail.com)

**From:** ["Beverly Williamson-Pecori"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:36:13 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Beverly Williamson-Pecori  
bwp97@verizon.net

**From:** [Maggie Kauffman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:36:10 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Maggie Kauffman  
[mial773@yahoo.vom](mailto:mial773@yahoo.vom)

**From:** [Vicky Brandt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:35:11 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Vicky Brandt  
[brandtv@mac.com](mailto:brandtv@mac.com)

**From:** [Mindy Pfeiffer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:34:08 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Mindy Pfeiffer  
[mindypfeiffer@sbcglobal.net](mailto:mindypfeiffer@sbcglobal.net)

**From:** [Bruce Sowden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:31:08 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Bruce Sowden  
[bruce\\_sowden@yahoo.com](mailto:bruce_sowden@yahoo.com)

**From:** [Stephen Haney](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:29:11 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Stephen Haney  
[stephenhaney@comcast.net](mailto:stephenhaney@comcast.net)

**From:** [Joseph M Varon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:29:07 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Joseph M Varon  
[jvaron613@aol.com](mailto:jvaron613@aol.com)



**From:** [Karen Dabrusin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:27:13 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Karen Dabrusin  
[kdabrusin@aim.com](mailto:kdabrusin@aim.com)

**From:** [Sylvia Ruiz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:27:08 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Kindly act in the best interest of the public good.

Sincerely,  
Sylvia Ruiz  
[sylvia@tierraconceptsinc.com](mailto:sylvia@tierraconceptsinc.com)

**From:** [Allisyn Snyder](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:26:09 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Allisyn Snyder  
[allisynsnyder@gmail.com](mailto:allisynsnyder@gmail.com)

**From:** [Tiffany Grant](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:24:14 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Tiffany Grant  
TifGrant@aol.com

**From:** [Rosemary Pasquarello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:23:15 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Rosemary Pasquarello  
[hirosie88@gmail.com](mailto:hirosie88@gmail.com)

**From:** [Sasha Hjerpe](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:23:09 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Sasha Hjerpe  
[sashahjerpe@att.net](mailto:sashahjerpe@att.net)

**From:** [Paige Humphreys](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:23:07 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Paige Humphreys  
[paigehurley73@hotmail.com](mailto:paigehurley73@hotmail.com)

**From:** [Carolyn Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:22:15 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.



**From:** [Cheryl Trosper](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:22:05 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Cheryl Trosper  
[cherylt4235@gmail.com](mailto:cherylt4235@gmail.com)

**From:** [valerie clark](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:20:23 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
valerie clark  
[vclark1947@gmail.com](mailto:vclark1947@gmail.com)

**From:** [Nick Flaig](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:20:16 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Nick Flaig  
[nflaig@scu.edu](mailto:nflaig@scu.edu)

**From:** [Deb CASTELLANA](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:20:14 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Dairy farms and cattle ranching don’t belong in a national park. They contribute to climate change. Don’t be fooled by false “greenwashing” claims, about “regenerative grazing” or “carbon farming.” Those concepts are promoted by big money interests, but their overly optimistic claims aren’t published in referenced journals.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, “The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention.” This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Deb CASTELLANA  
[deb.castellana@gmail.com](mailto:deb.castellana@gmail.com)

**From:** [Christina Frutiger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:20:08 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Christina Frutiger  
[christinalfrutiger@comcast.net](mailto:christinalfrutiger@comcast.net)

**From:** [Mary Keithler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:19:05 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

Per the NPS’ own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

The impacts of ranching in PRNS is well documented in the NPS’ own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Mary Keithler  
[mkeithler@yahoo.com](mailto:mkeithler@yahoo.com)

**From:** [Joan Gingeresky](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:17:06 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Joan Gingeresky  
[joangingeresky@gmail.com](mailto:joangingeresky@gmail.com)

**From:** [Meredith Needham](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:17:06 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Meredith Needham  
[pianohag@hotmail.com](mailto:pianohag@hotmail.com)



**From:** [Dennis Morley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:16:09 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Dennis Morley

**From:** [Sherry Monie](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:16:07 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Sherry Monie  
sherry.monie@gmail.com

**From:** [Gordon Beebe](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:15:08 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Gordon Beebe  
[gordbb@gmail.com](mailto:gordbb@gmail.com)

**From:** [anne.veraldi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:15:07 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
anne.veraldi  
[anneveraldi@hotmail.com](mailto:anneveraldi@hotmail.com)

**From:** [Ann Jackson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:14:07 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Please protect the native tule elk from being culled in our National Seashore.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Ann Jackson  
[annja7007@yahoo.com](mailto:annja7007@yahoo.com)

**From:** [Michelle Ramauro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:11:15 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Michelle Ramauro  
[mnramauro@gmail.com](mailto:mnramauro@gmail.com)

**From:** [Richelle Kogan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:11:12 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Richelle Kogan  
[kodolphin@yahoo.com](mailto:kodolphin@yahoo.com)



**From:** [Tim Ryan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:11:10 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

I urge the Commission to not support the NPS’ plan to cull native Tule elk in PRNS.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Tim Ryan  
[janemarie19@gmail.com](mailto:janemarie19@gmail.com)

**From:** [saRah Wyckoff](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:10:11 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
saRah Wyckoff  
[sarahwendeline@yahoo.com](mailto:sarahwendeline@yahoo.com)

**From:** [Michele Dawn Sanderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:10:07 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

“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.”

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Michele Dawn Sanderson  
vega7dawn@hotmail.com

**From:** [Selina Stratton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:09:17 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

“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.”

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne’s disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Selina Stratton  
[selinabean85@yahoo.com](mailto:selinabean85@yahoo.com)

**From:** [Crys Carithers](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:09:12 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Crys Carithers  
[Cmcbartender@yahoo.com](mailto:Cmcbartender@yahoo.com)

**From:** [Tracy Nguyen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:09:06 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Tracy Nguyen  
[tracytn@gmail.com](mailto:tracytn@gmail.com)

**From:** [Oliver Guichard](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:07:09 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Oliver Guichard  
[lys\\_knight@yahoo.com](mailto:lys_knight@yahoo.com)

**From:** [Thomas Boughan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:06:08 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Thomas Boughan



**From:** [Toni Wolfson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:06:06 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne’s disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let’s restore our National Seashore

Sincerely,  
Toni Wolfson  
[hummingdeer@yahoo.com](mailto:hummingdeer@yahoo.com)

**From:** [Kay Arthur](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:05:11 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

California’s highest E.Coli level was recorded on a Point Reyes ranch. Park service’s 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Kay Arthur  
[kayarthurlfc@icloud.com](mailto:kayarthurlfc@icloud.com)

**From:** [Rob Kornet](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:04:14 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Rob Kornet  
[dkornet@yahoo.com](mailto:dkornet@yahoo.com)

**From:** [Robert E Goodman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:04:09 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Robert E Goodman  
[bonairena@yahoo.com](mailto:bonairena@yahoo.com)

**From:** [Nuri Pierce](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:03:10 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Please protect the native tule elk from being culled in our National Seashore.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Nuri Pierce  
[nuribpierce@gmail.com](mailto:nuribpierce@gmail.com)

**From:** [Jennifer Gitschier](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:03:07 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Jennifer Gitschier  
[jgitch@aol.com](mailto:jgitch@aol.com)

**From:** [Christina Winter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:02:09 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Christina Winter  
[christylrden1963@gmail.com](mailto:christylrden1963@gmail.com)

**From:** [Melinda Lewis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:02:07 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

US Methane emissions from livestock and natural gas are nearly equal.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Melinda Lewis  
[melindaabq@yahoo.com](mailto:melindaabq@yahoo.com)



**From:** [Melinda Lewis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:00:11 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Melinda Lewis  
[melindaabq@yahoo.com](mailto:melindaabq@yahoo.com)

**From:** [Jennifer Martini](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:00:08 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Jennifer Martini  
[jmartini1994@yahoo.com](mailto:jmartini1994@yahoo.com)

**From:** [Ron Silver](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:59:11 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

US Methane emissions from livestock and natural gas are nearly equal.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Ron Silver  
[rhinopias@comcast.net](mailto:rhinopias@comcast.net)

**From:** [Margaret Silver](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:59:08 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Margaret Silver  
[cattleya@comcast.net](mailto:cattleya@comcast.net)

**From:** [Jeri Altman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:58:09 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

“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.”

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a ‘management threshold.’ Please note there is no science behind the NPS’ number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS’ plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS’ plan.

Sincerely,  
Jeri Altman  
[jaderabbit1@msn.com](mailto:jaderabbit1@msn.com)

**From:** [Kristin Hodge](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:56:08 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Kristin Hodge  
[krisbackstage@aol.com](mailto:krisbackstage@aol.com)

**From:** [Annerose Albus](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:56:06 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

US Methane emissions from livestock and natural gas are nearly equal.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Annerose Albus  
[annealbus@gmail.com](mailto:annealbus@gmail.com)

**From:** [Jackie Tryggeseth](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:55:11 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Jackie Tryggeseth  
[jtrygges@hotmail.com](mailto:jtrygges@hotmail.com)



**From:** [Kathi A Ridgway](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:55:07 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Kathi A Ridgway  
[ridgkathi43213@msn.com](mailto:ridgkathi43213@msn.com)

**From:** [Blaise Brockman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:54:10 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnne's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

**From:** [Grace Holden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:53:06 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Grace Holden  
[gmh829@gmail.com](mailto:gmh829@gmail.com)

**From:** [Valerie Sisson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:52:05 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Valerie Sisson  
vlrie69@gmail.com

**From:** [Samantha Goodman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:51:10 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Samantha Goodman  
[samanthag@aol.com](mailto:samanthag@aol.com)

**From:** [les roberts](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:47:08 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Cows produce 150 billion gallons of methane per day.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
les roberts  
hobo17pollie@gmail.com

**From:** [Jim Head](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:45:18 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Jim Head  
[jimheadjr@hotmail.com](mailto:jimheadjr@hotmail.com)

**From:** [Robert Ortiz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:45:15 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Robert Ortiz  
[r77ortiz@hotmail.com](mailto:r77ortiz@hotmail.com)



**From:** [Wallace Rhine](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:45:11 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Wallace Rhine  
fafner@bftb.net

**From:** [Marcey Lachance](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:44:07 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Marcey Lachance  
[mlachance@gmmsda.org](mailto:mlachance@gmmsda.org)

**From:** [Jon Hager](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:43:07 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significantly polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Jon Hager  
[stormcrow60@xmission.com](mailto:stormcrow60@xmission.com)

**From:** [Nathalie Quesnel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:42:16 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Nathalie Quesnel  
[na.quesnel@laposte.net](mailto:na.quesnel@laposte.net)

**From:** [Marina Mooney](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:42:12 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Marina Mooney  
[moonking.charity@gmail.com](mailto:moonking.charity@gmail.com)

**From:** [Ellen Lewis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:42:08 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS’ and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS’ plan, and find the plan not consistent.

Sincerely,  
Ellen Lewis  
[eggbert26@yahoo.com](mailto:eggbert26@yahoo.com)

**From:** [Susan Yarnell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:41:09 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Kindly act in the best interest of the public good.

Sincerely,  
Susan Yarnell  
[syarnell@earthlink.net](mailto:syarnell@earthlink.net)

**From:** [midori furutate](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:40:10 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
midori furutate  
[blueingreen000@gmail.com](mailto:blueingreen000@gmail.com)



**From:** [Rolf Friis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:40:07 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Rolf Friis  
[rristrue4u@yahoo.com](mailto:rristrue4u@yahoo.com)

**From:** [Debz Jones](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:39:11 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Debz Jones

**From:** [Perry Gx](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:39:10 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Perry Gx  
[perrygxx@gmail.com](mailto:perrygxx@gmail.com)

**From:** [Paul Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:39:08 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Paul Anderson  
[apaulled@yahoo.com](mailto:apaulled@yahoo.com)

**From:** [Francia Jaramillo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:38:21 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Francia Jaramillo  
[francia23milena@hotmail.com](mailto:francia23milena@hotmail.com)

**From:** [Sandra Sobanski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:38:15 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Sandra Sobanski  
[dragonsandy1@yahoo.com](mailto:dragonsandy1@yahoo.com)

**From:** [Janet Neihart](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:38:15 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Janet Neihart  
[janeihart66@aol.com](mailto:janeihart66@aol.com)

**From:** [Jorge De Cecco](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:38:07 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Jorge De Cecco  
[bndass@yahoo.com](mailto:bndass@yahoo.com)



**From:** [Jerily Rushworth](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:38:06 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Jerily Rushworth  
[sinamon\\_spider13@yahoo.com](mailto:sinamon_spider13@yahoo.com)

**From:** [Myphon Hunt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:37:14 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Myphon Hunt  
[myphon1@gmail.com](mailto:myphon1@gmail.com)

**From:** [Jeremy Lynch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:37:09 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Jeremy Lynch  
jpl92077@comcast.net

**From:** [Felicia Lewis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:37:05 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Felicia Lewis  
[felicialewis1@hotmail.com](mailto:felicialewis1@hotmail.com)

**From:** [Sharon Ketcherside](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:36:18 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Sharon Ketcherside  
[ketch07@hotmail.com](mailto:ketch07@hotmail.com)

**From:** [Anthony Patti](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:36:18 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Anthony Patti  
[lovelllaker@verizon.net](mailto:lovelllaker@verizon.net)

**From:** [Paul LeBlanc](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:36:13 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS’ plan.

Sincerely,  
Paul LeBlanc  
[gumbonchef@gmail.com](mailto:gumbonchef@gmail.com)

**From:** [Sherrell Cuneo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:36:11 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Sherrell Cuneo  
[sherrellcuneo@yahoo.com](mailto:sherrellcuneo@yahoo.com)



**From:** [Josephine Cristobal](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:35:23 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Josephine Cristobal  
[jbcristo@hawaii.edu](mailto:jbcristo@hawaii.edu)

**From:** [Jennifer Martini](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:35:22 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Jennifer Martini  
[jmartini1994@yahoo.com](mailto:jmartini1994@yahoo.com)

**From:** [susanne madden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:35:07 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
susanne madden  
[madrsrc@aol.com](mailto:madrsrc@aol.com)

**From:** [Kim White](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:32:08 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Kindly act in the best interest of the public good.

Sincerely,  
Kim White  
[kimw@pixar.com](mailto:kimw@pixar.com)

**From:** ["Polly O'Malley"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:32:06 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Polly O'Malley  
[loislow@earthlink.net](mailto:loislow@earthlink.net)

**From:** [Jayne Cerny](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:31:09 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Jayne Cerny  
[jaynecerny@gmail.com](mailto:jaynecerny@gmail.com)

**From:** [John Tetel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:30:15 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Cows produce 150 billion gallons of methane per day.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
John Tetel  
[gerardtettel@gmail.com](mailto:gerardtettel@gmail.com)

**From:** [Craig Ballweg](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:30:12 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Craig Ballweg  
cballweg59@msn.com



**From:** [Carrie West](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:30:11 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Carrie West  
cewest67@gmail.com

**From:** [Nicola Nicolai](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:30:08 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Nicola Nicolai  
[nicola.6@comcast.net](mailto:nicola.6@comcast.net)

**From:** [Karen Martellaro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:28:14 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Karen Martellaro  
[kar4earth@gmail.com](mailto:kar4earth@gmail.com)

**From:** [Lisa Wojcik](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:28:10 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne’s disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Lisa Wojcik  
[lisadaniellewojcik@gmail.com](mailto:lisadaniellewojcik@gmail.com)

**From:** [Jill Nicholas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:28:08 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Jill Nicholas  
[jlnicholas@rochester.rr.com](mailto:jlnicholas@rochester.rr.com)

**From:** [Paulette Allison](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:28:08 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Paulette Allison  
[paulette728@gmail.com](mailto:paulette728@gmail.com)

**From:** [Ken Kurtz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:27:13 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Ken Kurtz  
kkurtz123@gmail.com

**From:** [Walter Ramsey](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:27:12 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Please protect the native tule elk from being culled in our National Seashore.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Walter Ramsey  
[walter.ramsey@sbcglobal.net](mailto:walter.ramsey@sbcglobal.net)



**From:** [Joan Smith](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:27:05 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Please withdraw your conditional approval of the NPS’ plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Joan Smith  
[joanesq93@gmail.com](mailto:joanesq93@gmail.com)

**From:** [Tammy Saied](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:26:17 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Kindly act in the best interest of the public good.

Sincerely,  
Tammy Saied  
[tammyds@citlink.net](mailto:tammyds@citlink.net)

**From:** [Kristyn MacPhail](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:26:09 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Kristyn MacPhail  
[kristyn377@yahoo.com](mailto:kristyn377@yahoo.com)

**From:** ["Betsy cousins-coleman"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:26:07 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Betsy cousins-coleman

**From:** [Sloane Morgan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:26:07 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Sloane Morgan  
[sloanemorgan@gmail.com](mailto:sloanemorgan@gmail.com)

**From:** [Tracy Reiman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:24:14 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

**From:** [Marina Barry](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:24:12 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Marina Barry  
[marinab5005@gmail.com](mailto:marinab5005@gmail.com)

**From:** ["Rich & Eileen Heaning"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:24:08 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

US Methane emissions from livestock and natural gas are nearly equal.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Rich & Eileen Heaning  
[bumper8220@aol.com](mailto:bumper8220@aol.com)



**From:** [Marina Barry](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:24:06 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Marina Barry  
[marinab5005@gmail.com](mailto:marinab5005@gmail.com)

**From:** ["Beatrix Wassermann-Otto"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:23:14 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Please protect the native tule elk from being culled in our National Seashore.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Beatrix Wassermann-Otto  
[beatrice.wassermann@gmail.com](mailto:beatrice.wassermann@gmail.com)

**From:** [Reginesanspub SCHNEIDERSANSPUB](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:23:12 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn’t just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn’t remove the cows from Pt. Reyes.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Reginesanspub SCHNEIDERSANSPUB  
[Flora69@gmail.com](mailto:Flora69@gmail.com)

**From:** [ellen holmes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:23:09 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like “Clean Coal.”

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a ‘management threshold.’ Please note there is no science behind the NPS’ number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
ellen holmes  
[ellenmusic@me.com](mailto:ellenmusic@me.com)

**From:** [Jamie Reifman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:23:09 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Jamie Reifman  
[jl2416@sbcglobal.net](mailto:jl2416@sbcglobal.net)

**From:** [Stephanie Stone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:21:19 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Stephanie Stone  
[istepstone@aol.com](mailto:istepstone@aol.com)

**From:** [Gwenn Schemer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:21:19 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Gwenn Schemer  
[gbs15@aol.com](mailto:gbs15@aol.com)

**From:** [Mary Moderacki](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:21:16 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Mary Moderacki  
[dmoderacki17@gmail.com](mailto:dmoderacki17@gmail.com)



**From:** [Debbie Kearns](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:21:13 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Debbie Kearns  
[angeldeb82@comcast.net](mailto:angeldeb82@comcast.net)

**From:** [Kirsten Lear](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:21:10 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Kirsten Lear  
[learkirsten@gmail.com](mailto:learkirsten@gmail.com)

**From:** [Tina Durakov](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:21:08 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Tina Durakov  
[tgruver74@gmail.com](mailto:tgruver74@gmail.com)

**From:** [Alli H](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:20:22 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

"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."

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Alli H  
[allisonphaney@gmail.com](mailto:allisonphaney@gmail.com)

**From:** [Amy Hopkins](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:20:19 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Amy Hopkins  
[hopkinsus@cs.com](mailto:hopkinsus@cs.com)

**From:** [Karen Goetze](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:20:17 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Please protect the native tule elk from being culled in our National Seashore.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Karen Goetze  
[theouterbankstraveler@yahoo.com](mailto:theouterbankstraveler@yahoo.com)

**From:** [Diane Fields](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:20:08 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Diane Fields  
[aliasmadonna@hotmail.com](mailto:aliasmadonna@hotmail.com)

**From:** [m alker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:19:08 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
m alker  
[kanako@pacific.net](mailto:kanako@pacific.net)



**From:** [Edith Ogella](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:18:07 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Edith Ogella  
[edithogella@msn.com](mailto:edithogella@msn.com)

**From:** [Carole Smudiin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:18:06 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Carole Smudiin  
[luvs2compost@comcast.net](mailto:luvs2compost@comcast.net)

**From:** [Susan Lantow](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:17:10 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Susan Lantow  
[lantow1@comcast.net](mailto:lantow1@comcast.net)

**From:** [Donald Taylor](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:16:15 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

The NPS’ plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Donald Taylor  
[cplii@sbcglobal.net](mailto:cplii@sbcglobal.net)

**From:** [Elaine Benjamin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:16:13 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Elaine Benjamin  
[ebalpine@flash.net](mailto:ebalpine@flash.net)

**From:** [Nina Aronoff](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:15:10 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Nina Aronoff  
[nlaronoff@gmail.com](mailto:nlaronoff@gmail.com)

**From:** [Billie Jo Tees](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:14:14 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Billie Jo Tees  
[bjtees@aol.com](mailto:bjtees@aol.com)

**From:** [Lisa Mazzola](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:14:13 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Lisa Mazzola  
[lmazzola@tampabay.rr.com](mailto:lmazzola@tampabay.rr.com)



**From:** [Pamela Evans](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:14:09 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Pamela Evans  
[gardenqueen@gmail.com](mailto:gardenqueen@gmail.com)

**From:** [Albert Fecko](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:13:18 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Albert Fecko  
[slovakya@aol.com](mailto:slovakya@aol.com)

**From:** [Susan Goldberg](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:13:15 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Susan Goldberg

**From:** [Kim Feters](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:13:13 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Kim Feters  
[kimfeters@verizon.net](mailto:kimfeters@verizon.net)

**From:** [Jim Loveland](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:13:08 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Please protect the native tule elk from being culled in our National Seashore.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS’ plan.

Sincerely,  
Jim Loveland  
[jimloveland52@yahoo.com](mailto:jimloveland52@yahoo.com)

**From:** [John Hagen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:12:08 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Dairy farms and cattle ranching don’t belong in a national park. They contribute to climate change. Don’t be fooled by false “greenwashing” claims, about “regenerative grazing” or “carbon farming.” Those concepts are promoted by big money interests, but their overly optimistic claims aren’t published in referenced journals.

Please protect the native tule elk from being culled in our National Seashore.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
John Hagen  
[umfb77@yahoo.com](mailto:umfb77@yahoo.com)

**From:** [Ralph Haney](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:11:25 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a ‘management threshold.’ Please note there is no science behind the NPS’ number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS’ plan

Sincerely,  
Ralph Haney  
rth777@comcast.net

**From:** [Thomas Lincoln](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:11:19 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Thomas Lincoln  
TLinc02155@AOL.com



**From:** [Johanna van de Woestijne](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:11:15 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Johanna van de Woestijne  
[johannacalifornia@gmail.com](mailto:johannacalifornia@gmail.com)

**From:** [Patricia DeLuca](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:11:10 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Patricia DeLuca  
[rickscustompainting@comcast.net](mailto:rickscustompainting@comcast.net)

**From:** [Stephanie Jones](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:11:07 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Stephanie Jones  
[therealstephjones@gmail.com](mailto:therealstephjones@gmail.com)

**From:** [Rose Riker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:10:12 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Rose Riker  
RMarie1951@msn.com

**From:** [Adrienne Metter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:10:09 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Adrienne Metter  
[adriennekligman@verizon.net](mailto:adriennekligman@verizon.net)

**From:** [Diane Kent](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:09:13 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Per the NPS’ own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Diane Kent  
[jdkent@aol.com](mailto:jdkent@aol.com)

**From:** [Olga Abella](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:09:11 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Olga Abella  
[olgafox@hotmail.com](mailto:olgafox@hotmail.com)

**From:** [Anita Wisch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:09:07 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Anita Wisch  
[nitababe44@aol.com](mailto:nitababe44@aol.com)



**From:** [JoAnne Metzler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:08:25 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
JoAnne Metzler  
[joanne.metzler@gmail.com](mailto:joanne.metzler@gmail.com)

**From:** [James Halbert](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:08:20 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
James Halbert  
[socahike@att.net](mailto:socahike@att.net)

**From:** [Robin Vincent](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:08:06 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Robin Vincent  
[badevilkittys@yahoo.com](mailto:badevilkittys@yahoo.com)

**From:** [Steve Green](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:07:10 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Cows produce 150 billion gallons of methane per day.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Steve Green  
[malogatos@yahoo.com](mailto:malogatos@yahoo.com)

**From:** [Kathy Moraski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:07:07 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the

ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Kathy Moraski  
kmoraski45@gmail.com

**From:** [William Goell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:06:07 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
William Goell  
wmgoell@aol.com

**From:** [ruth Terrill](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:05:13 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
ruth Terrill  
[rtjt@toast.net](mailto:rtjt@toast.net)



**From:** [margaret Patti](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:05:10 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
margaret Patti  
[lovelllaker@verizon.net](mailto:lovelllaker@verizon.net)

**From:** [Matthew Braun](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:05:06 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Matthew Braun  
[MatthewB@peta.org](mailto:MatthewB@peta.org)

**From:** [Marilyn Logan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:04:16 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Marilyn Logan  
[mklogan19@aol.com](mailto:mklogan19@aol.com)

**From:** ["Christine Villabona-Kuntz"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:04:15 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Christine Villabona-Kuntz  
[puretrixie@gmail.com](mailto:puretrixie@gmail.com)

**From:** ["Bonnie Faith-Smith"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:04:07 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a ‘management threshold.’ Please note there is no science behind the NPS’ number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Bonnie Faith-Smith  
whiteowl1@comcast.net

**From:** [Michelle McKenney](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:04:06 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Michelle McKenney  
[zabilla@myfairpoint.net](mailto:zabilla@myfairpoint.net)

**From:** [Craig Todd](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:03:15 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Craig Todd  
[ctodd013106@hotmail.com](mailto:ctodd013106@hotmail.com)

**From:** [Pavel Tumik](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:03:10 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Pavel Tumik  
[pavel.tumik@gmail.com](mailto:pavel.tumik@gmail.com)



**From:** [James Duff](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:03:09 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on "best management practices", but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [Cynthia Liss](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:01:19 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Cynthia Liss  
[cynliss88@yahoo.com](mailto:cynliss88@yahoo.com)

**From:** [Lois Jordan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:01:09 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Lois Jordan  
[lmjor@aol.com](mailto:lmjor@aol.com)

**From:** [Barbara Root](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:00:12 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Barbara Root  
[jambamom@gmail.com](mailto:jambamom@gmail.com)

**From:** [Henry Sanchez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 3:00:09 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Henry Sanchez  
[chevypickup55@hotmail.com](mailto:chevypickup55@hotmail.com)

**From:** [Nancy Crider](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:59:18 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Nancy Crider  
[naninwood@gmail.com](mailto:naninwood@gmail.com)

**From:** [Andrea Vega](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:59:16 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Andrea Vega  
[vega.andrea.a@gmail.com](mailto:vega.andrea.a@gmail.com)

**From:** [Barbara Blackwood](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:59:05 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Barbara Blackwood  
[barbara.bb@comcast.net](mailto:barbara.bb@comcast.net)



**From:** [SHIRLEY IRWIN](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:42 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
SHIRLEY IRWIN  
[bonny\\_shirley@btinternet.com](mailto:bonny_shirley@btinternet.com)

**From:** [Sandra Zaninovich](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:39 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Sandra Zaninovich  
[sandraoopie@yahoo.com](mailto:sandraoopie@yahoo.com)

**From:** [Beverly Simone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:35 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Beverly Simone  
[beverly.simone@verizon.net](mailto:beverly.simone@verizon.net)

**From:** [Guadalupe Killion](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:35 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Guadalupe Killion  
[lupe.xochitl@gmail.com](mailto:lupe.xochitl@gmail.com)

**From:** [jenne sindoni](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:29 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
jenne sindoni  
[jennesin911@hotmail.com](mailto:jennesin911@hotmail.com)

**From:** [Pati Jio](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:28 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Pati Jio  
[aunt\\_toni@yahoo.com](mailto:aunt_toni@yahoo.com)

**From:** [Tatjana Walker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:23 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Tatjana Walker  
[tatjana@wordwright.com](mailto:tatjana@wordwright.com)

**From:** [Sabrina Comisso](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:20 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-



seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Sabrina Commisso  
sabrinasandcomm@gmail.com

**From:** [Anne Mazzone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:17 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Anne Mazzone  
[annemaz1971@yahoo.com](mailto:annemaz1971@yahoo.com)

**From:** [Cassie Fletcher](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:14 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Kindly act in the best interest of the public good.

Sincerely,  
Cassie Fletcher  
[cassiefletcher100@gmail.com](mailto:cassiefletcher100@gmail.com)

**From:** [Mike Rolbeck](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:11 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Mike Rolbeck  
[mrolbeck@aol.com](mailto:mrolbeck@aol.com)

**From:** [Anne Mazzone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:58:06 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Anne Mazzone  
[annemaz1971@yahoo.com](mailto:annemaz1971@yahoo.com)

**From:** [Jan Leath](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:57:05 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Jan Leath  
[ranjon2@sbcglobal.net](mailto:ranjon2@sbcglobal.net)

**From:** [Catherine McGroarty](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:56:33 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Catherine McGroarty  
[luxcat5@yahoo.com](mailto:luxcat5@yahoo.com)

**From:** [Anita M Endeman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:56:31 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Anita M Endeman  
[amendemanwk@gmail.com](mailto:amendemanwk@gmail.com)



**From:** [Sandra Woodall](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:56:29 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Sandra Woodall  
[lswoodall@gmail.com](mailto:lswoodall@gmail.com)

**From:** [Kathleen Medina](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:56:25 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Kathleen Medina  
[k\\_medina@hotmail.com](mailto:k_medina@hotmail.com)

**From:** [Pati Jio](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:56:21 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Cows produce 150 billion gallons of methane per day.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Pati Jio  
[randp123@yahoo.com](mailto:randp123@yahoo.com)

**From:** [Carol Patton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:56:15 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Carol Patton  
[carol.patton@comcast.net](mailto:carol.patton@comcast.net)

**From:** [Fred Coppotelli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:56:10 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Fred Coppotelli  
[coppotelli@earthlink.net](mailto:coppotelli@earthlink.net)

**From:** [Heide Coppotelli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:56:09 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Heide Coppotelli  
[goodshepherd@comporium.net](mailto:goodshepherd@comporium.net)

**From:** [Debora Sayre](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:56:07 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Debora Sayre  
[sayredk@msn.com](mailto:sayredk@msn.com)

**From:** [Lucy Collier](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:55:16 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Lucy Collier  
[ljcollier2003@yahoo.com](mailto:ljcollier2003@yahoo.com)



**From:** [Carol E Gentry](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:55:13 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Carol E Gentry  
[cgentry439@gmail.com](mailto:cgentry439@gmail.com)

**From:** [Jana Perinchief](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:55:10 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Jana Perinchief  
[janasg@gmail.com](mailto:janasg@gmail.com)

**From:** [Karen Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:54:18 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

US Methane emissions from livestock and natural gas are nearly equal.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Karen Anderson  
[distantstarka@cs.com](mailto:distantstarka@cs.com)

**From:** [Michael Hegemeyer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:54:17 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Michael Hegemeyer  
[michaelhegemeyer@yahoo.com](mailto:michaelhegemeyer@yahoo.com)

**From:** [Jacqui Skill](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:54:15 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Jacqui Skill  
[jjinparadise@gmail.com](mailto:jjinparadise@gmail.com)

**From:** [Gilia Humrich](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:54:12 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Gilia Humrich  
[ghumrich@gmail.com](mailto:ghumrich@gmail.com)

**From:** [Beverly Foster](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:54:09 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

“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.”

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Beverly Foster  
[hwlyfstr@aol.com](mailto:hwlyfstr@aol.com)

**From:** [Greg Pennington](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:54:06 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Please protect the native tule elk from being culled in our National Seashore.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Greg Pennington  
[greglpennington@aol.com](mailto:greglpennington@aol.com)



**From:** [Janis Millu](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:53:31 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Janis Millu  
[ijanis51@yahoo.com](mailto:ijanis51@yahoo.com)

**From:** [Karen Spradlin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:53:30 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Karen Spradlin  
[wohlbold\\_2000@yahoo.com](mailto:wohlbold_2000@yahoo.com)

**From:** [Gordon Wood](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:53:21 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Gordon Wood  
[transhuman@earthlink.net](mailto:transhuman@earthlink.net)

**From:** [Jacqueline Cutler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:53:18 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Jacqueline Cutler  
[snjcutler@gmail.com](mailto:snjcutler@gmail.com)

**From:** [Meredith Erickson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:53:15 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Meredith Erickson  
[mericksonatl@gmail.com](mailto:mericksonatl@gmail.com)

**From:** [Tucker Thomas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:53:14 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Tucker Thomas  
[tuckerthomas51@yahoo.com](mailto:tuckerthomas51@yahoo.com)

**From:** [Charlotte Ritchie](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:53:11 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Charlotte Ritchie  
[charsritchie@hotmail.com](mailto:charsritchie@hotmail.com)

**From:** [Anita Wisch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:53:07 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extends and expands the destructive cattle operations in PRNS.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Anita Wisch  
[awisch629@aol.com](mailto:awisch629@aol.com)



**From:** [Erica Johanson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:53:06 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Erica Johanson  
[stoneybrook50@comcast.net](mailto:stoneybrook50@comcast.net)

**From:** [Jorge De Cecco](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:52:23 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Jorge De Cecco  
[bndass@yahoo.com](mailto:bndass@yahoo.com)

**From:** [sheryl Gillespie](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:52:23 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
sheryl Gillespie  
[sherylg303@gmail.com](mailto:sherylg303@gmail.com)

**From:** [Anthony Mehle](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:52:18 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne’s disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS’ plan. The impacts of ranching in PRNS is well documented in the NPS’ own EIS - ranching must end in PRNS.

Sincerely,  
Anthony Mehle  
[amehle123@gmail.com](mailto:amehle123@gmail.com)

**From:** [Michael Lee](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:52:16 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Michael Lee  
[maleect@aol.com](mailto:maleect@aol.com)

**From:** [Brenda Gamache](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:52:13 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [Barry Medlin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:52:07 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Barry Medlin  
[docmedlin@hotmail.com](mailto:docmedlin@hotmail.com)

**From:** [Elaine Eudy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:51:07 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Elaine Eudy  
[alpha\\_b@bellsouth.net](mailto:alpha_b@bellsouth.net)



**From:** [Jay Rice](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:49:50 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary.and caution that these approaches are greenwashing attempts, like “Clean Coal.”

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Jay Rice  
[jaysrice@comcast.net](mailto:jaysrice@comcast.net)

**From:** [Juliet Lamont](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:49:40 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Juliet Lamont  
[graywaggle@me.com](mailto:graywaggle@me.com)

**From:** [Janet Peterson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:49:35 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

The impacts of ranching in PRNS is well documented in the NPS’ own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Janet Peterson  
[jananjimp@aol.com](mailto:jananjimp@aol.com)

**From:** [Pablo Bobe](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:49:31 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Pablo Bobe

**From:** [Warwick Hansell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:49:30 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Warwick Hansell  
[landrovie@yahoo.com](mailto:landrovie@yahoo.com)

**From:** [Annie Phillips](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:49:24 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

US Methane emissions from livestock and natural gas are nearly equal.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Annie Phillips  
SilverBlueWolf3@hotmail.com

**From:** [cathyelizabeth.levin](mailto:cathyelizabeth.levin)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:49:17 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
cathyelizabeth levin  
[silverdoubloon@yahoo.com](mailto:silverdoubloon@yahoo.com)

**From:** [Pamela Olsen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:49:13 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Pamela Olsen  
[pamee11793@yahoo.com](mailto:pamee11793@yahoo.com)



**From:** [NANCY OR](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:49:10 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

US Methane emissions from livestock and natural gas are nearly equal.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
NANCY OR  
ORSETNA@AOL.COLM

**From:** [Brian Meadows](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:49:09 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Cows produce 150 billion gallons of methane per day.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

The NPS is being sued because the NPS’ Plan is violating the NPS’ own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS’ plan inconsistent with the Coastal Act.

Sincerely,  
Brian Meadows  
[mickmauspost@gmail.com](mailto:mickmauspost@gmail.com)

**From:** [Eric Meyer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:48:15 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Eric Meyer  
[Stickwork@gmail.com](mailto:Stickwork@gmail.com)

**From:** [Jacqueline Miller](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:48:12 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Jacqueline Miller  
[miller.jackie624@gmail.com](mailto:miller.jackie624@gmail.com)

**From:** [Caephren McKenna](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:39:08 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Cows produce 150 billion gallons of methane per day.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Caephren McKenna  
[caephren@gmail.com](mailto:caephren@gmail.com)

**From:** [P.FRANCIS](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:33:07 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
P FRANCIS  
PETER@GEORGESCAMERA.COM

**From:** [Jean Cameron](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:31:09 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Jean Cameron  
[jpcaml@cox.net](mailto:jpcaml@cox.net)

**From:** [Elizabeth Coover](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:17:06 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Elizabeth Coover  
[betsycoover@gmail.com](mailto:betsycoover@gmail.com)



**From:** [Jodi Igard](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:54:07 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Cows produce 150 billion gallons of methane per day.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Jodi Igard  
[smokinj91604@yahoo.com](mailto:smokinj91604@yahoo.com)

**From:** [Rebecca Infusino](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:53:08 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Rebecca Infusino  
[beccainfusino@gmail.com](mailto:beccainfusino@gmail.com)

**From:** [Chris Harrington](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:47:09 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

The CCC should not approve of a Climate Action Strategy from the NPS that can’t prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The NPS’ plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS’s extensive past history, the Commission can expect more of the same. It’s important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Chris Harrington  
[cpharr707@gmail.com](mailto:cpharr707@gmail.com)

**From:** ["Rev. David Sickles"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:40:12 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Rev. David Sickles

**From:** [Bradley Tomko](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:40:07 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Bradley Tomko  
batomko@yahoo.com

**From:** [Emma Stein](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:39:18 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Emma Stein  
ecstein12@gmail.com

**From:** [Ava Donovan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:39:10 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Ava Donovan  
[adonovan@miyokos.com](mailto:adonovan@miyokos.com)

**From:** [Edgar Achury](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:37:08 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

It is of great concern politicians at the local and federal level support the NPS’s actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let’s restore our National Seashore

Sincerely,  
Edgar Achury  
[eachury@miyokos.com](mailto:eachury@miyokos.com)



**From:** [jacqueline Eubanks](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:36:09 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
jacqueline Eubanks  
[Lynnja1040@gmail.com](mailto:Lynnja1040@gmail.com)

**From:** [Patricia Sanchez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:36:07 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary, and caution that these approaches are greenwashing attempts, like “Clean Coal.”

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Patricia Sanchez  
[luvmy75@aol.com](mailto:luvmy75@aol.com)

**From:** [Marina James](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:33:08 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Marina James  
[kaleultrarunner@gmail.com](mailto:kaleultrarunner@gmail.com)

**From:** [Susanna Purucker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:30:14 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Susanna Purucker  
[spurucker@bellsouth.net](mailto:spurucker@bellsouth.net)

**From:** [Patricia Vineski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:28:12 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Patricia Vineski  
[vineskipatricia@gmail.com](mailto:vineskipatricia@gmail.com)

**From:** [Marie DeJournette](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:26:08 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Marie DeJournette  
[mariedejournette@gmail.com](mailto:mariedejournette@gmail.com)

**From:** [Andrea Weinstein](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:22:19 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

"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."

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Andrea Weinstein  
[whimdessert@gmail.com](mailto:whimdessert@gmail.com)

**From:** [Matias Marini](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:20:07 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Matias Marini  
[tutevermouth@gmail.com](mailto:tutevermouth@gmail.com)



**From:** [Erin Gort](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:19:09 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Erin Gort  
[gort.erin@gmail.com](mailto:gort.erin@gmail.com)

**From:** [Nicholas Klamm](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:18:12 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Assuming the NPS’ strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg “The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock “does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate.” The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS’ strategy.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Nicholas Klamm  
[nklamm@miyokos.com](mailto:nklamm@miyokos.com)

**From:** [Anthony Halterlein](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:15:08 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Anthony Halterlein  
[wackford@dtccom.net](mailto:wackford@dtccom.net)

**From:** [Miyoko Schinner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:08:17 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Miyoko Schinner  
[miyokoschinner@gmail.com](mailto:miyokoschinner@gmail.com)

**From:** [Jessica Langford](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:08:17 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Jessica Langford  
[jessica.langford1@btinternet.com](mailto:jessica.langford1@btinternet.com)

**From:** [Maki Aizawa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 1:08:09 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Maki Aizawa  
[maki@makiiaizawa.com](mailto:maki@makiiaizawa.com)

**From:** [Carol Jagiello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 12:57:07 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Carol Jagiello  
[cjags91@optonline.net](mailto:cjags91@optonline.net)

**From:** [Lisa Maragon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 12:56:11 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Lisa Maragon  
[lcmaragon@aol.com](mailto:lcmaragon@aol.com)



**From:** [Juan Lanza](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 12:47:07 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Juan Lanza  
[jdspear@lbl.gov](mailto:jdspear@lbl.gov)

**From:** [Marnie Gaede](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 12:35:15 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Marnie Gaede  
[chacopress@icloud.com](mailto:chacopress@icloud.com)

**From:** [alan bedard](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 12:19:12 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
alan bedard  
[arbedard73@gmail.com](mailto:arbedard73@gmail.com)

**From:** [Marcy Taylor Pattinson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 12:18:12 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Marcy Taylor Pattinson  
[marquisstp@gmail.com](mailto:marquisstp@gmail.com)

**From:** [Ellen Koivisto](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 12:02:08 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary.and caution that these approaches are greenwashing attempts, like “Clean Coal.”

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Ellen Koivisto  
[offstage@earthlink.net](mailto:offstage@earthlink.net)

**From:** [Nancy Neumann](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:47:14 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Nancy Neumann  
[NancyNeumann@t-online.de](mailto:NancyNeumann@t-online.de)

**From:** [Debby Butterworth](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:29:09 AM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Debby Butterworth  
[debbybutterworth@gmail.com](mailto:debbybutterworth@gmail.com)

**From:** [Kenya Lopez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:24:08 AM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS’ plan (CD-0006-02 ).

Sincerely,  
Kenya Lopez  
[kenyalopez@yshoo.com](mailto:kenyalopez@yshoo.com)



**From:** [Cheryl Watters](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:23:11 AM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Cheryl Watters  
[cheryl40978@aol.com](mailto:cheryl40978@aol.com)

**From:** [Ellin OLeary](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:02:08 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Ellin OLeary  
[ellin.oleary@gmail.com](mailto:ellin.oleary@gmail.com)

**From:** [Jeffery Garcia](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:01:14 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

"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."

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Jeffery Garcia  
[jeffery@mcn.org](mailto:jeffery@mcn.org)

**From:** [Ellin OLeary](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 11:01:10 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Ellin OLeary  
[ellin.oleary@gmail.com](mailto:ellin.oleary@gmail.com)

**From:** [Christa Rounsavall](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 10:38:09 AM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Christa Rounsavall

**From:** [Flo Kamp](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:51:10 AM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Flo Kamp  
[kampflo2@gmail.com](mailto:kampflo2@gmail.com)

**From:** [Theresa Harlan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:45:11 AM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

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

**From:** [Jill Mulato](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:39:15 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS’ plan. The impacts of ranching in PRNS is well documented in the NPS’ own EIS - ranching must end in PRNS.

Sincerely,  
Jill Mulato  
[JillMulato@cox.net](mailto:JillMulato@cox.net)



**From:** [Michelle Ganote](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:32:22 AM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Michelle Ganote  
[michelleganote@gmail.com](mailto:michelleganote@gmail.com)

**From:** [Yael Shimshon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:22:10 AM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Yael Shimshon  
[yaels211@gmail.com](mailto:yaels211@gmail.com)

**From:** [Mara Silver](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:20:57 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Mara Silver  
[mnsilver2@verizon.net](mailto:mnsilver2@verizon.net)

**From:** [kristy love key](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:15:13 AM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
kristy love key  
[kristykey0324@gmail.com](mailto:kristykey0324@gmail.com)

**From:** [Kristy Loya Key](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:14:20 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Kristy Loya Key  
[kristykey0324@gmail.com](mailto:kristykey0324@gmail.com)

**From:** ["R. Zierikzee"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 9:10:23 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

US Methane emissions from livestock and natural gas are nearly equal.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
R. Zierikzee  
[inor@earthlink.net](mailto:inor@earthlink.net)

**From:** [Mark Burton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:51:14 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Cows produce 150 billion gallons of methane per day.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Mark Burton  
[markburton500@msn.com](mailto:markburton500@msn.com)

**From:** [Mai Hermann](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:43:22 AM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like “Clean Coal.”

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS’s extensive past history, the Commission can expect more of the same. It’s important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Mai Hermann  
[laura.hassin@gmail.com](mailto:laura.hassin@gmail.com)



**From:** [Jordyn Gates](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:32:17 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Jordyn Gates  
[marchjo.G99@outlook.com](mailto:marchjo.G99@outlook.com)

**From:** [Nancy Chismar](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:30:10 AM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Nancy Chismar  
[nanlc999@optonline.net](mailto:nanlc999@optonline.net)

**From:** [Kathy Aub](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:27:13 AM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Kathy Aub  
[tarponebay@comcast.net](mailto:tarponebay@comcast.net)

**From:** [Donna Klipstein](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:09:07 AM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future “potential” water quality improvements. This “see no evil” attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Donna Klipstein  
[donnaklipstein@gmail.com](mailto:donnaklipstein@gmail.com)

**From:** [LaRee Maguire](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 8:08:10 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
LaRee Maguire  
[laree@sonic.net](mailto:laree@sonic.net)

**From:** [Kris Cedar](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:55:21 AM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Kris Cedar  
[kriscedarphoto@gmail.com](mailto:kriscedarphoto@gmail.com)

**From:** [Kris Cedar](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:54:10 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Kris Cedar  
[kriscedarphoto@gmail.com](mailto:kriscedarphoto@gmail.com)

**From:** [Susan Mayer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:54:08 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Susan Mayer  
[artersa@att.net](mailto:artersa@att.net)



**From:** [Karen Rome](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:39:09 AM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Karen Rome  
[chong.l@netzero.net](mailto:chong.l@netzero.net)

**From:** [Mary Buerman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:19:10 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Mary Buerman  
[olrlm@yahoo.com](mailto:olrlm@yahoo.com)

**From:** [Patricia Hein](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:03:12 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Patricia Hein  
rehpah7128@yahoo.com

**From:** [Margaret McGinnis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 7:00:11 AM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Margaret McGinnis  
[margaretmcginnis@verizon.net](mailto:margaretmcginnis@verizon.net)

**From:** [Sarah Sowambur](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 6:19:24 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Sarah Sowambur  
[sarah.sowambur@gmail.com](mailto:sarah.sowambur@gmail.com)

**From:** [Lynne Wiley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:18:12 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

“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.”

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Lynne Wiley  
[lwiley@rochester.rr.com](mailto:lwiley@rochester.rr.com)

**From:** [Lorraine Gorman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:13:08 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Lorraine Gorman  
[lkj09@optimum.net](mailto:lkj09@optimum.net)

**From:** [humberto fabrette](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 5:05:20 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

US Methane emissions from livestock and natural gas are nearly equal.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please do not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
humberto fabrette  
[humbertofabrette@gmail.com](mailto:humbertofabrette@gmail.com)



**From:** [Christie Hartmann](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:58:08 AM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The NPS now has the ability to cull some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency

**From:** [Marilyn Koff](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:32:08 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state’s highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS’ results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it’s time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It’s past time for the cows to be removed from the seashore.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Marilyn Koff  
[tapdancinginlasvegas@netzero.net](mailto:tapdancinginlasvegas@netzero.net)

**From:** ["Bellinda Rolf-jansen"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:23:10 AM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Bellinda Rolf-jansen  
belly-j@hotmail.com

**From:** [Jennifer Books](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 4:03:09 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Jennifer Books  
[pigeonsave@aol.com](mailto:pigeonsave@aol.com)

**From:** [Tia Simon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:56:12 AM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Tia Simon  
[tia.40@hotmail.com](mailto:tia.40@hotmail.com)

**From:** [Lu Morano](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 2:39:11 AM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

US Methane emissions from livestock and natural gas are nearly equal.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Lu Morano  
[worldphoenixrising@gmail.com](mailto:worldphoenixrising@gmail.com)

**From:** [Mireille Dumont](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 12:33:13 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Mireille Dumont  
[mireille.dumont@gmail.com](mailto:mireille.dumont@gmail.com)

**From:** [Jodi Wick](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Wednesday, March 30, 2022 12:02:09 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Jodi Wick  
[jodi20f@gmail.com](mailto:jodi20f@gmail.com)



**From:** [Connie Kirkham](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:55:09 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

"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."

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Connie Kirkham  
[cks2email@yahoo.com](mailto:cks2email@yahoo.com)

**From:** [Robert Raven](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:46:07 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Robert Raven  
[robraven60@gmail.com](mailto:robraven60@gmail.com)

**From:** [Merrill Loomis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:43:09 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Merrill Loomis  
[merryloo@gmail.com](mailto:merryloo@gmail.com)

**From:** [Steve Schramm](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:23:08 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on "best management practices", but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Steve Schramm  
[reelsafari@gmail.com](mailto:reelsafari@gmail.com)

**From:** [Kenda Francis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:20:14 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Kenda Francis  
[kendafrancis@yahoo.com](mailto:kendafrancis@yahoo.com)

**From:** [Kenda Francis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:20:09 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Kenda Francis  
[kendafrancis@yahoo.com](mailto:kendafrancis@yahoo.com)

**From:** [Linda Reilly](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:34:09 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Linda Reilly  
[lindanreilly@gmail.com](mailto:lindanreilly@gmail.com)

**From:** [Krista Reynolds](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:14:13 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Krista Reynolds  
[krismarie33@gmail.com](mailto:krismarie33@gmail.com)



**From:** [Lois Yuen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:58:06 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Lois Yuen  
[loisy1@gmail.com](mailto:loisy1@gmail.com)

**From:** [Stephanie Nunez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:20:16 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Stephanie Nunez  
[evilbitch\\_13@yahoo.com](mailto:evilbitch_13@yahoo.com)

**From:** [Sherry Weiland](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:59:08 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Sherry Weiland  
shertylw9@verizon.net

**From:** ["Dr. Robert and Ginny Bonometti - LTC USA Ret"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:35:10 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Dr. Robert and Ginny Bonometti - LTC USA Ret  
[RJBonometti@gmail.com](mailto:RJBonometti@gmail.com)

**From:** [Siler Panowski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:29:16 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Siler Panowski  
[silerp@gmail.com](mailto:silerp@gmail.com)

**From:** [Dana Parnay](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:11:10 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Dana Parnay  
[dparnay@netzero.net](mailto:dparnay@netzero.net)

**From:** [Thoi Pham](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:07:09 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Thoi Pham  
[thoipham@gmail.com](mailto:thoipham@gmail.com)

**From:** [Autumn Phipps](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:05:08 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Autumn Phipps  
[odetoautumn@hotmail.com](mailto:odetoautumn@hotmail.com)



**From:** ["G. Saffren"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:00:14 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (Enterococcus is another large genus of bacteria)."

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

**From:** [Corinne Johnson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:59:14 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Corinne Johnson  
[corinneleejohnson@gmail.com](mailto:corinneleejohnson@gmail.com)

**From:** [Melissa Warfield](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:51:23 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Melissa Warfield  
[melissawarfield@yahoo.com](mailto:melissawarfield@yahoo.com)

**From:** [Whitney Wagner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:51:17 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Whitney Wagner  
[whitney.wagner@gmail.com](mailto:whitney.wagner@gmail.com)

**From:** [Elaine Michaud](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:41:15 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Elaine Michaud  
[studiums@pacbell.net](mailto:studiums@pacbell.net)

**From:** [Aldana Santto](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:34:11 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

US Methane emissions from livestock and natural gas are nearly equal.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Aldana Santto  
[aldana\\_santto@yahoo.com](mailto:aldana_santto@yahoo.com)

**From:** [Deborah Dahlgren](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:28:17 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Deborah Dahlgren  
[dahlgrendeborah@gmail.com](mailto:dahlgrendeborah@gmail.com)

**From:** [Andrew Ferguson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:21:20 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Andrew Ferguson  
[andyf@sonic.net](mailto:andyf@sonic.net)



**From:** ["June Elliott-Cattell"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:17:16 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
June Elliott-Cattell  
[cattellmail@hotmail.com](mailto:cattellmail@hotmail.com)

**From:** [Mark Feldman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:11:23 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Mark Feldman  
[happeevegan@gmail.com](mailto:happeevegan@gmail.com)

**From:** [A George Beeler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:11:07 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
A George Beeler  
[agbcomm@sonic.net](mailto:agbcomm@sonic.net)

**From:** [A George Beeler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:09:22 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
A George Beeler  
[agbcomm@sonic.net](mailto:agbcomm@sonic.net)

**From:** [Arden Green](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:06:10 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Arden Green  
[ardenj13@yahoo.com](mailto:ardenj13@yahoo.com)

**From:** [Leslie Burton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:04:29 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium Escherichia coli (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (Enterococcus is another large genus of bacteria)."

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Leslie Burton  
[leslie.burton.prof@gmail.com](mailto:leslie.burton.prof@gmail.com)

**From:** [Janet Forman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:56:09 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Janet Forman  
[giselle351@gmail.com](mailto:giselle351@gmail.com)

**From:** [Kate Crowley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:46:09 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Kate Crowley  
[ravenkate49@hotmail.com](mailto:ravenkate49@hotmail.com)



**From:** [John Barger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:44:31 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Cows produce 150 billion gallons of methane per day.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
John Barger  
[john@johnbarger.com](mailto:john@johnbarger.com)

**From:** [Lori Beth Kidd](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:44:20 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Lori Beth Kidd  
[lbkflorida@gmail.com](mailto:lbkflorida@gmail.com)

**From:** [Deirdre Coyne](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:10:07 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Deirdre Coyne  
[doodlessf@comcast.net](mailto:doodlessf@comcast.net)

**From:** [Rachel Griffiths](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:08:17 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Rachel Griffiths  
[firechik@comcast.net](mailto:firechik@comcast.net)

**From:** [Rachel Griffiths](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:08:08 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Rachel Griffiths  
[firechik@comcast.net](mailto:firechik@comcast.net)

**From:** [Peter Thai](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:03:17 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Peter Thai  
[pthai83@gmail.com](mailto:pthai83@gmail.com)

**From:** [Julie Ford](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:00:24 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Julie Ford  
[jford29105@aol.com](mailto:jford29105@aol.com)

**From:** [sue.saltzman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:54:15 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
sue saltzman  
[sydssue@hotmail.com](mailto:sydssue@hotmail.com)



**From:** [Nina Clausen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:51:25 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Please protect the native tule elk from being culled in our National Seashore.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Nina Clausen  
[onehousedragon@gmail.com](mailto:onehousedragon@gmail.com)

**From:** [Lynne Stietzel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:42:10 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Lynne Stietzel  
[lynne.stietzel@gmail.com](mailto:lynne.stietzel@gmail.com)

**From:** [Katie Carroll](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:38:12 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Cows produce 150 billion gallons of methane per day.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Katie Carroll  
kcarroll11@outlook.com

**From:** [Jeff Thayer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:34:19 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Jeff Thayer  
[scubapong@yahoo.com](mailto:scubapong@yahoo.com)

**From:** [Gary Goetz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:26:08 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Gary Goetz  
[gag888@hotmail.com](mailto:gag888@hotmail.com)

**From:** [Erich Rex](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:53:20 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Erich Rex  
[erichrex@hotmail.com](mailto:erichrex@hotmail.com)

**From:** [Anna Lukaszewicz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:51:28 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Anna Lukaszewicz  
[ania13@juno.com](mailto:ania13@juno.com)

**From:** [Chris Pedone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:51:17 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Chris Pedone  
[mickbellini@hotmail.com](mailto:mickbellini@hotmail.com)



**From:** [Lisa Janson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:49:07 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Lisa Janson  
[Ljanson118@yahoo.com](mailto:Ljanson118@yahoo.com)

**From:** [Rebecca Zavada](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:47:17 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

The CCC’s mission is to protect and enhance the California coast. It reads “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.”

Per the CCC’s mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [Patricia Packer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:35:08 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Patricia Packer  
[pattiac@nycap.rr.com](mailto:pattiac@nycap.rr.com)

**From:** [gabby zaldumbide](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:34:10 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

“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.”

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS’ plan (CD-0006-02 ).

Sincerely,  
gabby zaldumbide  
[gabriela@huntersofcolor.org](mailto:gabriela@huntersofcolor.org)

**From:** [Mel Wright](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:33:13 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Mel Wright  
[Mel@tirn.net](mailto:Mel@tirn.net)

**From:** [Ellen Koivisto](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:30:22 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Ellen Koivisto  
[offstage@earthlink.net](mailto:offstage@earthlink.net)

**From:** [Greg Schafer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:29:07 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn’t just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn’t remove the cows from Pt. Reyes.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8’ fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS’ plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS’ plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS’ plan

Sincerely,  
Greg Schafer

**From:** [Sheila Ward](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:24:18 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher’s plan.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Sheila Ward  
[asopao@yahoo.com](mailto:asopao@yahoo.com)



**From:** [Susan King](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:10:18 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Cows produce 150 billion gallons of methane per day.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Susan King  
[srking@value.net](mailto:srking@value.net)

**From:** [Lisa Hilyer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:59:32 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Lisa Hilyer  
[mountnsage@yahoo.com](mailto:mountnsage@yahoo.com)

**From:** ["Helen Rowe-Drake"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:56:22 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS’ plan (CD-0006-02 ).

Sincerely,  
Helen Rowe-Drake  
[luckystarllamas@verizon.net](mailto:luckystarllamas@verizon.net)

**From:** [Sharon Carlson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:53:09 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne’s disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Sharon Carlson  
[mr.furley@live.com](mailto:mr.furley@live.com)

**From:** [Jimmy Flatt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:51:23 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Jimmy Flatt  
[jimmyvf318@gmail.com](mailto:jimmyvf318@gmail.com)

**From:** [Bruno Courbage](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:50:08 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Bruno Courbage  
[bruno.courbage@gmail.com](mailto:bruno.courbage@gmail.com)

**From:** [Antje Peters](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:49:09 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Antje Peters  
[petersantje@hotmail.com](mailto:petersantje@hotmail.com)

**From:** [Greg Hyatt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:47:16 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Cows produce 150 billion gallons of methane per day.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Kindly act in the best interest of the public good.

Sincerely,  
Greg Hyatt  
ghyatt\_4@hotmail.com



**From:** [Mary Zack](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:46:08 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Mary Zack  
[mlzack@web.de](mailto:mlzack@web.de)

**From:** [Haley Getz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:45:23 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Haley Getz  
[hmgetz9@gmail.com](mailto:hmgetz9@gmail.com)

**From:** [Vicki Johnson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:43:14 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Vicki Johnson  
[vickikristinejohnson@gmail.com](mailto:vickikristinejohnson@gmail.com)

**From:** [Derek Lewis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:35:24 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Dairy farms and cattle ranching don’t belong in a national park. They contribute to climate change. Don’t be fooled by false “greenwashing” claims, about “regenerative grazing” or “carbon farming.” Those concepts are promoted by big money interests, but their overly optimistic claims aren’t published in referenced journals.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS’ plan

Sincerely,  
Derek Lewis  
[dlew16@gmail.com](mailto:dlew16@gmail.com)

**From:** [David Boyer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:34:17 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
David Boyer  
[david.boyer@alumni.stanford.edu](mailto:david.boyer@alumni.stanford.edu)

**From:** ["Nicole BONGIOVANNI-Lewis"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:33:11 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Nicole BONGIOVANNI-Lewis  
[econico13@gmail.com](mailto:econico13@gmail.com)

**From:** [Alan Kiviat](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:27:11 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

US Methane emissions from livestock and natural gas are nearly equal.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Alan Kiviat  
[alank5e@earthlink.net](mailto:alank5e@earthlink.net)

**From:** [Kelly Henderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:25:25 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Cows produce 150 billion gallons of methane per day.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Kelly Henderson  
[kellyozz@yahoo.com](mailto:kellyozz@yahoo.com)



**From:** [Julija Merljak](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:25:13 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Julija Merljak  
[planetjulija@yahoo.com](mailto:planetjulija@yahoo.com)

**From:** [thalia lubin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:25:09 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
thalia lubin  
[thalia@thaliaproductions.com](mailto:thalia@thaliaproductions.com)

**From:** [Amy McManus](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:23:24 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Amy McManus

**From:** [Glenn Hufnagel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:15:17 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS’ plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS’ plan.

Sincerely,  
Glenn Hufnagel  
[gphufnagel@hotmail.com](mailto:gphufnagel@hotmail.com)

**From:** [Glenn Hufnagel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:14:29 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Glenn Hufnagel  
[gphufnagel@hotmail.com](mailto:gphufnagel@hotmail.com)

**From:** [Jacqueline Wolfe](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:09:10 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Jacqueline Wolfe  
[jwolfe087@gmail.com](mailto:jwolfe087@gmail.com)

**From:** [Richard Kite](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:08:15 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Richard Kite  
[coloneledamvc@aol.com](mailto:coloneledamvc@aol.com)

**From:** [robert cobb](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:00:33 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
robert cobb  
[cobbking11@aol.com](mailto:cobbking11@aol.com)



**From:** [freddie williams](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:00:15 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
freddie williams  
fwilliams@tiscali.co.za

**From:** [josh loria](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:57:15 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
josh loria  
[joshloria@gmail.com](mailto:joshloria@gmail.com)

**From:** [Whitney Watters](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:55:24 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

**From:** [Krin Asselta](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:32:07 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Krin Asselta  
[buffington@centurytel.net](mailto:buffington@centurytel.net)

**From:** [joy sassoon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:31:43 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

**From:** [Cynthia Powell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:25:35 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Cynthia Powell  
[aruchty@value.net](mailto:aruchty@value.net)

**From:** [Kathie Kingett](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:25:32 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Kathie Kingett  
[kingett.kathie@gmail.com](mailto:kingett.kathie@gmail.com)

**From:** [Camilo Echavarria Uribe](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:24:50 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Camilo Echavarria Uribe  
[olimacu@yahoo.com](mailto:olimacu@yahoo.com)



**From:** [Ann Tagawa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:21:34 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Ann Tagawa  
[anntagawa@msn.com](mailto:anntagawa@msn.com)

**From:** [Barbara Hanson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:09:20 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Barbara Hanson  
[patamadre@aol.com](mailto:patamadre@aol.com)

**From:** [Carol Leuenberger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:58:10 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Carol Leuenberger  
[catberger@comcast.net](mailto:catberger@comcast.net)

**From:** [Carol Leuenberger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:57:30 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Carol Leuenberger  
[catberger@comcast.net](mailto:catberger@comcast.net)

**From:** [Norma Wallace](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:54:24 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extends and expands the destructive cattle operations in PRNS.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Please protect the native tule elk from being culled in our National Seashore.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Norma Wallace  
587njw@gmail.com

**From:** [Ken Martin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:48:21 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS’ own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Ken Martin  
[sunaru8@yahoo.com](mailto:sunaru8@yahoo.com)

**From:** [Valerie Coshnear](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:44:42 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Valerie Coshnear

**From:** [Jeff Thayer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:44:22 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

"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."

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Jeff Thayer  
[scubapong@yahoo.com](mailto:scubapong@yahoo.com)



**From:** [Christine Roeffen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:39:07 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,

**From:** ["Melvin D. Cheitlin"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:34:53 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Melvin D. Cheitlin  
[mellac22@comcast.net](mailto:mellac22@comcast.net)

**From:** [Freddy Rohlen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:33:24 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Freddy Rohlen  
[freddyghorses@yahoo.com](mailto:freddyghorses@yahoo.com)

**From:** [ilene gudelsky](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:29:28 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
ilene gudelsky  
[ilene@owlfeatherfarm.com](mailto:ilene@owlfeatherfarm.com)

**From:** [Elisa Townshend](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:29:21 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Kindly act in the best interest of the public good.

Sincerely,  
Elisa Townshend  
[esjq@msn.com](mailto:esjq@msn.com)

**From:** [Lisa Salazar](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:20:49 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Lisa Salazar  
[lisajunior@netscape.com](mailto:lisajunior@netscape.com)

**From:** [Sandy Kavoyianni](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:18:54 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Sandy Kavoyianni  
[sankavol@hotmail.com](mailto:sankavol@hotmail.com)

**From:** [Lori Beth Kidd](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:15:15 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Please protect the native tule elk from being culled in our National Seashore.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Lori Beth Kidd  
[lbkflorida@gmail.com](mailto:lbkflorida@gmail.com)



**From:** [Barbara Kuecker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:07:55 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Barbara Kuecker  
[barbarakuecker@gmail.com](mailto:barbarakuecker@gmail.com)

**From:** [Allison Orvin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:57:10 AM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Dairy farms and cattle ranching don’t belong in a national park. They contribute to climate change. Don’t be fooled by false “greenwashing” claims, about “regenerative grazing” or “carbon farming.” Those concepts are promoted by big money interests, but their overly optimistic claims aren’t published in referenced journals.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS’s extensive past history, the Commission can expect more of the same. It’s important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,

**From:** [Elizabeth Scherbak](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:48:11 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Elizabeth Scherbak  
[lizardes@msn.com](mailto:lizardes@msn.com)

**From:** [Astrid van der Geest](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:40:54 AM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Astrid van der Geest  
[astridvandergeest@hotmail.nl](mailto:astridvandergeest@hotmail.nl)

**From:** [Jason Nichols](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:39:24 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,

**From:** [Silvana Borrelli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:38:05 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Silvana Borrelli  
silbor13@verizon.net

**From:** [Kenneth Lapointe](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:35:23 AM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8’ fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS’ plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS’ plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Kenneth Lapointe  
[incredistical@outlook.com](mailto:incredistical@outlook.com)

**From:** [ADRIANA TRASNEA](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:31:58 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

“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.”

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
ADRIANA TRASNEA  
[adrianatrasnea@yahoo.com](mailto:adrianatrasnea@yahoo.com)



**From:** [Andrea Rohr](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:28:12 AM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Andrea Rohr  
[anrohr@anrohr.de](mailto:anrohr@anrohr.de)

**From:** [Carolyn Borg](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:27:56 AM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Carolyn Borg  
[cospotts@gmail.com](mailto:cospotts@gmail.com)

**From:** [Lorenz Steininger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:27:15 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Lorenz Steininger  
[schreibdemstein@posteo.de](mailto:schreibdemstein@posteo.de)

**From:** [Jennifer Schally](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:25:40 AM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

"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."

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Jennifer Schally  
[NordicChicMN@aol.com](mailto:NordicChicMN@aol.com)

**From:** [Suehan Estrada](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:21:01 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

US Methane emissions from livestock and natural gas are nearly equal.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Suehan Estrada  
[suehanb@yahoo.com](mailto:suehanb@yahoo.com)

**From:** [Judith S Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:18:28 AM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Judith S Anderson  
[jskanderson@gmail.com](mailto:jskanderson@gmail.com)

**From:** [Victor Carmichael](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:17:52 AM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Victor Carmichael  
[vcarmichael@comcast.net](mailto:vcarmichael@comcast.net)

**From:** [Takeo Tabuchi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 11:07:35 AM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Takeo Tabuchi  
[takeotabuchi1@yahoo.com](mailto:takeotabuchi1@yahoo.com)



**From:** [Merz Peggy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:59:35 AM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Merz Peggy  
[redfoxwalks@gmail.com](mailto:redfoxwalks@gmail.com)

**From:** [Keli Hendricks](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:59:11 AM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary. and caution that these approaches are greenwashing attempts, like "Clean Coal."

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Keli Hendricks  
[darbyhendricks@yahoo.com](mailto:darbyhendricks@yahoo.com)

**From:** [Elisa kleven](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:53:47 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Elisa kleven  
[elisakleven7@gmail.com](mailto:elisakleven7@gmail.com)

**From:** [Sheri Cardo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:50:42 AM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, “The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention.” This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Sheri Cardo  
[scardo33@aol.com](mailto:scardo33@aol.com)

**From:** [Marce Walsh](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:50:21 AM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Marce Walsh  
[marcewalsh@yahoo.com](mailto:marcewalsh@yahoo.com)

**From:** [Jackie Demarais](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:48:17 AM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Jackie Demarais  
[jackie@suddenlink.net](mailto:jackie@suddenlink.net)

**From:** [Sheila Ward](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:42:28 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Sheila Ward  
[asopao@yahoo.com](mailto:asopao@yahoo.com)

**From:** [Diana Duffy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:41:38 AM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Diana Duffy  
Ddaside88@sbcglobal.net



**From:** [Jenifer Johnson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:32:35 AM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.’s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of “Clean Coal.” I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let’s restore our National Seashore

Sincerely,  
Jenifer Johnson  
[valerianalexander@yahoo.com](mailto:valerianalexander@yahoo.com)

**From:** [Holly Rose](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:25:18 AM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Holly Rose  
[hbeerose@yahoo.com](mailto:hbeerose@yahoo.com)

**From:** [Anthony Donnici](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:22:44 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Anthony Donnici  
[eaglv@aol.com](mailto:eaglv@aol.com)

**From:** [Michael Ballin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:15:13 AM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Michael Ballin  
[ballin\\_5\\_3@yahoo.com](mailto:ballin_5_3@yahoo.com)

**From:** [s.smith](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:08:12 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don’t resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn’t enable natural composting, and results in water pollution.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

The impacts of ranching in PRNS is well documented in the NPS’ own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
s.smith  
[sbskier@hotmail.com](mailto:sbskier@hotmail.com)

**From:** [cara lou wicks](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:06:16 AM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
cara lou wicks  
[cara\\_lou@cox.net](mailto:cara_lou@cox.net)

**From:** [amy trusso](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:05:10 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
amy trusso  
[amytrusso@gmail.com](mailto:amytrusso@gmail.com)

**From:** [dorothy blake](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 10:05:06 AM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
dorothy blake  
[dorothyblake0@gmail.com](mailto:dorothyblake0@gmail.com)



**From:** [Aloysius Wald](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:57:06 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Aloysius Wald  
[ajwaldtwo@yahoo.com](mailto:ajwaldtwo@yahoo.com)

**From:** [Susan Gottfried](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:55:13 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (Enterococcus is another large genus of bacteria)."

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

**From:** [Richard Ordonez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:55:07 AM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Richard Ordonez  
[kingrpo@aol.com](mailto:kingrpo@aol.com)

**From:** [Silvia Bertano](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:52:10 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Silvia Bertano  
[silvia.bertano@comune.torino.it](mailto:silvia.bertano@comune.torino.it)

**From:** [Kate Llewellyn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:51:08 AM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like “Clean Coal.”

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Kate Llewellyn  
[kredman.cetologist@gmail.com](mailto:kredman.cetologist@gmail.com)

**From:** [Tracey Kleber](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:42:18 AM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Tracey Kleber  
[tracey.kleber@gmail.com](mailto:tracey.kleber@gmail.com) [your location will go here]

**From:** [Louis Rhodes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:40:16 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Louis Rhodes  
an\_doc@yahoo.com [your location will go here]

**From:** [Jon Charles Falk](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:31:11 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Jon Charles Falk  
jcfalk@icloud.com [your location will go here]



**From:** [Judy Moran](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:28:08 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Judy Moran  
[timstarjudy@aol.com](mailto:timstarjudy@aol.com) [your location will go here]

**From:** [LESLIE Krygier](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:25:13 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Please protect the native tule elk from being culled in our National Seashore.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
LESLIE Krygier  
bitterdregs1313@gmail.com [your location will go here]

**From:** [Parrie Henderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:18:09 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Parrie Henderson  
[parriehendok@icloud.com](mailto:parriehendok@icloud.com) [your location will go here]

**From:** [Annette Varady](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:13:12 AM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Annette Varady  
[annettevarady@gmail.com](mailto:annettevarady@gmail.com) [your location will go here]

**From:** [Laetitia Amadei](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:09:10 AM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

I urge the Commission to not support the NPS’ plan to cull native Tule elk in PRNS.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Laetitia Amadei  
laetitia8269@outlook.fr [your location will go here]

**From:** [Tracey Mangus](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:05:14 AM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Tracey Mangus

**From:** [Roy Falk](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:05:10 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Roy Falk  
royfalk@icloud.com [your location will go here]

**From:** ["Sheri Varner-Munt"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 9:00:15 AM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (*E. coli*) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded *E. coli* limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Sheri Varner-Munt  
sevarner@aol.com [your location will go here]



**From:** [Ragen Serra](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:59:09 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Cows produce 150 billion gallons of methane per day.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Ragen Serra  
kermitsqst@yahoo.com [your location will go here]

**From:** [Robbe Verhofste](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:56:12 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on "best management practices", but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Robbe Verhofste  
robbekev@gmail.com [your location will go here]

**From:** [T Sherrill](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:54:20 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

“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.”

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
T Sherrill  
[tawny.sherrill@csulb.edu](mailto:tawny.sherrill@csulb.edu) [your location will go here]

**From:** [Don Faia](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:53:20 AM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Please protect the native tule elk from being culled in our National Seashore.

Kindly act in the best interest of the public good.

Sincerely,  
Don Faia  
[dfaia@cruzio.com](mailto:dfaia@cruzio.com) [your location will go here]

**From:** [sally beauford](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:49:15 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
sally beauford  
[sallybeauford@yahoo.com](mailto:sallybeauford@yahoo.com) [your location will go here]

**From:** [vicki hughes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:45:10 AM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
vicki hughes  
vdh2810@gmail.com [your location will go here]

**From:** [Jaedra Luke](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:44:23 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Jaedra Luke  
[jaedraluke@gmail.com](mailto:jaedraluke@gmail.com) [your location will go here]

**From:** [Brent Durand](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:42:15 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Brent Durand  
[brentdurand@gmail.com](mailto:brentdurand@gmail.com) [your location will go here]



**From:** [Deana Piedra](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:41:08 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Deana Piedra  
[deanapiedra@gmail.com](mailto:deanapiedra@gmail.com) [your location will go here]

**From:** [Quida Jacobs](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:34:15 AM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Quida Jacobs  
qlj888@yahoo.com [your location will go here]

**From:** [Joseph Vincent](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:29:18 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher’s plan.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Joseph Vincent  
conrua@juno.com [your location will go here]

**From:** [M Rute Correia](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:26:15 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
M Rute Correia  
[mrute@optonline.net](mailto:mrute@optonline.net) [your location will go here]

**From:** [PAMELA LICHTENWALNER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:25:07 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
PAMELA LICHTENWALNER  
[pslichtenwalner@icloud.com](mailto:pslichtenwalner@icloud.com) [your location will go here]

**From:** [Bruce Cratty](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:20:29 AM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Bruce Cratty  
[brucecratty@gmail.com](mailto:brucecratty@gmail.com) [your location will go here]

**From:** [Heidi ahlstrand](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:19:14 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Heidi ahlstrand  
[ironrancher@yahoo.com](mailto:ironrancher@yahoo.com) [your location will go here]

**From:** [Laura Long](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:18:14 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Laura Long  
lauralynn7@gmail.com [your location will go here]



**From:** [Denise Frullo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:15:08 AM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Denise Frullo  
[denise@fefe.com](mailto:denise@fefe.com) [your location will go here]

**From:** [Tanya Glasser](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:09:13 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Tanya Glasser  
[tglasserco@gmail.com](mailto:tglasserco@gmail.com) [your location will go here]

**From:** [Amy Cyr](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:08:08 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Amy Cyr  
[acyr44@comcast.net](mailto:acyr44@comcast.net) [your location will go here]

**From:** [scott mavis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 8:07:08 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
scott mavis  
scottmavis24@gmail.com [your location will go here]

**From:** [Vic Bostock](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:51:10 AM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Vic Bostock  
[care4animals@hotmail.co.uk](mailto:care4animals@hotmail.co.uk) [your location will go here]

**From:** [Jamie Johnson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:51:07 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Jamie Johnson  
[jamiejohnsonnyc@gmail.com](mailto:jamiejohnsonnyc@gmail.com) [your location will go here]

**From:** [Sandra Materi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:49:12 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [Scott Webb](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:47:06 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

It’s disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future “potential” water quality improvements. This “see no evil” attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore’s GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an ‘off-set’.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS’ plan. The impacts of ranching in PRNS is well documented in the NPS’ own EIS - ranching must end in PRNS.

Sincerely,  
Scott Webb  
scottwebb02@gmail.com [your location will go here]



**From:** [Maggie Kalabakas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:43:10 AM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnne's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Maggie Kalabakas  
[maggie\\_torsten@yahoo.com](mailto:maggie_torsten@yahoo.com) [your location will go here]

**From:** [Veronica Bourassa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:42:14 AM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Veronica Bourassa  
RORLOWSKE@GMAIL.COM [your location will go here]

**From:** [Noble Woodward](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:34:17 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Noble Woodward  
kwcw@roadrunner.com [your location will go here]

**From:** [Roxanne Christie](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:34:14 AM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

US Methane emissions from livestock and natural gas are nearly equal.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Roxanne Christie  
dawnfromtheoak@gmail.com [your location will go here]

**From:** [Becky Monger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:33:11 AM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels of E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact on marine life in the ocean.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

**From:** [gina sanfilippo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:31:09 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
gina sanfilippo  
[gina.sanfilippo@gmail.com](mailto:gina.sanfilippo@gmail.com) [your location will go here]

**From:** [Michael Weaver](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:29:12 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Michael Weaver  
[mjweaves74@yahoo.com](mailto:mjweaves74@yahoo.com) [your location will go here]

**From:** [Cheryl Reynolds](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:26:09 AM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don’t resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn’t enable natural composting, and results in water pollution.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Cheryl Reynolds  
[greybraham@icloud.com](mailto:greybraham@icloud.com) [your location will go here]



**From:** [Kathy Mason](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:25:08 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Kathy Mason  
kmason633@yahoo.com [your location will go here]

**From:** [Barb Tokunaga](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:21:18 AM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Barb Tokunaga

**From:** [Kathleen Mireault](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:17:13 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Kathleen Mireault  
kathymireault2012@gmail.com [your location will go here]

**From:** [Charles SMITH](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:16:15 AM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Charles SMITH  
[cssasmith@yahoo.com](mailto:cssasmith@yahoo.com) [your location will go here]

**From:** [Tiffany Nicol](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:16:15 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Tiffany Nicol  
[nicol.tiffany@yahoo.com](mailto:nicol.tiffany@yahoo.com) [your location will go here]

**From:** [Deborah Perry](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:14:10 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Deborah Perry  
debperry1225@gmail.com [your location will go here]

**From:** [Jessica Heiden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:08:20 AM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

Assuming the NPS’ strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg “The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock “does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate.” The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS’ strategy.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Jessica Heiden  
jlhiowa2@yahoo.com [your location will go here]

**From:** [Anne Barker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:07:14 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Anne Barker  
[annenb@alumni.iwu.edu](mailto:annenb@alumni.iwu.edu) [your location will go here]



**From:** [Adriana Nunez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:05:12 AM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Adriana Nunez  
[angelfish69@aol.com](mailto:angelfish69@aol.com) [your location will go here]

**From:** [Mari Elvi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:02:09 AM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Mari Elvi  
[mariaelvira631@gmail.com](mailto:mariaelvira631@gmail.com) [your location will go here]

**From:** [SONJA FRANZ](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:02:07 AM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

**From:** [Shari Iacone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:01:13 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

US Methane emissions from livestock and natural gas are nearly equal.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Shari Iacone  
siacone@iisl.com [your location will go here]

**From:** [Rhonda Johnson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 7:01:06 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Please protect the native tule elk from being culled in our National Seashore.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Rhonda Johnson  
rdtgjohnson@hotmail.com [your location will go here]

**From:** [Susan M Ponchot](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:58:16 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Susan M Ponchot

**From:** [Jean Riehl](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:58:12 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Jean Riehl  
[jean\\_carol\\_anna@yahoo.com](mailto:jean_carol_anna@yahoo.com) [your location will go here]

**From:** [kathy beeney](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:56:06 AM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
kathy beeney  
kat\_beeney@yahoo.com [your location will go here]



**From:** [Michael White](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:55:14 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Michael White  
white837@aol.com [your location will go here]

**From:** [J Lee](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:52:11 AM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,

**From:** [Debbie Willis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:52:05 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

The NPS’ plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public’s vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don’t miss this opportunity. Do what’s right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Debbie Willis  
wdwillis3@yahoo.com [your location will go here]

**From:** [Steve Overton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:48:10 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Steve Overton  
[steveo2857@yahoo.co.uk](mailto:steveo2857@yahoo.co.uk) [your location will go here]

**From:** [Kay Tsenin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:40:09 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Kay Tsenin  
rassors@gmail.com [your location will go here]

**From:** [Mark Rule](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:37:12 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The NPS’ plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Mark Rule  
[rule5181@gmail.com](mailto:rule5181@gmail.com) [your location will go here]

**From:** [Mark Klugiewicz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:34:16 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Mark Klugiewicz  
[tmklugs@sbcglobal.net](mailto:tmklugs@sbcglobal.net) [your location will go here]

**From:** [KELLY KREISER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:29:11 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
KELLY KREISER  
kelly.kreiser69@gmail.com [your location will go here]



**From:** [Charles Hammock](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:28:20 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Charles Hammock  
[charleshammock1966@gmail.com](mailto:charleshammock1966@gmail.com) [your location will go here]

**From:** [Justin KREISER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:28:13 AM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Justin KREISER  
[justinkreiser6@gmail.com](mailto:justinkreiser6@gmail.com) [your location will go here]

**From:** [Brittney Hammock](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:27:20 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Brittney Hammock  
[brittneyhammock1999@gmail.com](mailto:brittneyhammock1999@gmail.com) [your location will go here]

**From:** [KELLY KREISER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:27:16 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
KELLY KREISER  
[kelly.kreiser@advantagesolutions.net](mailto:kelly.kreiser@advantagesolutions.net) [your location will go here]

**From:** [Claude Robert](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:25:07 AM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Claude Robert  
ldruide@hotmail.com [your location will go here]

**From:** [Tammy King](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:23:18 AM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Tammy King  
[hotjenday@aol.com](mailto:hotjenday@aol.com) [your location will go here]

**From:** [Jane Broendel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:21:10 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Jane Broendel  
jbthatch01@gmail.com [your location will go here]

**From:** [Lozz Starseed](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:21:08 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Please protect the native tule elk from being culled in our National Seashore.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Lozz Starseed  
[lozzie666@hotmail.co.uk](mailto:lozzie666@hotmail.co.uk) [your location will go here]



**From:** [Sherry Macias](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:19:08 AM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn’t just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn’t remove the cows from Pt. Reyes.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The CCC’s mission is to protect and enhance the California coast. It reads “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.”

Per the CCC’s mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [Sonia Romero Villanueva](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:11:08 AM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Sonia Romero Villanueva  
pupycom123@yahoo.es [your location will go here]

**From:** [Eric Wollscheid](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:11:07 AM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Eric Wollscheid  
ewoll8@hotmail.com [your location will go here]

**From:** [Christina Lee](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:09:20 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS’ plan and help us save our Seashore.

Sincerely,  
Christina Lee  
[chewett2@gmail.com](mailto:chewett2@gmail.com) [your location will go here]

**From:** [Melissa Gaskins](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:09:12 AM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Melissa Gaskins  
gaskinshockey@gmail.com [your location will go here]

**From:** [Jennifer Parks](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:09:09 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Jennifer Parks  
[jenjer2@gmail.com](mailto:jenjer2@gmail.com) [your location will go here]

**From:** [Richard Johnson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 6:05:13 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Richard Johnson  
[jazzpacnw@yahoo.com](mailto:jazzpacnw@yahoo.com) [your location will go here]

**From:** [Rickey Buttery](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:59:07 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Rickey Buttery  
rickyb7771st@aol.com [your location will go here]



**From:** [SUSAN SILLARS](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:58:12 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
SUSAN SILLARS  
strings.attached1@gmail.com [your location will go here]

**From:** [Sarah Hamilton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:58:07 AM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Kindly act in the best interest of the public good.

Sincerely,  
Sarah Hamilton  
bigguy287@twcnr.com [your location will go here]

**From:** [Martha Burton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:57:09 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Martha Burton  
martyb1@tampabay.rr.com [your location will go here]

**From:** [Rickey Buttery](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:56:09 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Rickey Buttery  
rickyb7771st@aol.com [your location will go here]

**From:** [Nikki Wojtalik](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:55:11 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Nikki Wojtalik  
nwojtalik@hotmail.com [your location will go here]

**From:** [Bettina Lorenz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:54:09 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Bettina Lorenz  
[aliti05@aol.com](mailto:aliti05@aol.com) [your location will go here]

**From:** [Francesca Bortoli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:54:08 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Francesca Bortoli  
[fran.bj@tiscali.it](mailto:fran.bj@tiscali.it) [your location will go here]

**From:** [Steve S](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:53:14 AM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Steve S  
washingtonstevesmith@yahoo.com [your location will go here]



**From:** [RICHARD BAKER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:49:10 AM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
RICHARD BAKER  
penpoint@hvc.rr.com [your location will go here]

**From:** ["Ardis Karr-Robak"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:31:11 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Ardis Karr-Robak  
[ardis.rainbowflower@gmail.com](mailto:ardis.rainbowflower@gmail.com) [your location will go here]

**From:** [Suzanne Butler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:26:13 AM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Suzanne Butler  
sbois2001@yahoo.com [your location will go here]

**From:** [Bridget Irons](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:23:09 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Cows produce 150 billion gallons of methane per day.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Bridget Irons  
whitetaileddeer@verizon.net [your location will go here]

**From:** [Sylvana Arguello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:21:12 AM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Sylvana Arguello  
SantaCruz305@aol.com [your location will go here]

**From:** [Alexandria Hendrix](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:20:11 AM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Alexandria Hendrix  
lexilhendrix@gmail.com [your location will go here]

**From:** [Deborah Dahlgren](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:20:10 AM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Please protect the native tule elk from being culled in our National Seashore.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Deborah Dahlgren  
[dahlgrendeborah@gmail.com](mailto:dahlgrendeborah@gmail.com) [your location will go here]

**From:** [Maria Rua](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:16:07 AM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Maria Rua  
phoenix\_chick\_2000@yahoo.com [your location will go here]



**From:** [Adam DOnofrio](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:05:12 AM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Adam DOnofrio  
[bigadfromlb@comcast.net](mailto:bigadfromlb@comcast.net) [your location will go here]

**From:** [Lorri Sawyer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:03:07 AM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Lorri Sawyer  
lorrisawyer@gmail.com [your location will go here]

**From:** [Vasileios Grigoriou](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 5:00:14 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Vasileios Grigoriou  
bill99998@hotmail.com [your location will go here]

**From:** [Yee Yean Lim](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:52:05 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

“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.”

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8’ fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS’ plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS’ plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS’ plan and help us save our Seashore.

Sincerely,  
Yee Yean Lim  
ianlyy@gmail.com [your location will go here]

**From:** [francis mastri](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:41:10 AM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
francis mastri  
famastri@me.com [your location will go here]

**From:** [Russelle Morrison](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:23:09 AM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Russelle Morrison

**From:** [Karen Stritzinger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:23:06 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

I urge the Commission to not support the NPS’ plan to cull native Tule elk in PRNS.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Karen Stritzinger  
[karenstritz@gmail.com](mailto:karenstritz@gmail.com) [your location will go here]

**From:** [Michael Rynes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:21:07 AM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Michael Rynes  
discubs697@hotmail.com [your location will go here]



**From:** [Lisa Collon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:16:14 AM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Lisa Collon

**From:** [Elizabeth Casanova](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:10:11 AM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let’s restore our National Seashore

Sincerely,  
Elizabeth Casanova  
[lizcasanova@hotmail.com](mailto:lizcasanova@hotmail.com) [your location will go here]

**From:** [Phillippa Hilsden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:04:10 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Phillippa Hilsden  
fluffykittens55@protonmail.com [your location will go here]

**From:** [Carolyn Marion](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 4:00:13 AM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Carolyn Marion  
nyyankes23@aol.com [your location will go here]

**From:** [Zandy Huff](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:59:07 AM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Zandy Huff  
[zandy.huff@yahoo.com](mailto:zandy.huff@yahoo.com) [your location will go here]

**From:** [Dee Warenycia](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:58:17 AM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

US Methane emissions from livestock and natural gas are nearly equal.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Dee Warenycia  
warbler5@aol.com [your location will go here]

**From:** [ahmed Hadidi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:52:09 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

US Methane emissions from livestock and natural gas are nearly equal.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
ahmed Hadidi  
[ahmed.hadidi@veolia.com](mailto:ahmed.hadidi@veolia.com) [your location will go here]

**From:** [shirley mills](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:35:08 AM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Kindly act in the best interest of the public good.

Sincerely,  
shirley mills  
shirleymills12@yahoo.co.uk [your location will go here]



**From:** [Peg Kucek](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:23:12 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Peg Kucek  
[pegkucek@gmail.com](mailto:pegkucek@gmail.com) [your location will go here]

**From:** [Peggy Powell Morgan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:22:07 AM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Peggy Powell Morgan  
[peggypowell340@yahoo.com](mailto:peggypowell340@yahoo.com) [your location will go here]

**From:** [Marina Sagardua](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:21:09 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.’s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of “Clean Coal.” I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Marina Sagardua  
[sagarzazu@gmail.com](mailto:sagarzazu@gmail.com) [your location will go here]

**From:** [Arifa Isabel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:17:07 AM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Arifa Isabel  
[arifa.isabel@gmail.com](mailto:arifa.isabel@gmail.com) [your location will go here]

**From:** [Krisanne Baker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:09:07 AM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Krisanne Baker  
bakerk93@yahoo.com [your location will go here]

**From:** [Mitzi Frank](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 3:00:10 AM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Mitzi Frank  
[frankmitzi@gmail.com](mailto:frankmitzi@gmail.com) [your location will go here]

**From:** [Mark Hirshfeld](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:59:08 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Please protect the native tule elk from being culled in our National Seashore.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Mark Hirshfeld  
tcsunnyday3@yahoo.com [your location will go here]

**From:** [Mitzi Frank](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:58:07 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Mitzi Frank  
[frankmitzi@gmail.com](mailto:frankmitzi@gmail.com) [your location will go here]



**From:** [Lisa Koehl](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:56:09 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Lisa Koehl  
[lkoehl@snet.net](mailto:lkoehl@snet.net) [your location will go here]

**From:** [Diane Eisenhower](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:53:07 AM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Diane Eisenhower  
sailawaydi@aol.com [your location will go here]

**From:** [Sarah Gould](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:50:07 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Sarah Gould  
sarah.gould16@yahoo.com [your location will go here]

**From:** [Joseph Quirk](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:45:09 AM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Joseph Quirk  
jqurk66@gmail.com [your location will go here]

**From:** [Rayline Dean](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:45:07 AM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Rayline Dean  
RaylineDean@gmail.com [your location will go here]

**From:** [Gustavo Gomes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:42:10 AM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8’ fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS’ plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS’ plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Gustavo Gomes  
[gustavogomes4@hotmail.com](mailto:gustavogomes4@hotmail.com) [your location will go here]

**From:** [Jean Naples](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:40:08 AM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term ‘clean coal’ used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let’s restore our National Seashore

Sincerely,  
Jean Naples  
jeannaples7@gmail.com [your location will go here]

**From:** [Eunice Sousa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 2:03:09 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Eunice Sousa  
[bluelightt@sapo.pt](mailto:bluelightt@sapo.pt) [your location will go here]



**From:** ["Vivienne Ben-Shir"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:53:07 AM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Kindly act in the best interest of the public good.

Sincerely,  
Vivienne Ben-Shir  
[vivienne.ben.shir@talktalk.net](mailto:vivienne.ben.shir@talktalk.net) [your location will go here]

**From:** [Yannis KARAOUZAS](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:52:06 AM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Yannis KARAOUZAS  
[j\\_karaouzas@hotmail.com](mailto:j_karaouzas@hotmail.com) [your location will go here]

**From:** ["carol-alida pennington"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:50:07 AM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
carol-alida pennington  
carol.alida@protonmail.com [your location will go here]

**From:** [Michaela Reisser](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:29:10 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Michaela Reisser  
[michaelareisser@t-online.de](mailto:michaelareisser@t-online.de) [your location will go here]

**From:** [Olimpia Storoni](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:29:07 AM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Olimpia Storoni  
[olimpia.storoni@libero.it](mailto:olimpia.storoni@libero.it) [your location will go here]

**From:** [Kerstin Selhausen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:28:09 AM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Kerstin Selhausen  
[kerstin.selhausen@googlemail.com](mailto:kerstin.selhausen@googlemail.com) [your location will go here]

**From:** [Steve Vicuna](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:28:05 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Steve Vicuna  
[stevevicuna4@gmail.com](mailto:stevevicuna4@gmail.com) [your location will go here]

**From:** [maurizia burlando](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:23:09 AM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
maurizia burlando  
[maurizia.burlando@live.it](mailto:maurizia.burlando@live.it) [your location will go here]



**From:** [Sija Sur](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:21:07 AM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Kindly act in the best interest of the public good.

Sincerely,  
Sija Sur  
sija1810@gmail.com [your location will go here]

**From:** [Cynthia Lewis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:18:06 AM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Cynthia Lewis  
Chanteuse7@gmail.com [your location will go here]

**From:** [robert micth](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:15:08 AM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
robert micth

**From:** [Ainga Dobbelaere](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 1:09:06 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Ainga Dobbelaere  
ainga-d@hotmail.com [your location will go here]

**From:** [David Brodnax](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:49:06 AM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
David Brodnax  
[brodnax@alumni.northwestern.edu](mailto:brodnax@alumni.northwestern.edu) [your location will go here]

**From:** [MariaGrazia Sanguin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:48:07 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
MariaGrazia Sanguin  
p168@libero.it [your location will go here]

**From:** [MariaGrazia Sanguin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:47:17 AM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
MariaGrazia Sanguin  
p168@libero.it [your location will go here]

**From:** [caroline themm](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:47:12 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
caroline themm  
ninacw@aol.vom [your location will go here]



**From:** [Carrie Bezler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:47:10 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

US Methane emissions from livestock and natural gas are nearly equal.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Carrie Bezler  
[carriebezler@posteo.net](mailto:carriebezler@posteo.net) [your location will go here]

**From:** [The Rev Dr Edward Kern](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:46:08 AM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
The Rev Dr Edward Kern  
[amazinggrace3@sbcglobal.net](mailto:amazinggrace3@sbcglobal.net) [your location will go here]

**From:** [Ken Wu](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:44:08 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Ken Wu  
[kenkw@comcast.net](mailto:kenkw@comcast.net) [your location will go here]

**From:** [Thomas Talbot](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:39:05 AM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Because of livestock at PRNS, the free roaming tule elk have been infected with Johne's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Thomas Talbot  
ntalbot56@gmail.com [your location will go here]

**From:** [Thomas Talbot](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:38:07 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Thomas Talbot  
[tnthalbot56@gmail.com](mailto:tnthalbot56@gmail.com) [your location will go here]

**From:** [Phyllis J Schmidt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:37:08 AM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Phyllis J Schmidt  
[jacq23400@gmail.com](mailto:jacq23400@gmail.com) [your location will go here]

**From:** [Dorothea Stephan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:36:08 AM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS’ plan (CD-0006-02)

Sincerely,  
Dorothea Stephan  
[dorotel@t-online.de](mailto:dorotel@t-online.de) [your location will go here]

**From:** [serena ruffilli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:33:07 AM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
serena ruffilli  
koalina74@gmail.com [your location will go here]



**From:** ["Judy Miller-Lyons"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:30:07 AM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Judy Miller-Lyons  
[earthlady@optonline.net](mailto:earthlady@optonline.net) [your location will go here]

**From:** [Debra Cameron](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:27:07 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Cows produce 150 billion gallons of methane per day.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Debra Cameron  
stardlc@hotmail.com [your location will go here]

**From:** [Elisabeth Bechmann](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:26:07 AM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Cows produce 150 billion gallons of methane per day.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The impacts of ranching in PRNS is well documented in the NPS’ own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Elisabeth Bechmann  
[elisabeth.bechmann@kstp.at](mailto:elisabeth.bechmann@kstp.at) [your location will go here]

**From:** [Marsha Adams](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:22:06 AM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

**From:** [lois harris](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:13:07 AM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
lois harris  
msclois@aol.com [your location will go here]

**From:** [Jeff Hoffman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:10:08 AM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Kindly act in the best interest of the public good.

Sincerely,  
Jeff Hoffman  
hefjeff.hof@gmail.com [your location will go here]

**From:** ["Dan O'Toole"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Tuesday, March 29, 2022 12:08:08 AM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Dan O'Toole  
danotoole8@hotmail.com [your location will go here]

**From:** [Javier Tavora](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:56:06 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary. and caution that these approaches are greenwashing attempts, like "Clean Coal."

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Javier Tavora  
[chinajavier@gmail.com](mailto:chinajavier@gmail.com) [your location will go here]



**From:** [Jim Chisholm](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:55:09 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Jim Chisholm  
[jimchism@shaw.ca](mailto:jimchism@shaw.ca) [your location will go here]

**From:** [Amy Harlib](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:52:06 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Amy Harlib  
[amyharlib@e-activism.com](mailto:amyharlib@e-activism.com) [your location will go here]

**From:** ["Mrs. Frankie Harris"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:42:09 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Mrs. Frankie Harris  
frankiegone2dogs@aol.com [your location will go here]

**From:** ["Ira Gerard-DiBenedetto"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:42:08 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Ira Gerard-DiBenedetto  
iragerard@hotmail.com [your location will go here]

**From:** [cara artman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:41:06 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
cara artman  
[singingcara@yahoo.com](mailto:singingcara@yahoo.com) [your location will go here]

**From:** [Bea Prinz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:38:07 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Bea Prinz  
besopri@aol.de [your location will go here]

**From:** [Chris Dennis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:36:07 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Chris Dennis  
[chris.dennis91@gmail.com](mailto:chris.dennis91@gmail.com) [your location will go here]

**From:** [Juan Masello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:33:09 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.



**From:** [Jennifer Kopczynski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:33:06 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on "best management practices", but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Jennifer Kopczynski  
adivachanna@aol.com [your location will go here]

**From:** [Thomas Scott](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:30:13 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Thomas Scott  
tcfelix145@gmail.com [your location will go here]

**From:** [Susan Delles](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:28:09 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary.and caution that these approaches are greenwashing attempts, like “Clean Coal.”

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

The NPS is being sued because the NPS’ Plan is violating the NPS’ own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS’ plan inconsistent with the Coastal Act.

Sincerely,  
Susan Delles  
[sdelles@jeffnet.org](mailto:sdelles@jeffnet.org) [your location will go here]

**From:** [Edeltraut Renk](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:27:09 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Edeltraut Renk  
[edeltraut.renk@alice.it](mailto:edeltraut.renk@alice.it) [your location will go here]

**From:** [Candace LaPorte](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:11:05 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Candace LaPorte  
candiphantom@aol.com [your location will go here]

**From:** [Axa Tolonen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:02:08 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Axa Tolonen  
[aktolonen@protonmail.com](mailto:aktolonen@protonmail.com) [your location will go here]

**From:** [Jason Fish](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:54:10 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Cows produce 150 billion gallons of methane per day.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Jason Fish  
[collectivesole@aol.com](mailto:collectivesole@aol.com) [your location will go here]

**From:** [Myriam Martinez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:49:06 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Please provide our native Tule Elk from the NPS’ and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Myriam Martinez  
myriammd21@comcast.net [your location will go here]



**From:** [Meg Paton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:45:14 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Meg Paton  
spay\_your\_pet@yahoo.com [your location will go here]

**From:** [Kaayla Roth](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:45:11 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

US Methane emissions from livestock and natural gas are nearly equal.

Please protect the native tule elk from being culled in our National Seashore.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Kaayla Roth  
kaaylaroth1@gmail.com [your location will go here]

**From:** [Meg Paton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:45:07 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Meg Paton  
spay\_your\_pet@yahoo.com [your location will go here]

**From:** ["Cathy 2813984883"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:44:08 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Cathy 2813984883  
[c.sikes54@att.net](mailto:c.sikes54@att.net) [your location will go here]

**From:** [Teseo Staffilani](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:43:08 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Teseo Staffilani  
tesilibeo@hotmail.it [your location will go here]

**From:** [Ken Wilson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:41:06 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

“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.”

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS’ purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California’s endemic Tule elk.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Ken Wilson  
talontours@yahoo.com [your location will go here]

**From:** ["Jörg Gaiser"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:39:06 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Jörg Gaiser  
Joerggaier@gmx.net [your location will go here]

**From:** [Fredrik Larsson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:30:11 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Fredrik Larsson  
larsson15@hotmail.com [your location will go here]



**From:** [Jennifer Kelly](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:29:08 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Please protect the native tule elk from being culled in our National Seashore.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Jennifer Kelly  
[je2niferk@att.net](mailto:je2niferk@att.net) [your location will go here]

**From:** [Rosalyn Kamp](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:24:10 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Rosalyn Kamp  
[rosalynkamp@gmail.com](mailto:rosalynkamp@gmail.com) [your location will go here]

**From:** [Karen Carpenter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:24:09 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Karen Carpenter  
[karenjcarpenter5@comcast.net](mailto:karenjcarpenter5@comcast.net) [your location will go here]

**From:** [Joan Wager](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:24:06 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Joan Wager  
[joanwager2004@comcast.net](mailto:joanwager2004@comcast.net) [your location will go here]

**From:** [Maureen Burke](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:17:07 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

I hope that the CCC will do whatever it can to remedy the situation.

**From:** [SIGRID RAMOS](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:15:09 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
SIGRID RAMOS  
sigrid1943@msn.com [your location will go here]

**From:** [Molly Huddleston](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:14:08 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Molly Huddleston  
[mollyb@pacific.net](mailto:mollyb@pacific.net) [your location will go here]

**From:** [SIGRID RAMOS](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:14:07 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
SIGRID RAMOS  
sigrid1943@msn.com [your location will go here]



**From:** [Leslie Burpo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:12:06 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it’s time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It’s past time for the cows to be removed from the seashore.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne’s disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS’s extensive past history, the Commission can expect more of the same. It’s important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Leslie Burpo  
[leslieburpo1@gmail.com](mailto:leslieburpo1@gmail.com) [your location will go here]

**From:** [Annette Vargas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:08:08 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS’ plan, as it is time to end these unnecessary impacts.

Sincerely,  
Annette Vargas  
[annettevargas02@gmail.com](mailto:annettevargas02@gmail.com) [your location will go here]

**From:** [Daniel Brower](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:08:08 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Daniel Brower  
[pacuarecholo@yahoo.com](mailto:pacuarecholo@yahoo.com) [your location will go here]

**From:** [Mercedes Benet](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:07:08 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Mercedes Benet  
[benetmercedes@gmail.com](mailto:benetmercedes@gmail.com) [your location will go here]

**From:** [Joan Keijer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:05:06 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Joan Keijer  
[joankeijer@yahoo.com](mailto:joankeijer@yahoo.com) [your location will go here]

**From:** [John Malloy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:03:08 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
John Malloy

**From:** [Lois nottingham](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:02:08 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Lois nottingham  
rosie2639@gmail.com [your location will go here]

**From:** [Nina Gondos](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:58:10 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Nina Gondos  
[ninaninettev@hotmail.com](mailto:ninaninettev@hotmail.com) [your location will go here]



**From:** [Ibrahim rexhepi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:56:17 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Ibrahim rexhepi  
[rexhepi.ibrahim@orange.fr](mailto:rexhepi.ibrahim@orange.fr) [your location will go here]

**From:** [Nathalie Guyonvarch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:56:08 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Nathalie Guyonvarch  
[nathalia.letarnec@orange.fr](mailto:nathalia.letarnec@orange.fr) [your location will go here]

**From:** [Dee Green](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:52:06 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary. and caution that these approaches are greenwashing attempts, like “Clean Coal.”

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Dee Green  
[bdtgreen@msn.com](mailto:bdtgreen@msn.com) [your location will go here]

**From:** [Enid Cardinal](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:51:12 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Enid Cardinal  
enid0411@yahoo.com [your location will go here]

**From:** [Michelle Krueger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:50:07 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Michelle Krueger  
orca.song10@gmail.com [your location will go here]

**From:** [Kostas Korovilas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:49:12 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Kostas Korovilas  
[kostas.korovilas@gmail.com](mailto:kostas.korovilas@gmail.com) [your location will go here]

**From:** [Elaine Fischer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:42:05 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS’ purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California’s endemic Tule elk.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Elaine Fischer  
[efischer@workmail.com](mailto:efischer@workmail.com) [your location will go here]

**From:** [Emily Willoughby](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:41:08 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Emily Willoughby  
emilya57@comcast.net [your location will go here]



**From:** [Margaret Lohr](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:41:06 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause of the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Margaret Lohr  
sweepyzero@yahoo.com [your location will go here]

**From:** [Elaine Becker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:37:07 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Elaine Becker  
[elainebecker@yahoo.com](mailto:elainebecker@yahoo.com) [your location will go here]

**From:** [John Doucette](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:37:05 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johne's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
John Doucette

**From:** [Gayle Janzen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:35:12 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Gayle Janzen  
[cgjanzen@comcast.net](mailto:cgjanzen@comcast.net) [your location will go here]

**From:** [Debra Rehn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:35:09 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Debra Rehn  
[bibleeogirl@aol.com](mailto:bibleeogirl@aol.com) [your location will go here]

**From:** [Candy Bowman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:29:09 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Candy Bowman  
[canbowring@yahoo.com](mailto:canbowring@yahoo.com) [your location will go here]

**From:** [Edie Bruce](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:26:07 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Edie Bruce  
sheshell2@comcast.net [your location will go here]

**From:** [Dianne Matheny](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:25:09 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Dianne Matheny  
diannematheny1122@yahoo.com [your location will go here]



**From:** [Tanja Rieger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:25:07 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Tanja Rieger  
Gracecherry@web.de [your location will go here]

**From:** [Joan Milford](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:24:06 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Joan Milford  
[joanmilford@gmail.com](mailto:joanmilford@gmail.com) [your location will go here]

**From:** [Cara Barnhill](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:19:12 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Cara Barnhill  
[cara1083@gmail.com](mailto:cara1083@gmail.com) [your location will go here]

**From:** [Jill Kennedy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:18:12 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

“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.”

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Jill Kennedy  
[jillk525@gmail.com](mailto:jillk525@gmail.com) [your location will go here]

**From:** [Rub Good](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:18:09 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Rub Good  
[pridges@sunriver.org](mailto:pridges@sunriver.org) [your location will go here]

**From:** [Dede Dresser](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:17:09 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

The NPS is being sued because the NPS’ Plan is violating the NPS’ own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS’ plan inconsistent with the Coastal Act.

Sincerely,  
Dede Dresser  
[ddresser@sbcglobal.net](mailto:ddresser@sbcglobal.net) [your location will go here]

**From:** [Katha Kerr](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:13:15 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Katha Kerr  
[kathakerr@telus.net](mailto:kathakerr@telus.net) [your location will go here]

**From:** [Angela Gantos](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:13:08 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Angela Gantos  
amatlock51@yahoo.com [your location will go here]



**From:** [JAMES THOMAS](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:12:17 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore’s GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an ‘off-set’.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS’ plan

Sincerely,  
JAMES THOMAS  
JEEMZ@SONIC.NET [your location will go here]

**From:** [Zoe Harris](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:12:12 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Zoe Harris  
[zoezoe@yahoo.com](mailto:zoezoe@yahoo.com) [your location will go here]

**From:** [Suzanne Becket](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:12:06 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

US Methane emissions from livestock and natural gas are nearly equal.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Suzanne Becket  
8pawprints@sbcglobal.net [your location will go here]

**From:** [Beti Webb Trauth](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:11:11 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of “regenerative grazing” (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Beti Webb Trauth  
[lightpow@arcatanet.com](mailto:lightpow@arcatanet.com) [your location will go here]

**From:** [Michelle Hayward](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:06:08 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Michelle Hayward  
[kittyandmoose@yahoo.co.uk](mailto:kittyandmoose@yahoo.co.uk) [your location will go here]

**From:** [Jim Wilson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:03:14 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Jim Wilson  
rockworm46@yahoo.com [your location will go here]

**From:** ["Marcia Flannery"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:59:06 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Marcia Flannery  
[marciaflannery@stanfordalumni.org](mailto:marciaflannery@stanfordalumni.org) [your location will go here]

**From:** [Marisa Landsberg](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:58:07 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS’ plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Marisa Landsberg  
[marisalandsberg@verizon.net](mailto:marisalandsberg@verizon.net) [your location will go here]



**From:** [Margo Lovejoy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:50:08 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Margo Lovejoy  
[unicorns232005@yahoo.com](mailto:unicorns232005@yahoo.com) [your location will go here]

**From:** [Stephen Donnelly](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:49:11 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Stephen Donnelly  
tvc15ma@gmail.com [your location will go here]

**From:** [Lynette McLamb](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:47:06 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Lynette McLamb  
[lynnettemc@mac.com](mailto:lynnettemc@mac.com) [your location will go here]

**From:** [Davis Everett](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:43:06 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are "technically or financially infeasible" and "in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS"

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Davis Everett  
ddzeverett@gmail.com [your location will go here]

**From:** [Neli Teofilova](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:42:07 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Neli Teofilova  
oberon\_zoo@abv.bg [your location will go here]

**From:** [Kaatje Adams](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:40:15 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Kaatje Adams  
[kaatjeplanet@gmail.com](mailto:kaatjeplanet@gmail.com) [your location will go here]

**From:** [Jennifer Schmitz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:40:09 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Jennifer Schmitz  
sasscat32@hotmail.com [your location will go here]

**From:** [Linda Carroll](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:38:11 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Linda Carroll  
[lindalouise701184951@yahoo.com](mailto:lindalouise701184951@yahoo.com) [your location will go here]



**From:** [Jimmie Lunsford](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:37:11 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Jimmie Lunsford  
[jimmieleelunsford@yahoo.com](mailto:jimmieleelunsford@yahoo.com) [your location will go here]

**From:** [Victor Escobar](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:37:08 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne’s disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Victor Escobar  
sydbarrett74@gmail.com [your location will go here]

**From:** [Russell Weisz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:36:12 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Russell Weisz  
russweisz1@gmail.com [your location will go here]

**From:** [Liana Lang](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:36:08 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Liana Lang  
[lianalang79@yahoo.com](mailto:lianalang79@yahoo.com) [your location will go here]

**From:** [Patricia Purdy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:36:06 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Patricia Purdy  
[patricia.purdy@gmail.com](mailto:patricia.purdy@gmail.com) [your location will go here]

**From:** [Candice Johnson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:34:09 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Candice Johnson  
[wefivejohnsons@sbcglobal.net](mailto:wefivejohnsons@sbcglobal.net) [your location will go here]

**From:** [Margaret Keenan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:34:08 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (Enterococcus is another large genus of bacteria)."

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

**From:** [Lexie Cataldo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:31:07 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Lexie Cataldo  
[lexiecataldo@aol.com](mailto:lexiecataldo@aol.com) [your location will go here]



**From:** [Judith Cohen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:30:17 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Judith Cohen  
[jctcohen@yahoo.com](mailto:jctcohen@yahoo.com) [your location will go here]

**From:** [Aurora Doyon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:29:08 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Aurora Doyon  
auroradoyon@yahoo.com [your location will go here]

**From:** [Charlie Burns](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:27:24 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Charlie Burns  
[charlie@envsite.com](mailto:charlie@envsite.com) [your location will go here]

**From:** [kajsa engelsson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:27:23 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

Kindly act in the best interest of the public good.

Sincerely,  
kajsa engelsson  
[kajsa@lifeofmjau.com](mailto:kajsa@lifeofmjau.com) [your location will go here]

**From:** [Jon Anderholm](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:27:16 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn’t just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn’t remove the cows from Pt. Reyes.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Jon Anderholm  
xunbio@hotmail.com [your location will go here]

**From:** [Jon Anderholm](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:27:11 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Kindly act in the best interest of the public good.

Sincerely,  
Jon Anderholm  
xunbio@hotmail.com [your location will go here]

**From:** [janet oconnor](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:27:09 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
janet oconnor  
janoconnor415@gmail.com [your location will go here]

**From:** [Matt Maguire](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:25:10 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to



the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Matt Maguire  
mmaguire@crcnetworks.com [your location will go here]

**From:** [Harriet McCleary](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:24:11 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Harriet McCleary  
[mccleary@stolaf.edu](mailto:mccleary@stolaf.edu) [your location will go here]

**From:** [Elaine Woodruff](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:24:08 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Elaine Woodruff  
ew0220@sonic.net [your location will go here]

**From:** [David Burtis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:21:10 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
David Burtis  
[dborbit@earthlink.net](mailto:dborbit@earthlink.net) [your location will go here]

**From:** [Louise Butler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:21:07 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Louise Butler  
[nobluebonnet@gmail.com](mailto:nobluebonnet@gmail.com) [your location will go here]

**From:** [Denise Brennan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:18:14 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS’ own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnne's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS’ plan and help us save our Seashore.

Sincerely,  
Denise Brennan  
dbre657144@aol.com [your location will go here]

**From:** [Joyce Grajczyk](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:18:10 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Joyce Grajczyk  
[jag4848@comcast.net](mailto:jag4848@comcast.net) [your location will go here]

**From:** [Debbie Friesen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:16:07 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Kindly act in the best interest of the public good.

Sincerely,  
Debbie Friesen  
dfriesen@email.arizona.edu [your location will go here]



**From:** [Nina Monasevitch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:15:08 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Nina Monasevitch  
[oceanmana@hawaiiintel.net](mailto:oceanmana@hawaiiintel.net) [your location will go here]

**From:** [Joanna Martin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:14:07 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Joanna Martin  
[jamiem10martin@gmail.com](mailto:jamiem10martin@gmail.com) [your location will go here]

**From:** [Mark Giese](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:13:10 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS’ plan and help us save our Seashore.

Sincerely,  
Mark Giese  
m.mk@juno.com [your location will go here]

**From:** [Jennifer Scott](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:11:06 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians. It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Jennifer Scott  
[jjscott9@gmail.com](mailto:jjscott9@gmail.com) [your location will go here]

**From:** [Leslie Richardson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:10:14 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Leslie Richardson  
lbardolino@aol.com [your location will go here]

**From:** [regula hess](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:08:08 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
regula hess  
[regula.hess@wanadoo.fr](mailto:regula.hess@wanadoo.fr) [your location will go here]

**From:** [John Hoffman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:07:08 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
John Hoffman  
[jhoffman77@yahoo.com](mailto:jhoffman77@yahoo.com) [your location will go here]

**From:** [Christina Viljoen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:06:17 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

“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.”

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Christina Viljoen  
viljo3059@gmail.com [your location will go here]



**From:** [linda petrulias](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:06:12 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Please protect the native tule elk from being culled in our National Seashore.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
linda petrulias  
acmwc@comcast.net [your location will go here]

**From:** [Amber Gill](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:06:10 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Amber Gill  
[agillzooskittles@gmail.com](mailto:agillzooskittles@gmail.com) [your location will go here]

**From:** [Pamela Green](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:05:09 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Pamela Green  
pamgreen11@yahoo.com [your location will go here]

**From:** [Peter Kahigian](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:04:09 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Cows produce 150 billion gallons of methane per day.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Peter Kahigian  
p\_kahigian@hotmail.com [your location will go here]

**From:** [Francesca Reitano](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:02:07 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Francesca Reitano  
[freitano@gmail.com](mailto:freitano@gmail.com) [your location will go here]

**From:** [Gwen Nolte](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 8:01:12 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Gwen Nolte  
[gwenmolte@aol.com](mailto:gwenmolte@aol.com) [your location will go here]

**From:** [George Craciun](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:58:11 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
George Craciun  
gcraciun1@yahoo.com [your location will go here]

**From:** [Jamie Fairchild](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:57:16 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Jamie Fairchild  
[j.c.fairchild@earthlink.net](mailto:j.c.fairchild@earthlink.net) [your location will go here]



**From:** [Lynn Wilbur](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:57:14 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS’ plan (CD-0006-02 ).

Sincerely,  
Lynn Wilbur  
[kalei.lw@gmail.com](mailto:kalei.lw@gmail.com) [your location will go here]

**From:** [Stephanie Kob](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:56:06 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let’s restore our National Seashore

Sincerely,  
Stephanie Kob  
stephanie\_kob@hotmail.com [your location will go here]

**From:** [Katherine Hinson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:51:11 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Katherine Hinson  
[angelfishhinson@aol.com](mailto:angelfishhinson@aol.com) [your location will go here]

**From:** [Donna Gensler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:48:11 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Donna Gensler

**From:** [Scott Species](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:48:07 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Scott Species  
sspecies@yahoo.com [your location will go here]

**From:** [Mike Gross](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:46:08 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

**From:** [robert dowling](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:43:09 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
robert dowling  
juliebob47@verizon.net [your location will go here]

**From:** [robert dowling](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:42:16 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
robert dowling  
[juliebob47@verizon.net](mailto:juliebob47@verizon.net) [your location will go here]



**From:** [Rudy Zeller](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:42:12 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Rudy Zeller  
goforgoalrudy2@yahoo.com [your location will go here]

**From:** [Greg Elems](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:41:12 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Greg Elems  
[gelems@sbcglobal.net](mailto:gelems@sbcglobal.net) [your location will go here]

**From:** ["Maureen O'Neal"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:40:08 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Maureen O'Neal  
[momoneal77@gmail.com](mailto:momoneal77@gmail.com) [your location will go here]

**From:** [kay buhler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:39:08 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
kay buhler  
[secretleash@hotmail.com](mailto:secretleash@hotmail.com) [your location will go here]

**From:** [Sarai Feria](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:34:10 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Sarai Feria  
nemesis\_33012@yahoo.com [your location will go here]

**From:** [Freddy Rohlen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:33:09 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Freddy Rohlen  
[freddyghorses@yahoo.com](mailto:freddyghorses@yahoo.com) [your location will go here]

**From:** [Carl Oerke Jr](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:33:09 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Carl Oerke Jr  
[carl\\_oerke@yahoo.com](mailto:carl_oerke@yahoo.com) [your location will go here]

**From:** [Diane Gentile](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:32:09 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Assuming the NPS’ strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg “The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock “does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate.” The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS’ strategy.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Diane Gentile  
[dianegentile@gmail.com](mailto:dianegentile@gmail.com) [your location will go here]



**From:** [Frances Dunham](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:31:19 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Frances Dunham  
[francesdunham@97520.net](mailto:francesdunham@97520.net) [your location will go here]

**From:** [Gina LoBiondo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:29:08 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Gina LoBiondo  
reggie13chip@yahoo.com [your location will go here]

**From:** ["Cinzia B."](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:28:22 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

California’s highest E.Coli level was recorded on a Point Reyes ranch. Park service’s 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johne's disease, and therefore can't be relocated.  
Commercial operations that harm wildlife do not belong in a public park.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Cinzia B.  
picchina@ymail.com [your location will go here]

**From:** [Krista Dana](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:28:20 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Krista Dana  
k\_puppy@hotmail.com [your location will go here]

**From:** [Reesa St George](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:28:11 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Reesa St George  
[handsomemancat@sbcglobal.net](mailto:handsomemancat@sbcglobal.net) [your location will go here]

**From:** ["Kim O'Connor"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:27:07 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Kim O'Connor  
savage1@shaw.ca [your location will go here]

**From:** [Malva McIntosh](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:26:06 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Malva McIntosh  
malvamcintosh@gmail.com [your location will go here]

**From:** [Jenna Fallaw](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:25:21 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS’ plan.

Sincerely,  
Jenna Fallaw  
[jenna\\_grimm@hotmail.com](mailto:jenna_grimm@hotmail.com) [your location will go here]



**From:** [Andre Yokers](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:25:13 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Andre Yokers  
[jockers.andrew@gmail.com](mailto:jockers.andrew@gmail.com) [your location will go here]

**From:** [Clau Pen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:20:12 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Clau Pen  
[ictftbn28@gmail.com](mailto:ictftbn28@gmail.com) [your location will go here]

**From:** [Linda Bellavia](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:20:07 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Linda Bellavia  
[bellavia1@gmail.com](mailto:bellavia1@gmail.com) [your location will go here]

**From:** [Cindy Page](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:19:26 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Cindy Page  
clpage235@gmail.com [your location will go here]

**From:** [Sarah Lincoln](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:19:22 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Sarah Lincoln  
slincoln556@gmail.com [your location will go here]

**From:** [Deborah Mastrandrea](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:19:08 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Deborah Mastrandrea

**From:** [Paul Kalka](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:17:07 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Kindly act in the best interest of the public good.

Sincerely,  
Paul Kalka  
[pgkzo@yahoo.com](mailto:pgkzo@yahoo.com) [your location will go here]

**From:** [Jan Jones](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:15:11 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Jan Jones  
[jan@metrostation.com](mailto:jan@metrostation.com) [your location will go here]



**From:** [Yazmin Gonzalez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:15:08 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Yazmin Gonzalez  
evaunit2001@yahoo.com [your location will go here]

**From:** [Raymond Arent](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:15:07 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

Please withdraw your conditional approval of the NPS’ plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Raymond Arent  
[rjarent@gmail.com](mailto:rjarent@gmail.com) [your location will go here]

**From:** [Linda E Peveto](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:14:09 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Linda E Peveto

**From:** [Kayla Stephens](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:14:07 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on "best management practices", but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Kayla Stephens  
kstephens755@gmail.com [your location will go here]

**From:** [Margaret Ribeiro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:11:15 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Margaret Ribeiro  
[mribeiro\\_2000@yahoo.com](mailto:mribeiro_2000@yahoo.com) [your location will go here]

**From:** [Tori Freeman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:07:19 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Tori Freeman  
[toridragon@gmail.com](mailto:toridragon@gmail.com) [your location will go here]

**From:** [Lauren Murdock](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:07:15 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Lauren Murdock  
[murdock\\_ls@hotmail.com](mailto:murdock_ls@hotmail.com) [your location will go here]

**From:** [Sarah Kimber](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:07:13 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Sarah Kimber  
sarahkimber123@gmail.com [your location will go here]



**From:** [Dana A Shields](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:04:15 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Dana A Shields  
[danashields@mac.com](mailto:danashields@mac.com) [your location will go here]

**From:** [Mark Feldman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:04:06 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

US Methane emissions from livestock and natural gas are nearly equal.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Mark Feldman  
[happeevegan@gmail.com](mailto:happeevegan@gmail.com) [your location will go here]

**From:** [Dana A Shields](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:03:12 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Dana A Shields  
[danashields@mac.com](mailto:danashields@mac.com) [your location will go here]

**From:** [Karen Intorcio](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:03:07 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (Enterococcus is another large genus of bacteria)."

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,

**From:** [Abigail Howes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 7:01:09 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Abigail Howes  
abigail\_howes@yahoo.com [your location will go here]

**From:** [Karin Rettig](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:58:28 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Karin Rettig  
karinr1@yahoo.com [your location will go here]

**From:** [Carol Stevens](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:58:24 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Carol Stevens  
[animalfreak98037@yahoo.com](mailto:animalfreak98037@yahoo.com) [your location will go here]

**From:** [Susan Heath](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:58:15 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Susan Heath  
forbux@hotmail.com [your location will go here]



**From:** [Nancy McMahon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:58:05 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Nancy McMahon  
[n.mcmahon1@icloud.com](mailto:n.mcmahon1@icloud.com) [your location will go here]

**From:** [Noreen Lassandrello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:57:10 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Please protect the native tule elk from being culled in our National Seashore.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Noreen Lassandrello  
[noreenlas@yahoo.com](mailto:noreenlas@yahoo.com) [your location will go here]

**From:** [Evelyn Coltman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:56:14 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Evelyn Coltman  
[evelyn3226@charter.net](mailto:evelyn3226@charter.net) [your location will go here]

**From:** ["Dr. Theresa Scherf"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:56:11 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Dr. Theresa Scherf  
[theresascherf@gmail.com](mailto:theresascherf@gmail.com) [your location will go here]

**From:** [C M](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:55:08 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
C M  
[smillnace@yahoo.com](mailto:smillnace@yahoo.com) [your location will go here]

**From:** [Susan Foley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:53:09 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Susan Foley  
susietwin001@aol.com [your location will go here]

**From:** [Shakayla Thomas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:52:06 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Shakayla Thomas  
tshakayla88@yahoo.com [your location will go here]

**From:** [Karen Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:49:14 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Karen Anderson  
keanderson17@gmail.com [your location will go here]



**From:** [James Stanton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:49:10 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
James Stanton  
[jim33458@gmail.com](mailto:jim33458@gmail.com) [your location will go here]

**From:** [K Krupinski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:49:07 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
K Krupinski  
[kkbluerose@hotmail.com](mailto:kkbluerose@hotmail.com) [your location will go here]

**From:** [Radhika Srinivasan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:47:07 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Radhika Srinivasan  
[rsforplanetearth@gmail.com](mailto:rsforplanetearth@gmail.com) [your location will go here]

**From:** [jesse williams](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:46:15 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
jesse williams  
[arqwing@yahoo.com](mailto:arqwing@yahoo.com) [your location will go here]

**From:** [Crystal Rector](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:45:17 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Crystal Rector  
wispycrys@yahoo.com [your location will go here]

**From:** [Ellen Franzen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:42:18 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary. and caution that these approaches are greenwashing attempts, like "Clean Coal."

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Ellen Franzen  
[ellen\\_franzen@yahoo.co](mailto:ellen_franzen@yahoo.co) [your location will go here]

**From:** [Carol Chappell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:42:15 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Carol Chappell  
ccngbrazil@hughes.net [your location will go here]

**From:** ["Lisa Kipen-Hershenson"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:41:16 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

US Methane emissions from livestock and natural gas are nearly equal.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS’ plan.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public’s vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don’t miss this opportunity. Do what’s right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Lisa Kipen-Hershenson  
futurecantor@gmail.com [your location will go here]



**From:** [Bobbi Lempert](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:41:09 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Bobbi Lempert  
[earthchild4ever@yahoo.com](mailto:earthchild4ever@yahoo.com) [your location will go here]

**From:** [Barbara Whyman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:38:17 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Barbara Whyman  
[b.whyman@yahoo.com](mailto:b.whyman@yahoo.com) [your location will go here]

**From:** [renee vesely](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:37:07 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS’ plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Kindly act in the best interest of the public good.

Sincerely,  
renee vesely  
renpenny@hotmail.com [your location will go here]

**From:** [Maureen Porcelli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:36:19 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Maureen Porcelli  
[am.curious.sometimes@gmail.com](mailto:am.curious.sometimes@gmail.com) [your location will go here]

**From:** [Maureen Porcelli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:36:13 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Maureen Porcelli  
[am.curious.sometimes@gmail.com](mailto:am.curious.sometimes@gmail.com) [your location will go here]

**From:** ["Saran K."](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:36:05 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Saran K.  
sarank@mac.com [your location will go here]

**From:** [Francie Salle](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:34:12 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Francie Salle  
fgsalle@gmail.com [your location will go here]

**From:** [Shani Schulman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:33:11 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like “Clean Coal.”

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Shani Schulman  
HvnlyAngel777@hotmail.com [your location will go here]



**From:** [Michelle Palladine](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:32:12 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Michelle Palladine  
[mpalladine@earthlink.net](mailto:mpalladine@earthlink.net) [your location will go here]

**From:** ["A. Mervyn & Marilyn Carse"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:30:30 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
A. Mervyn & Marilyn Carse  
[mlcarse@yahoo.com](mailto:mlcarse@yahoo.com) [your location will go here]

**From:** [Patricia Browne](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:30:21 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

"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."

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Patricia Browne  
[patricia.browne@gmail.com](mailto:patricia.browne@gmail.com) [your location will go here]

**From:** [JEDD PARKER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:30:20 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
JEDD PARKER  
jeddparker@yahoo.com [your location will go here]

**From:** [Amalia Lelo de Larrea](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:29:21 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Amalia Lelo de Larrea  
[larlezam@yahoo.com.mx](mailto:larlezam@yahoo.com.mx) [your location will go here]

**From:** [c abbot](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:29:13 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
c abbot  
[caabco@att.net](mailto:caabco@att.net) [your location will go here]

**From:** [Derek Gendvil](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:29:08 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Derek Gendvil  
dgendvil@gmail.com [your location will go here]

**From:** [Pat Copenhaver](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:28:10 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

The Park Service’s own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there’s not much else that can be gained beyond what’s been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Pat Copenhaver  
[patcope@ymail.com](mailto:patcope@ymail.com) [your location will go here]



**From:** [Pat Copenhaver](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:27:08 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on "best management practices", but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Pat Copenhaver

**From:** [Leo Kucewicz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:23:11 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Leo Kucewicz  
j14lion@gmail.com [your location will go here]

**From:** [Margaret Silver](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:20:20 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Margaret Silver  
[cattleya@comcast.net](mailto:cattleya@comcast.net) [your location will go here]

**From:** [James Gifford](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:20:19 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
James Gifford  
jdg1102@gmail.com [your location will go here]

**From:** [Ron Silver](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:20:14 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are "technically or financially infeasible" and "in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS"

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary.and caution that these approaches are greenwashing attempts, like "Clean Coal."

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Ron Silver  
rhinopias@comcast.net [your location will go here]

**From:** [Waltraud Buckland](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:17:13 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Waltraud Buckland  
[avenidacats@gmail.com](mailto:avenidacats@gmail.com) [your location will go here]

**From:** [Jan Bird](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:17:08 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Jan Bird  
bird\_house1965@yahoo.com [your location will go here]

**From:** [Flash Rosenberg](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:17:07 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Flash Rosenberg  
flashberg@gmail.com [your location will go here]



**From:** [KENDRA WILSON](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:15:16 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

“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.”

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public’s vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don’t miss this opportunity. Do what’s right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
KENDRA WILSON  
[kendracw@yahoo.com](mailto:kendracw@yahoo.com) [your location will go here]

**From:** [Allison Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:15:07 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Allison Anderson  
alliesw@yahoo.com [your location will go here]

**From:** [Kellie Smith](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:14:09 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. “Carbon farms” are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a ‘management threshold.’ Please note there is no science behind the NPS’ number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS’ and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS’ plan, and find the plan not consistent.

Sincerely,  
Kellie Smith  
kelf.nh@live.com [your location will go here]

**From:** [Shelley Cerasaro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:14:08 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Kindly act in the best interest of the public good.

Sincerely,  
Shelley Cerasaro  
geyser89@gmail.com [your location will go here]

**From:** [Carly Clements Owens](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:11:15 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Carly Clements Owens

**From:** [Paula Morgan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:10:12 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Paula Morgan  
[paulaymorgan@gmail.com](mailto:paulaymorgan@gmail.com) [your location will go here]

**From:** [John Burridge](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:09:14 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
John Burridge  
[burridge@cox.net](mailto:burridge@cox.net) [your location will go here]

**From:** [Tarzan Mangili](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:09:10 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Tarzan Mangili  
[matttman898@yahoo.com](mailto:matttman898@yahoo.com) [your location will go here]



**From:** [joyce kolasa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:08:22 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
joyce kolasa  
[petsheaven4@gmail.com](mailto:petsheaven4@gmail.com) [your location will go here]

**From:** [James Cronin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:08:12 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
James Cronin  
jjcro2112@hotmail.com [your location will go here]

**From:** [David Sawcer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:08:08 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
David Sawcer  
fifeeliz1@hotmail.com [your location will go here]

**From:** [Diane Marcotte](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:08:07 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS’ plan.

Sincerely,  
Diane Marcotte  
didee1000@hotmail.com [your location will go here]

**From:** [Steve Aydelott](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:07:14 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Steve Aydelott  
[staydelott@hotmail.com](mailto:staydelott@hotmail.com) [your location will go here]

**From:** [Kay Fife](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:07:06 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Kay Fife  
fife@hotmail.com [your location will go here]

**From:** [Carol Sears](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:06:13 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Carol Sears  
Carolctcl1@comcast.net [your location will go here]

**From:** [Elizabeth Fife](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:06:08 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.



**From:** ["Laura D."](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:05:11 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Laura D.  
laura\_dehaven@yahoo.com [your location will go here]

**From:** [leslie klein](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:05:08 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
leslie klein  
kleinleslie@yahoo.com [your location will go here]

**From:** [Mason Griffith](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:04:07 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Mason Griffith  
magbaron@msn.com [your location will go here]

**From:** [Margaret Walden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:03:22 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Margaret Walden  
catslave3m@netscape.net [your location will go here]

**From:** [Rosamund Downing](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:03:19 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Please protect the native tule elk from being culled in our National Seashore.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Rosamund Downing  
rozdown@hotmail.com [your location will go here]

**From:** [Stephan Donovan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:03:13 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Stephan Donovan  
[stephandonovan@aol.com](mailto:stephandonovan@aol.com) [your location will go here]

**From:** [Barbara Becker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:03:07 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Barbara Becker  
duckie3x@aol.com [your location will go here]

**From:** [roth woods](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:01:14 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
roth woods  
[roth.woods@emich.edu](mailto:roth.woods@emich.edu) [your location will go here]



**From:** [Chris Guillory](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:01:11 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Chris Guillory  
[chris\\_no51@yahoo.com](mailto:chris_no51@yahoo.com) [your location will go here]

**From:** [Sandra Holland](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 6:00:13 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Sandra Holland  
skayh63@hotmail.com [your location will go here]

**From:** [Heather Cross](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:58:07 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Heather Cross  
trashwoman@hotmail.com [your location will go here]

**From:** [Chris Bowman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:57:20 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Chris Bowman  
bowmanphoto1990@gmail.com [your location will go here]

**From:** [Andy Lynn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:57:08 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

**From:** [Teri Sigler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:55:14 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Teri Sigler  
[siglert@ucsc.edu](mailto:siglert@ucsc.edu) [your location will go here]

**From:** [Soumya Naidu](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:54:26 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Soumya Naidu  
[soumya70@yahoo.com](mailto:soumya70@yahoo.com) [your location will go here]

**From:** [Mackenzie Evans](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:54:18 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Mackenzie Evans  
[mackenziegraceevans@gmail.com](mailto:mackenziegraceevans@gmail.com) [your location will go here]



**From:** [Ruth Boice](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:54:12 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Ruth Boice  
rlboice2@yahoo.com [your location will go here]

**From:** [Nandita Shah](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:53:12 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Nandita Shah  
[shahnandi@gmail.com](mailto:shahnandi@gmail.com) [your location will go here]

**From:** [christine wisniewski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:53:09 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

"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."

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
christine wisniewski  
c.wish@att.net [your location will go here]

**From:** [audrey chun](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:52:13 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
audrey chun  
shopgr8@yahoo.com [your location will go here]

**From:** [Pamela Wood](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:52:11 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Pamela Wood  
pwood1827@gmail.com [your location will go here]

**From:** [Kathleen Kaiser](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:51:08 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Kathleen Kaiser  
eiderdown1@gmail.com [your location will go here]

**From:** [vana spear](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:49:19 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

**From:** [Sandra Walker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:47:12 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Sandra Walker  
defy7746@gmail.com [your location will go here]



**From:** ["Hank Ramírez"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:46:12 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Kindly act in the best interest of the public good.

Sincerely,  
Hank Ramírez  
[latinleo@sbcglobal.net](mailto:latinleo@sbcglobal.net) [your location will go here]

**From:** [Richard Barker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:46:06 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Richard Barker  
[rbarker@asu.edu](mailto:rbarker@asu.edu) [your location will go here]

**From:** [Sandi Aden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:45:19 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull

our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Sandi Aden  
ibshrt@aol.com [your location will go here]

**From:** [Blake Wu](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:45:16 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The NPS’ Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Blake Wu  
skbkms@mail.com [your location will go here]

**From:** [Dianne Douglas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:45:11 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Dianne Douglas  
[ddouglas@mainex1.asu.edu](mailto:ddouglas@mainex1.asu.edu) [your location will go here]

**From:** [Gail MacMillan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:44:22 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Gail MacMillan  
[gailmacmillan@sbcglobal.net](mailto:gailmacmillan@sbcglobal.net) [your location will go here]

**From:** [Sherrill Futrell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:44:20 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Sherrill Futrell



**From:** [Susan Campbell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:44:16 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Susan Campbell  
[susancfp@msn.com](mailto:susancfp@msn.com) [your location will go here]

**From:** [Maryellen Redish](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:44:12 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Maryellen Redish  
[mredish@aol.com](mailto:mredish@aol.com) [your location will go here]

**From:** [Marie Elaina Rago](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:42:16 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Marie Elaina Rago

**From:** [Lynne Holt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:42:13 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Lynne Holt  
[holtlynn@hotmail.com](mailto:holtlynn@hotmail.com) [your location will go here]

**From:** [Cindy Risvold](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:42:12 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Cindy Risvold  
[cindyrisvold@uwalumni.com](mailto:cindyrisvold@uwalumni.com) [your location will go here]

**From:** [Colleen Lobel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:42:10 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

The CCC should not approve of a Climate Action Strategy from the NPS that can’t prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Colleen Lobel  
[clobell@san.rr.com](mailto:clobell@san.rr.com) [your location will go here]

**From:** [Robyn Deveney](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:41:12 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Robyn Deveney  
wheelercamps@gmail.com [your location will go here]

**From:** [Regan Ebert](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:41:06 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Regan Ebert  
[reganebert@yahoo.com](mailto:reganebert@yahoo.com) [your location will go here]



**From:** [MArgaret Vernon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:39:18 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
MArgaret Vernon  
vernon.margaret0@gmail.com [your location will go here]

**From:** [Phillip Hope](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:39:12 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

**From:** [Nancy Thelot](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:37:15 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Nancy Thelot  
nthelott@excite.com [your location will go here]

**From:** [Nancy Thelot](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:37:12 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Nancy Thelot  
[thelotn@yahoo.com](mailto:thelotn@yahoo.com) [your location will go here]

**From:** [judy pizarro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:37:09 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
judy pizarro  
jxp411@yahoo.com [your location will go here]

**From:** [Jo Harvey](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:37:07 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

“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.”

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8’ fence. In addition, the NPS’ plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Jo Harvey  
[cailinfili@yahoo.com](mailto:cailinfili@yahoo.com) [your location will go here]

**From:** [Tajeer Robinson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:36:11 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS’ plan

Sincerely,  
Tajeer Robinson  
[tajerrobinson@yahoo.com](mailto:tajerrobinson@yahoo.com) [your location will go here]

**From:** [chuck levin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:35:18 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Please protect the native tule elk from being culled in our National Seashore.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
chuck levin  
[chucklevin81@gmail.com](mailto:chucklevin81@gmail.com) [your location will go here]



**From:** [C Grimes](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:35:08 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
C Grimes  
[nckittenbird@aol.com](mailto:nckittenbird@aol.com) [your location will go here]

**From:** [Christine Lininger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:34:12 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [William Foreman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:34:10 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
William Foreman  
WilliamForeman91@yahoo.com [your location will go here]

**From:** [Robert Wisniewski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:32:19 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Robert Wisniewski  
[bobwiz@comcast.net](mailto:bobwiz@comcast.net) [your location will go here]

**From:** [Tina Zenko](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:31:10 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Tina Zenko  
zenkali2@yahoo.com [your location will go here]

**From:** [Lacey Hicks](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:30:17 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The NPS’ plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Lacey Hicks  
laceyhicks@hotmail.com [your location will go here]

**From:** [Denise Lenardson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:30:16 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Denise Lenardson  
[tupper.ladie@gmail.com](mailto:tupper.ladie@gmail.com) [your location will go here]

**From:** [Craig Zimmerman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:30:14 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Cows produce 150 billion gallons of methane per day.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Craig Zimmerman  
dragonfly6160@yahoo.com [your location will go here]



**From:** [Joanne Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:30:10 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS’ plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Joanne Anderson  
[joannea\\_94583@yahoo.com](mailto:joannea_94583@yahoo.com) [your location will go here]

**From:** [Anne Hamre](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:29:12 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Anne Hamre  
fledermaus23@hotmail.com [your location will go here]

**From:** [Dori Cole](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:29:09 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Dori Cole  
dpernicka@yahoo.com [your location will go here]

**From:** [Helen Schafer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:28:12 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Helen Schafer  
bill.helen@outlook.com [your location will go here]

**From:** [Rita Lemkuil](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:28:07 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Rita Lemkuil  
chick669@gmail.com [your location will go here]

**From:** [Rosemary Richards](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:27:14 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,

**From:** [Steve Prince](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:27:11 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Cows produce 150 billion gallons of methane per day.

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Steve Prince  
cands78@comcast.net [your location will go here]

**From:** [Annamaria Laverty](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:26:15 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Annamaria Laverty  
[annamaria621@comcast.net](mailto:annamaria621@comcast.net) [your location will go here]



**From:** [Jami Dougan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:26:11 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

California’s highest E.Coli level was recorded on a Point Reyes ranch. Park service’s 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn’t just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn’t remove the cows from Pt. Reyes.

I urge the Commission to not support the NPS’ plan to cull native Tule elk in PRNS.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Jami Dougan  
[jami.dougan@gmail.com](mailto:jami.dougan@gmail.com) [your location will go here]

**From:** [Jeanine Weber](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:25:17 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

"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."

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Jeanine Weber  
weberjea@aquinas.edu [your location will go here]

**From:** [Dawn Hendry](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:25:09 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

Please protect the native tule elk from being culled in our National Seashore.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Dawn Hendry  
[dawnjeanine62@gmail.com](mailto:dawnjeanine62@gmail.com) [your location will go here]

**From:** [Peter Ayres](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:25:07 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Peter Ayres  
[peter\\_ys@yahoo.com](mailto:peter_ys@yahoo.com) [your location will go here]

**From:** [Dawn Hendry](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:24:13 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Dawn Hendry  
[dawnjeanine62@gmail.com](mailto:dawnjeanine62@gmail.com) [your location will go here]

**From:** [David Stear](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:24:08 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Cows produce 150 billion gallons of methane per day.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
David Stear  
cinema21@cox.net [your location will go here]

**From:** [Frances Mackiewicz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:23:12 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Frances Mackiewicz  
fmackiewic@msn.com [your location will go here]

**From:** [Janet Ginepro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:21:16 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Janet Ginepro  
[janet9cats@gmail.com](mailto:janet9cats@gmail.com) [your location will go here]



**From:** [Lynn Costa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:21:11 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Lynn Costa  
[ldgcosta@gmail.com](mailto:ldgcosta@gmail.com) [your location will go here]

**From:** [Robert Ferrara](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:21:08 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS’ plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS’ plan.

Sincerely,  
Robert Ferrara  
hando1964@msn.com [your location will go here]

**From:** [Michael Braude](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:20:14 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Michael Braude  
mabraude@aol.com [your location will go here]

**From:** [Melissa Polick](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:19:05 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Melissa Polick  
mpolick415@icloud.com [your location will go here]

**From:** [D Garratt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:18:11 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
D Garratt  
erpelding@excite.com [your location will go here]

**From:** ["Liz Erpelding-Garratt"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:18:07 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Liz Erpelding-Garratt  
[erpeldinggarratt@gmail.com](mailto:erpeldinggarratt@gmail.com) [your location will go here]

**From:** [Jean Le Marquand](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:17:06 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Jean Le Marquand  
[jeanlemarquand@yahoo.ca](mailto:jeanlemarquand@yahoo.ca) [your location will go here]

**From:** [Colleen K](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:14:13 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Colleen K  
dudette53147@yahoo.com [your location will go here]



**From:** [Colleen K](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:14:09 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Colleen K  
dudette53147@yahoo.com [your location will go here]

**From:** [Robyn Reichert](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:12:14 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Robyn Reichert  
[scooteacha@aol.com](mailto:scooteacha@aol.com) [your location will go here]

**From:** [Linda Fighera](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:11:21 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Linda Fighera  
teddylucylinda@yahoo.com [your location will go here]

**From:** [Marie Dickenson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:11:16 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne’s disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS’ plan

Sincerely,  
Marie Dickenson  
derekd64@verizon.net [your location will go here]

**From:** [Barbara Harper](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:11:13 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Barbara Harper

**From:** [Eric Edwards](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:09:24 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Eric Edwards  
eequinness@hotmail.com [your location will go here]

**From:** [Richard Spotts](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:09:16 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

The NPS is being sued because the NPS’ Plan is violating the NPS’ own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS’ plan inconsistent with the Coastal Act.

Sincerely,  
Richard Spotts  
raspotts2@gmail.com [your location will go here]

**From:** [Sharen Oxman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:09:09 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Sharen Oxman  
[shack694@gmail.com](mailto:shack694@gmail.com) [your location will go here]



**From:** [lin hemme](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:07:10 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Cows produce 150 billion gallons of methane per day.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
lin hemme  
stepquiet@yahoo.com [your location will go here]

**From:** [Susan Dannelly](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:07:07 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Susan Dannelly  
sd92748@aol.com [your location will go here]

**From:** [ALISON DICE](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:06:05 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
ALISON DICE  
ALI-CAT902@HOTMAIL.COM [your location will go here]

**From:** [Ray Martinez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:05:08 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

"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."

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Ray Martinez  
rayzpitbulls@msn.com [your location will go here]

**From:** [Tharukee Amaya](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:04:12 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Tharukee Amaya  
[amayatharukee7@gmail.com](mailto:amayatharukee7@gmail.com) [your location will go here]

**From:** ["Mrs. P. D. Waterworth"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:04:09 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don’t even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public’s vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don’t miss this opportunity. Do what’s right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Mrs. P. D. Waterworth  
[pdwaterworth@gmail.com](mailto:pdwaterworth@gmail.com) [your location will go here]

**From:** [Bernadette Belcastro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 5:03:09 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Bernadette Belcastro  
bell20@hotmail.com [your location will go here]

**From:** [Ellen Homsey](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:59:10 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Ellen Homsey  
[ehomsey@yahoo.com](mailto:ehomsey@yahoo.com) [your location will go here]



**From:** [Carol Thornton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:58:21 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Carol Thornton  
carolt@lmi.net [your location will go here]

**From:** [Sara Gernsbacher](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:58:08 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Sara Gernsbacher  
sgernsbacher@gmail.com [your location will go here]

**From:** [Bronwen Evans](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:55:17 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Bronwen Evans

**From:** [Dawn Cumings](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:55:11 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Please protect the native tule elk from being culled in our National Seashore.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Dawn Cumings  
dmcumings@hotmail.com [your location will go here]

**From:** ["Susan O'Rourke"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:54:10 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Susan O'Rourke  
[Susanoraaurke56@yahoo.com](mailto:Susanoraaurke56@yahoo.com) [your location will go here]

**From:** [Janet Robinson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:54:07 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Janet Robinson  
[bocacatlover@gmail.com](mailto:bocacatlover@gmail.com) [your location will go here]

**From:** [Alan Wojtalik](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:51:16 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Alan Wojtalik  
[alan\\_wojtalik@hotmail.com](mailto:alan_wojtalik@hotmail.com) [your location will go here]

**From:** [Missy Kendrick](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:50:28 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Missy Kendrick  
[missykendrick@msn.com](mailto:missykendrick@msn.com) [your location will go here]



**From:** [Thomas Boswell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:50:24 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Thomas Boswell  
[thomcms@juno.com](mailto:thomcms@juno.com) [your location will go here]

**From:** [Deepa Gopal](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:49:11 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Deepa Gopal  
[deepajee@yahoo.com](mailto:deepajee@yahoo.com) [your location will go here]

**From:** [Kenneth Green](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:49:10 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [Rachel Wolf](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:48:25 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Rachel Wolf  
[therachelswoof@gmail.com](mailto:therachelswoof@gmail.com) [your location will go here]

**From:** [John Rhoades](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:48:20 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
John Rhoades  
[jr@rhoadesinc.com](mailto:jr@rhoadesinc.com) [your location will go here]

**From:** [Laura Campbell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:48:08 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Laura Campbell  
campbell4747sd@gmail.com [your location will go here]

**From:** [Kenneth Green](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:47:16 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Kenneth Green  
jascaain@aol.com [your location will go here]

**From:** [Devin Royer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:47:10 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Devin Royer  
[contact@devinroyer.com](mailto:contact@devinroyer.com) [your location will go here]



**From:** [Liz Field](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:47:08 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

“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.”

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS’ plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Liz Field  
ejefield16@comcast.net [your location will go here]

**From:** [karen kindel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:45:26 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
karen kindel  
k.kindel@att.net [your location will go here]

**From:** [Dean Halpern](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:45:17 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Dean Halpern  
[donotdisturb@gmail.com](mailto:donotdisturb@gmail.com) [your location will go here]

**From:** [Claudia Bowman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:45:12 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Claudia Bowman  
[claudiabow@gmail.com](mailto:claudiabow@gmail.com) [your location will go here]

**From:** [Selim Uzuner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:45:08 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Selim Uzuner  
[uzunerselim@hotmail.com](mailto:uzunerselim@hotmail.com) [your location will go here]

**From:** ["Emily Dickinson-Adams"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:44:11 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Emily Dickinson-Adams  
emmytwin2@cox.net [your location will go here]

**From:** [Hilarie Ericson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:44:10 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Hilarie Ericson  
[hilariee@hotmail.com](mailto:hilariee@hotmail.com) [your location will go here]

**From:** [Dominique Hecker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:43:20 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are "technically or financially infeasible" and "in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS"

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Dominique Hecker  
[alpinelake42@gmail.com](mailto:alpinelake42@gmail.com) [your location will go here]



**From:** [Dean Halpern](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:41:12 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary. and caution that these approaches are greenwashing attempts, like "Clean Coal."

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

**From:** [Anne Kobayashi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:40:22 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Anne Kobayashi  
[annekobayashi@yahoo.com](mailto:annekobayashi@yahoo.com) [your location will go here]

**From:** [patricia perron](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:40:15 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
patricia perron  
[patriciaperron@hotmail.com](mailto:patriciaperron@hotmail.com) [your location will go here]

**From:** [Edward Rengers](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:37:11 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Edward Rengers  
[edreng@gmail.com](mailto:edreng@gmail.com) [your location will go here]

**From:** [Karen Berger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:37:09 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

**From:** [Brandie Deal](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:35:16 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS’ plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS’ plan.

Sincerely,  
Brandie Deal  
laughsalot0579@yahoo.com [your location will go here]

**From:** [Grace Gutierrez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:34:33 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Grace Gutierrez  
kittyoliver@yahoo.com [your location will go here]

**From:** [Kelly Riley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:34:31 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Kelly Riley  
khanlon74@yahoo.com [your location will go here]



**From:** [CARL LUHRING](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:33:14 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Please protect the native tule elk from being culled in our National Seashore.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
CARL LUHRING  
carlluhring@hotmail.com [your location will go here]

**From:** [Paula Cano](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:33:11 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

“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.”

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Paula Cano  
armalapeluca@gmail.com [your location will go here]

**From:** [Bill Both](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:33:07 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Bill Both  
saulpaulus@aol.com [your location will go here]

**From:** [Carol Fletcher](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:32:08 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Carol Fletcher  
cefletch@umich.edu [your location will go here]

**From:** [Desiree Nagyfy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:31:13 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Desiree Nagyfy  
[dnagyfy@msn.com](mailto:dnagyfy@msn.com) [your location will go here]

**From:** [Mia Moss](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:30:18 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Cows produce 150 billion gallons of methane per day.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Mia Moss  
[miabmoss@gmail.com](mailto:miabmoss@gmail.com) [your location will go here]

**From:** [Cindy Moczarney](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:30:14 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Cindy Moczarney  
[cmoczarney@op97.org](mailto:cmoczarney@op97.org) [your location will go here]

**From:** [Linda Black](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:29:15 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Linda Black  
swsmsca@gmail.com [your location will go here]



**From:** [Jennifer Brooks](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:29:13 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on "best management practices", but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Jennifer Brooks  
[jenannebrooks@yahoo.com](mailto:jenannebrooks@yahoo.com) [your location will go here]

**From:** [Francine Lipka](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:29:08 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Francine Lipka  
[fran1253@yahoo.com](mailto:fran1253@yahoo.com) [your location will go here]

**From:** [Neal Steiner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:28:23 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,

**From:** [Michael Rosa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:28:20 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Michael Rosa  
[michaelrosa1999@yahoo.com](mailto:michaelrosa1999@yahoo.com) [your location will go here]

**From:** [Wallace Rhine](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:28:19 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore’s GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an ‘off-set’.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Wallace Rhine  
fafner@bftb.net [your location will go here]

**From:** [Nicole Heslip](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:28:16 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Cows produce 150 billion gallons of methane per day.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Nicole Heslip  
[nicolerheslip@gmail.com](mailto:nicolerheslip@gmail.com) [your location will go here]

**From:** [Ro Vansrien](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:28:09 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8’ fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS’ plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS’ plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

The impacts of ranching in PRNS is well documented in the NPS’ own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Ro Vansrien  
zvan030@gmail.com [your location will go here]

**From:** [Sandra Dal Cais](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:26:09 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Sandra Dal Cais  
[plutonique@aol.com](mailto:plutonique@aol.com) [your location will go here]



**From:** [brigitte Tawa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:25:12 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extends and expands the destructive cattle operations in PRNS.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term ‘clean coal’ used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Please protect the native tule elk from being culled in our National Seashore.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
brigitte Tawa  
cbtawa@yahoo.com [your location will go here]

**From:** [Nora Coyle](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:24:10 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Nora Coyle  
[lcs89@yahoo.com](mailto:lcs89@yahoo.com) [your location will go here]

**From:** [Nora Coyle](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:24:06 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Nora Coyle  
lcs89@yahoo.com [your location will go here]

**From:** [Nora Coyle](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:23:17 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Nora Coyle  
[lcs89@yahoo.com](mailto:lcs89@yahoo.com) [your location will go here]

**From:** [Nora Coyle](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:23:09 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Nora Coyle  
lcs89@yahoo.com [your location will go here]

**From:** [kirk francis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:22:14 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
kirk francis  
luddite33dirk@aol.com [your location will go here]

**From:** [Glen Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:20:17 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

It’s disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future “potential” water quality improvements. This “see no evil” attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS’ plan (CD-0006-02)

Sincerely,  
Glen Anderson  
[glenanderson@integra.net](mailto:glenanderson@integra.net) [your location will go here]

**From:** [Lia Wilbourn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:20:08 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Lia Wilbourn  
[liawilbourn@gmail.com](mailto:liawilbourn@gmail.com) [your location will go here]



**From:** [Teresa Audesirk](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:18:18 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Teresa Audesirk  
terry.audesirk@gmail.com [your location will go here]

**From:** [Steven Vollibs](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:18:09 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Steven Vollibs  
charity089@icloud.com [your location will go here]

**From:** [Marie Wakefield](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:18:07 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Marie Wakefield  
wakefieldm\_2000@yahoo.com [your location will go here]

**From:** [Takako Ishii kiefer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:17:21 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Takako Ishii kiefer  
[takiishii@hotmail.com](mailto:takiishii@hotmail.com) [your location will go here]

**From:** [Julie Beer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:17:07 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Julie Beer  
[rutledge@yahoocom](mailto:rutledge@yahoocom) [your location will go here]

**From:** [Sheila Kelley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:16:15 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Sheila Kelley  
[chiapparussell@yahoo.com](mailto:chiapparussell@yahoo.com) [your location will go here]

**From:** [Zach Ferrara](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:16:09 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

US Methane emissions from livestock and natural gas are nearly equal.

The NPS’ plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Zach Ferrara  
[zachferrara@gmail.com](mailto:zachferrara@gmail.com) [your location will go here]

**From:** [Zach Ferrara](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:15:10 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will



of the ranching tenants.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Zach Ferrara  
zachferrara@gmail.com [your location will go here]

**From:** [Ian Shelley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:14:12 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Ian Shelley  
[ianjs@comcast.net](mailto:ianjs@comcast.net) [your location will go here]

**From:** [Rob Roberto](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:14:12 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Rob Roberto  
[kingpatsfan@hotmail.com](mailto:kingpatsfan@hotmail.com) [your location will go here]

**From:** [Michael Lerner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:12:09 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Kindly act in the best interest of the public good.

Sincerely,  
Michael Lerner  
michael.lerner.9@gmail.com [your location will go here]

**From:** [Alice Jena](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:11:19 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Alice Jena  
petlover1948@hotmail.com [your location will go here]

**From:** [marilyn evenson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:11:13 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
marilyn evenson  
mevenson311@gmail.com [your location will go here]

**From:** [Sally Hinshaw](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:11:11 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Sally Hinshaw  
[sphinshaw@twc.com](mailto:sphinshaw@twc.com) [your location will go here]

**From:** [Reetta Raag](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:10:16 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Reetta Raag  
[rraag@sbcglobal.net](mailto:rraag@sbcglobal.net) [your location will go here]



**From:** [Gary F Gilardi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:10:15 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Gary F Gilardi  
[gary.gilardi@gmail.com](mailto:gary.gilardi@gmail.com) [your location will go here]

**From:** [Liz Sanders](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:10:06 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Liz Sanders  
[lsanders@benedictmetals.com](mailto:lsanders@benedictmetals.com) [your location will go here]

**From:** [Elizabeth Jache](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:09:06 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Elizabeth Jache  
quinsy\_balky\_0r@icloud.com [your location will go here]

**From:** [Elizabeth Jache](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:08:21 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Elizabeth Jache  
quinsy\_balky\_0r@icloud.com [your location will go here]

**From:** [Diane Soddy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:08:19 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Diane Soddy  
fsoddy@frontier.com [your location will go here]

**From:** [Lou Judson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:08:09 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium Escherichia coli (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (Enterococcus is another large genus of bacteria)."

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

**From:** [allie palmer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:07:15 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

The CCC should not approve of a Climate Action Strategy from the NPS that can’t prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Kindly act in the best interest of the public good.

Sincerely,  
allie palmer  
[allie@pjhm.com](mailto:allie@pjhm.com) [your location will go here]

**From:** [El Pe](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:07:09 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8’ fence. In addition, the NPS’ plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
El Pe  
liz1952@gmail.com [your location will go here]



**From:** [M Lopez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:07:06 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

**From:** [Ann DeBolt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:04:10 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Ann DeBolt  
[annmdebolt@gmail.com](mailto:annmdebolt@gmail.com) [your location will go here]

**From:** [Suzanne Connors](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:04:06 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Suzanne Connors  
seraphinmassage@gmail.com [your location will go here]

**From:** ["Ruth Ann Wiesenthal-Gold"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:03:12 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

"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."

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Ruth Ann Wiesenthal-Gold  
[ruthann@woodlandscoalition.com](mailto:ruthann@woodlandscoalition.com) [your location will go here]

**From:** [Robert Blumenthal](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:03:09 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Robert Blumenthal  
[rblument@comcast.net](mailto:rblument@comcast.net) [your location will go here]

**From:** [An Feig](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:02:16 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
An Feig  
aafeig57@gmail.com [your location will go here]

**From:** [Rita Jaros](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:02:10 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

US Methane emissions from livestock and natural gas are nearly equal.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Rita Jaros  
[wesrita@comcast.net](mailto:wesrita@comcast.net) [your location will go here]

**From:** [Susan Fischer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 4:00:17 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

“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.”

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS’ plan. The impacts of ranching in PRNS is well documented in the NPS’ own EIS - ranching must end in PRNS.

Sincerely,  
Susan Fischer  
sue\_rd\_badger@yahoo.com [your location will go here]



**From:** [Jodi Rodar](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:59:14 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

“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.”

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Jodi Rodar  
[hooppole@gmail.com](mailto:hooppole@gmail.com) [your location will go here]

**From:** [Mary Dickson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:59:11 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significantly polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like “Clean Coal.”

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS’s extensive past history, the Commission can expect more of the same. It’s important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Mary Dickson  
topaz913@yahoo.com [your location will go here]

**From:** [nathan schaefer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:59:07 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated "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..." (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

"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."

Please protect the native tule elk from being culled in our National Seashore.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
nathan schaefer  
natgumpa@yahoo.com [your location will go here]

**From:** [Carrie Swank](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:58:14 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Carrie Swank  
[caswank1@gmail.com](mailto:caswank1@gmail.com) [your location will go here]

**From:** [Jennifer Lessard](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:58:11 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Jennifer Lessard  
[lessardjennifer@hotmail.com](mailto:lessardjennifer@hotmail.com) [your location will go here]

**From:** [Tracey Bonner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:58:10 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Tracey Bonner  
tlb8@yahoo.com [your location will go here]

**From:** [Eleanor Navarro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:58:07 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public’s vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don’t miss this opportunity. Do what’s right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Eleanor Navarro  
msmackey2001@yahoo.com [your location will go here]

**From:** [Joyce Overton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:57:06 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Joyce Overton  
doverton19@verizon.net [your location will go here]



**From:** [Patricia Dangle](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:56:30 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Cows produce 150 billion gallons of methane per day.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Patricia Dangle  
dangle162@comcast.net [your location will go here]

**From:** [Kimberly Short](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:56:24 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Kimberly Short  
kshort60957@gmail.com [your location will go here]

**From:** [Bernadette Andoloro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:56:24 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Bernadette Andoloro  
[bandaloro2020@gmail.com](mailto:bandaloro2020@gmail.com) [your location will go here]

**From:** [Cristy Murray](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:55:10 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

"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."

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Cristy Murray  
[doglady8@gmail.com](mailto:doglady8@gmail.com) [your location will go here]

**From:** [Priscilla Martinez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:53:09 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Priscilla Martinez  
[priscillamartinez486@yahoo.com](mailto:priscillamartinez486@yahoo.com) [your location will go here]

**From:** [Alan P Socol](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:52:20 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Alan P Socol  
[alanpsocol@yahoo.com](mailto:alanpsocol@yahoo.com) [your location will go here]

**From:** [Rene Voss](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:52:06 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Rene Voss  
[renepvoss@gmail.com](mailto:renepvoss@gmail.com) [your location will go here]

**From:** ["Cindy M. Dutka"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:51:15 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Cindy M. Dutka  
mdmsass@aol.com [your location will go here]



**From:** [Maggie Topalian](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:51:12 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

The CCC should not approve of a Climate Action Strategy from the NPS that can’t prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS’ plan (CD-0006-02)

Sincerely,  
Maggie Topalian  
mtopalian.7@gmail.com [your location will go here]

**From:** [Steve Schueth](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:51:07 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are "technically or financially infeasible" and "in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS"

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Steve Schueth  
stschueth@hotmail.com [your location will go here]

**From:** [Jane Clark](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:50:21 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Jane Clark  
kelly1946@msn.com [your location will go here]

**From:** [thomas moore](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:50:18 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
thomas moore  
basil\_1954@hotmail.com [your location will go here]

**From:** [Elliott Sernel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:50:14 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Elliott Sernel  
[esernel@pacbell.net](mailto:esernel@pacbell.net) [your location will go here]

**From:** [Susan Bortolussi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:50:09 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Susan Bortolussi  
[susie1055@aol.com](mailto:susie1055@aol.com) [your location will go here]

**From:** [Marianne Garau](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:50:07 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS’ plan.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Marianne Garau  
mlevakis@hotmail.com [your location will go here]

**From:** [Kathryn Fox](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:48:22 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Kathryn Fox  
knfox2004@yahoo.com [your location will go here]



**From:** [AMANDA STONEBANK](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:48:21 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures." During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
AMANDA STONEBANK  
afssunshine1@gmail.com [your location will go here]

**From:** [Daniel OBrien](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:48:17 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Cows produce 150 billion gallons of methane per day.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Daniel OBrien  
[dgobthunder@hotmail.com](mailto:dgobthunder@hotmail.com) [your location will go here]

**From:** [Janelle George](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:48:11 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Janelle George  
pumpkin222001@yahoo.com [your location will go here]

**From:** [Jody Gibson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:47:07 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Jody Gibson  
[jodyg8@msn.com](mailto:jodyg8@msn.com) [your location will go here]

**From:** [A.Martin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:46:12 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
A Martin  
afton\_kevin@live.com [your location will go here]

**From:** [David Ross](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:46:08 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
David Ross  
[headhunt@stellareng.com](mailto:headhunt@stellareng.com) [your location will go here]

**From:** [Ms Lilith](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:44:23 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Ms Lilith  
ladycat76@hotmail.com [your location will go here]

**From:** [Salissa Chavez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:44:08 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Salissa Chavez  
salissac04@gmail.com [your location will go here]



**From:** [Janell Curtis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:43:08 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Janell Curtis  
thumper56308@yahoo.com [your location will go here]

**From:** [Walter Bishop](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:42:08 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Kindly act in the best interest of the public good.

Sincerely,  
Walter Bishop  
orindawood@gmail.com [your location will go here]

**From:** [Al Bradley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:41:16 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,

**From:** [Carolyn Bishop](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:41:07 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Carolyn Bishop  
cbishopma@icloud.com [your location will go here]

**From:** [Miriam Kurland](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:41:04 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Miriam Kurland  
[mimbck@yahoo.com](mailto:mimbck@yahoo.com) [your location will go here]

**From:** [Sam Matthews](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:39:18 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Methane has a global warming potential 86 times that of CO<sub>2</sub> on a 20-year time frame.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Sam Matthews  
[samson1999@hotmail.co.uk](mailto:samson1999@hotmail.co.uk) [your location will go here]

**From:** [Laura Herndon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:39:09 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Laura Herndon  
[laura.herndon@disney.com](mailto:laura.herndon@disney.com) [your location will go here]

**From:** [Arnie Schildhaus](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:39:07 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Arnie Schildhaus  
jamaps@gmail.com [your location will go here]



**From:** [Mary Morse](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:38:29 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Mary Morse  
[marhenmik@live.com](mailto:marhenmik@live.com) [your location will go here]

**From:** [Iris Patty Yermak](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:38:09 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Iris Patty Yermak  
sandy253@verizon.net [your location will go here]

**From:** [Laura Rice](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:38:07 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Laura Rice  
[Leukiesnake@yahoo.com](mailto:Leukiesnake@yahoo.com) [your location will go here]

**From:** [William Mittig](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:37:09 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
William Mittig  
wpmittig@gmail.com [your location will go here]

**From:** [Marie DAnna](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:36:21 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Marie DAnna  
madanna102@aol.com [your location will go here]

**From:** [Steve Tyler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:36:19 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Steve Tyler  
abc3dtd@gmail.com [your location will go here]

**From:** [Jewell Batway](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:36:17 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

**From:** [Pamela VourosCallahan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:35:16 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Pamela VourosCallahan  
[pamelazoe@hotmail.com](mailto:pamelazoe@hotmail.com) [your location will go here]



**From:** [MariBeth Doran](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:35:12 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
MariBeth Doran  
[mbethdoran@gmail.com](mailto:mbethdoran@gmail.com) [your location will go here]

**From:** [David Meade](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:35:11 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
David Meade  
dvdm7@gmail.com [your location will go here]

**From:** [Jim Brunton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:35:09 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Jim Brunton  
[jimbrunton@yahoo.com](mailto:jimbrunton@yahoo.com) [your location will go here]

**From:** [Rhonda Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:32:26 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Please protect the native tule elk from being culled in our National Seashore.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Rhonda Anderson  
rolene37@gmail.com [your location will go here]

**From:** [cave man](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:32:21 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [Helen LaDeau](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:32:15 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

“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.”

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Helen LaDeau  
hladeau@comcast.net [your location will go here]

**From:** [Pamela Slater Price](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:32:07 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

“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.”

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher’s plan.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let’s restore our National Seashore

Sincerely,  
Pamela Slater Price  
[pcslater@mac.com](mailto:pcslater@mac.com) [your location will go here]

**From:** [Jaen Lawrence](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:31:15 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

US Methane emissions from livestock and natural gas are nearly equal.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS’ plan.

Sincerely,  
Jaen Lawrence  
[jaenl@andell.com](mailto:jaenl@andell.com) [your location will go here]



**From:** [ann malyon](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:31:13 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like “Clean Coal.”

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8’ fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS’ plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS’ plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
ann malyon  
issue@mypacks.net [your location will go here]

**From:** [KENDRICK MILLER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:30:20 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
KENDRICK MILLER  
kwmill@pacbell.net [your location will go here]

**From:** [Kristin Campbell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:30:16 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Kristin Campbell  
Kpcampbell88@aol.com [your location will go here]

**From:** [Sue Velez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:28:18 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Sue Velez  
flimsysue@gmail.com [your location will go here]

**From:** [Robin Peterson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:28:11 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

The CCC should not approve of a Climate Action Strategy from the NPS that can’t prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS’ plan, as it is time to end these unnecessary impacts.

Sincerely,  
Robin Peterson  
rpeterson1117@gmail.com [your location will go here]

**From:** [Christina Williams](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:27:21 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Cows produce 150 billion gallons of methane per day.

Please protect the native tule elk from being culled in our National Seashore.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Christina Williams  
clmw67@gmail.com [your location will go here]

**From:** [Ernie Walters](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:27:13 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Ernie Walters  
[ernwalt@aol.com](mailto:ernwalt@aol.com) [your location will go here]

**From:** [Darlene Friedman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:27:10 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Darlene Friedman  
Parula100@aol.com [your location will go here]



**From:** [James Mulcare](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:26:14 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Beef and dairy operations are well known to be leading causes of climate change, so they don’t belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of “regenerative grazing” (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let’s restore our National Seashore

Sincerely,  
James Mulcare  
JSMulcare52@gmail.com [your location will go here]

**From:** [Christina Williams](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:26:13 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significantly polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Christina Williams  
clmw67@gmail.com [your location will go here]

**From:** ["JOHN P."](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:26:10 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
JOHN P.  
jpnycs46@yahoo.com [your location will go here]

**From:** [Jessica Cresseveur](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:25:13 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Jessica Cresseveur  
jmccress@gmail.com [your location will go here]

**From:** [Mari Dominguez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:25:13 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.’s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of “Clean Coal.” I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Mari Dominguez  
[tweetymrsl@aol.com](mailto:tweetymrsl@aol.com) [your location will go here]

**From:** [Robert Posch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:25:09 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Robert Posch  
robertposch323@gmail.com [your location will go here]

**From:** [Samuel Sautaux](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:25:07 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Samuel Sautaux  
[samuel.sautaux@bluewin.ch](mailto:samuel.sautaux@bluewin.ch) [your location will go here]

**From:** [Danielle Jesensky](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:24:13 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as “regenerative ranching,” “carbon farming,” etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The tule elk naturally belong in the coastal prairie of Point Reyes. Unlike cows, who greatly outnumber the elk.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Danielle Jesensky  
djesensky@hotmail.com [your location will go here]



**From:** [Theodore King](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:24:11 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The final Point Reyes General Management Plan Amendment EIS presents fecal bacteria data from fourteen PRNS surface water locations between 1999 and 2013. Safe levels were exceeded at all sampling locations, ranging as high as 1.6 million MPN/100 ml. Compare that to the water quality standard of 240 MPN/100 ml for water contact recreation, which after all is what we come to our National Seashore for.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Theodore King  
txk13@hotmail.com [your location will go here]

**From:** ["R.A.L. West"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:24:06 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Cows produce 150 billion gallons of methane per day.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
R.A.L. West  
ralive9@gmail.com [your location will go here]

**From:** [Dana Bleckinger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:23:24 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it’s time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It’s past time for the cows to be removed from the seashore.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS’ purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California’s endemic Tule elk.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Dana Bleckinger  
[dbleckinger@yahoo.com](mailto:dbleckinger@yahoo.com) [your location will go here]

**From:** [Deidra Lunn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:23:16 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Deidra Lunn  
nobodybutus2@comcast.net [your location will go here]

**From:** [Cheryl Eames](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:23:11 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Cheryl Eames  
[ceeames@csulb.edu](mailto:ceeames@csulb.edu) [your location will go here]

**From:** [Kathleen McHendry](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:22:37 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Kathleen McHendry

**From:** [ALESSANDRO GANGEMI](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:22:14 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
ALESSANDRO GANGEMI  
artax\_c3@hotmail.com [your location will go here]

**From:** [Pamela Olsen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:22:14 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Pamela Olsen  
[pamee11793@yahoo.com](mailto:pamee11793@yahoo.com) [your location will go here]



**From:** [June Green](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:22:08 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
June Green  
juneon170@aol.com [your location will go here]

**From:** [Andrew Hinz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:21:18 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Andrew Hinz  
[ahinz61@outlook.com](mailto:ahinz61@outlook.com) [your location will go here]

**From:** [Kerri Mcgoldrick](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:21:10 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Kerri Mcgoldrick  
[mcgoldrick.kerri@gmail.com](mailto:mcgoldrick.kerri@gmail.com) [your location will go here]

**From:** [Heather Buchanan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:20:15 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Heather Buchanan  
Brmarcanan7@gmail.com [your location will go here]

**From:** [Brian Field](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:20:08 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Brian Field  
field37@comcast.net [your location will go here]

**From:** [Lisa Zales](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:19:18 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Cows produce 150 billion gallons of methane per day.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Lisa Zales  
[lisazales44@gmail.com](mailto:lisazales44@gmail.com) [your location will go here]

**From:** [Skot McDaniel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:17:17 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like “Clean Coal.”

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Skot McDaniel  
[engineerskot@gmail.com](mailto:engineerskot@gmail.com) [your location will go here]

**From:** [Janet Thew](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:17:13 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Janet Thew  
[gavelgoddess@gmail.com](mailto:gavelgoddess@gmail.com) [your location will go here]



**From:** [Lisa Mazzola](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:17:10 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Lisa Mazzola  
[lmazzola@tampabay.rr.com](mailto:lmazzola@tampabay.rr.com) [your location will go here]

**From:** ["larry & phyllis stites"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:16:11 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
larry & phyllis stites  
larrphyls@att.net [your location will go here]

**From:** [Meagan Fastuca](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:16:07 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Meagan Fastuca  
[meagan.fastuca@gmail.com](mailto:meagan.fastuca@gmail.com) [your location will go here]

**From:** [Joan Glasser](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:15:36 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,

**From:** [Linda Pemberton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:15:26 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Linda Pemberton  
[animalibnow@gmail.com](mailto:animalibnow@gmail.com) [your location will go here]

**From:** [Judith Smith](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:15:24 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Judith Smith  
[axisdance@comcast.net](mailto:axisdance@comcast.net) [your location will go here]

**From:** [O Lewis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:15:21 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

**From:** [Ainslie Gilligan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:15:12 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Cows produce 150 billion gallons of methane per day.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Ainslie Gilligan  
[ainslie.gilligan@gmail.com](mailto:ainslie.gilligan@gmail.com) [your location will go here]



**From:** [Doris Potter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:15:10 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Doris Potter  
dorispotter99@gmail.com [your location will go here]

**From:** [Robert Jardine](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:15:09 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Robert Jardine  
[rljardine@gmail.com](mailto:rljardine@gmail.com) [your location will go here]

**From:** [Michelle Setaro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:14:08 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Michelle Setaro  
[just4us1555@yahoo.com](mailto:just4us1555@yahoo.com) [your location will go here]

**From:** ["Heidi Steinert-Bresilge"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:13:18 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Heidi Steinert-Bresilge  
conoverschnuck4@yahoo.com [your location will go here]

**From:** [Michelle Setaro](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:13:09 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Michelle Setaro  
[just4us1555@yahoo.com](mailto:just4us1555@yahoo.com) [your location will go here]

**From:** [Kathy Simington](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:13:06 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Kathy Simington  
bellarose4ever@yahoo.com [your location will go here]

**From:** ["S.L. May"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:12:25 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS’ plan (CD-0006-02)

Sincerely,  
S.L. May  
slmay49@gmail.com [your location will go here]

**From:** [Lois White](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:12:22 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

It is of great concern politicians at the local and federal level support the NPS’s actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS’ plan (CD-0006-02)

Sincerely,  
Lois White  
loeyw1@gmail.com [your location will go here]



**From:** [Karen Jacques](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:12:10 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS’ own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne’s disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS’ plan

Sincerely,  
Karen Jacques  
[threegables1819@gmail.com](mailto:threegables1819@gmail.com) [your location will go here]

**From:** [AIXA FIELDER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:11:08 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
AIXA FIELDER  
[aixa1@sbcglobal.net](mailto:aixa1@sbcglobal.net) [your location will go here]

**From:** [Margaret DeMott](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:10:35 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Margaret DeMott  
[louisfeldman@sbcglobal.net](mailto:louisfeldman@sbcglobal.net) [your location will go here]

**From:** [Doris Alpern](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:10:29 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Doris Alpern  
[dalpern@verizon.net](mailto:dalpern@verizon.net) [your location will go here]

**From:** [Ashok and Kiran Bajaj](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:10:24 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Ashok and Kiran Bajaj  
Cindy.guarnieri@hotmail.com [your location will go here]

**From:** [Claire Perricelli](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:10:11 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Cows produce 150 billion gallons of methane per day.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Claire Perricelli  
ceperr@sbcglobal.net [your location will go here]

**From:** [Slowomir and irene Przybysz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:10:10 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Slowomir and irene Przybysz  
p0land81@hotmail.com [your location will go here]

**From:** [Anne Kaufmann](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:10:07 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Anne Kaufmann  
[bordercollies.greatestfan@gmail.com](mailto:bordercollies.greatestfan@gmail.com) [your location will go here]



**From:** [Valerie Sotere](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:09:14 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are "technically or financially infeasible" and "in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS"

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Valerie Sotere  
[Rudyofvalley@att.net](mailto:Rudyofvalley@att.net) [your location will go here]

**From:** [Catherine Loudis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:09:11 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

It is of great concern politicians at the local and federal level support the NPS’s actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Catherine Loudis  
crloudis@gmail.com [your location will go here]

**From:** [Cindy and Christine Guarnieri](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:09:07 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term ‘clean coal’ used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

It is of great concern politicians at the local and federal level support the NPS’s actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

The CCC’s mission is to protect and enhance the California coast. It reads “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.”

Per the CCC’s mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Cindy and Christine Guarnieri

**From:** [Robert Badcock](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:09:06 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Cows produce 150 billion gallons of methane per day.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Robert Badcock  
[robert.badcock@blueyonder.co.uk](mailto:robert.badcock@blueyonder.co.uk) [your location will go here]

**From:** ["Diane-Michele Petrillo"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:08:19 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Kindly act in the best interest of the public good.

Sincerely,  
Diane-Michele Petrillo  
[dcosmo@att.net](mailto:dcosmo@att.net) [your location will go here]

**From:** [Cindy and Christine Guarnieri](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:08:18 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Cindy and Christine Guarnieri  
[cindy.guarnieri@hotmail.com](mailto:cindy.guarnieri@hotmail.com) [your location will go here]

**From:** [Stefan Taylor](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:08:13 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Stefan Taylor  
ststevetaylor8@gmail.com [your location will go here]

**From:** [Bruce and Maureen DeNunzio](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:08:10 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Bruce and Maureen DeNunzio  
Milano3031@yahoo.com [your location will go here]



**From:** [Kristina Wunder](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:08:06 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Kristina Wunder  
kristinasattler@hotmail.com [your location will go here]

**From:** [Mark Koritz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:07:15 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of "best management practices" (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park's waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Kindly act in the best interest of the public good.

Sincerely,  
Mark Koritz  
mkoritz2002@yahoo.com [your location will go here]

**From:** [Ellen McCann](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:06:21 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Ellen McCann  
[ellenmccann63@hotmail.com](mailto:ellenmccann63@hotmail.com) [your location will go here]

**From:** [Janet Delaney](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:06:16 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

The NPS is being sued because the NPS’ Plan is violating the NPS’ own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS’ plan inconsistent with the Coastal Act.

Sincerely,  
Janet Delaney  
jld215@sbcglobal.net [your location will go here]

**From:** [Deborah Santone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:05:15 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS’ plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Deborah Santone  
[djsantone@comcast.net](mailto:djsantone@comcast.net) [your location will go here]

**From:** [Robert Thornhill](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:05:13 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Robert Thornhill  
[robertthornhill14@yahoo.com](mailto:robertthornhill14@yahoo.com) [your location will go here]

**From:** [Kelly Berry](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:05:12 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Kelly Berry  
[kellyberr@hotmail.com](mailto:kellyberr@hotmail.com) [your location will go here]

**From:** [Donna Hamilton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:05:07 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Donna Hamilton  
[donnabrattychick@yahoo.com](mailto:donnabrattychick@yahoo.com) [your location will go here]



**From:** [Mary Thornton](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:04:25 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Mary Thornton  
marybrabson01@gmail.com [your location will go here]

**From:** [B.G](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:04:24 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
B G  
barbaran2323@gmail.com [your location will go here]

**From:** [Sabina Sonneman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:04:20 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Sabina Sonneman  
[dr.sonneman@gmail.com](mailto:dr.sonneman@gmail.com) [your location will go here]

**From:** [Denise Snyder](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:04:18 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Denise Snyder  
[denisesnyder@live.com](mailto:denisesnyder@live.com) [your location will go here]

**From:** [Ann Sandritter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:04:05 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Ann Sandritter  
[Asndrttr@aol.com](mailto:Asndrttr@aol.com) [your location will go here]

**From:** [Gerald Hallam](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:03:31 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let’s use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS’ Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Gerald Hallam  
alan1955h@aol.com [your location will go here]

**From:** [Thomas Ervin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:03:30 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Thomas Ervin  
[thomas.ervin@comcast.net](mailto:thomas.ervin@comcast.net) [your location will go here]

**From:** [Deb Castellana](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:03:23 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore’s GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an ‘off-set’.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Deb Castellana  
[deb.castellana@gmail.com](mailto:deb.castellana@gmail.com) [your location will go here]



**From:** [Sandra BonSell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:03:21 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Sandra BonSell  
sbonsell@mac.com [your location will go here]

**From:** [Lisa Reich](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:03:19 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Lisa Reich  
[purpletortoise7@gmail.com](mailto:purpletortoise7@gmail.com) [your location will go here]

**From:** [Rhonda Bradley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:03:17 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS’ plan.

Sincerely,  
Rhonda Bradley  
rgbradley@charter.net [your location will go here]

**From:** [Gerald Hallam](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:03:11 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Gerald Hallam  
alan1955h@aol.com [your location will go here]

**From:** [David Burns](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:03:09 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
David Burns  
dcb1995@comcast.net [your location will go here]

**From:** [Jane Drews](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:02:30 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

Please protect the native tule elk from being culled in our National Seashore.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Jane Drews  
jcd907@gmail.com [your location will go here]

**From:** [Mary Franklin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:02:20 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Mary Franklin  
maryfranklin92@gmail.com [your location will go here]

**From:** [Gay Goden](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:02:07 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don’t resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn’t enable natural composting, and results in water pollution.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne’s disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Gay Goden  
[maxibemis@sbcglobal.net](mailto:maxibemis@sbcglobal.net) [your location will go here]



**From:** [Denise Martini](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:00:47 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Denise Martini  
[martini187@aol.com](mailto:martini187@aol.com) [your location will go here]

**From:** [Francine Traniello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:00:39 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Cows produce 150 billion gallons of methane per day.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Francine Traniello  
MidnightBlue\_22@webtv.net [your location will go here]

**From:** [Marya Zanders](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:00:31 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are "technically or financially infeasible" and "in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS"

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Marya Zanders  
caravanz2@yahoo.com [your location will go here]

**From:** [Robert Gartner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:00:31 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS’ purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California’s endemic Tule elk.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Robert Gartner  
[planetaryg@yahoo.com](mailto:planetaryg@yahoo.com) [your location will go here]

**From:** [Laura Ricci](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:00:28 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Laura Ricci  
llaura1964@outlook.com [your location will go here]

**From:** [Natalie Alexander](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:00:16 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Natalie Alexander  
n4nettly@hotmail.com [your location will go here]

**From:** [Peter Broderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 3:00:10 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Peter Broderson  
[Peterbroderson@hotmail.com](mailto:Peterbroderson@hotmail.com) [your location will go here]

**From:** [Kathleen Grossman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:59:07 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Kathleen Grossman  
kgtigerlily@gmail.com [your location will go here]



**From:** [Deidre and Ronald Brown](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:58:50 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Deidre and Ronald Brown  
conbro.32578@gmail.com [your location will go here]

**From:** [David Bruce Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:58:40 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
David Bruce Anderson  
[andersondb@gmail.com](mailto:andersondb@gmail.com) [your location will go here]

**From:** [Amy Iagrone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:58:33 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Amy Iagrone  
[amy\\_lagrone@yahoo.com](mailto:amy_lagrone@yahoo.com) [your location will go here]

**From:** [Teresa Silver](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:58:32 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Teresa Silver  
tewlowery@gmail.com [your location will go here]

**From:** [Sophia Vassilakidis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:58:27 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The Commission’s post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore’s waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC’s deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Assuming the NPS’ strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg “The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock “does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate.” The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS’ strategy.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Kindly act in the best interest of the public good.

Sincerely,  
Sophia Vassilakidis  
[manglebaby@hotmail.com](mailto:manglebaby@hotmail.com) [your location will go here]

**From:** [Thom Peters](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:58:22 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Thom Peters  
voice4wild@aol.com [your location will go here]

**From:** [Mel Apodaca](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:58:10 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Mel Apodaca  
dsgmel@msn.com [your location will go here]

**From:** [Gretchen Wagner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:58:08 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Gretchen Wagner  
dddrrums@hotmail.com [your location will go here]



**From:** [sheila larkin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:57:24 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
sheila larkin

**From:** [Terry Tedesco](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:57:18 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Terry Tedesco  
ttedesco49@yahoo.com [your location will go here]

**From:** [Robert Wohlberg](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:57:14 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Robert Wohlberg  
robertwohlberg@gmail.com [your location will go here]

**From:** [Tracey katsouros](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:57:09 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Tracey katsouros  
[traceysmallwood@gmail.com](mailto:traceysmallwood@gmail.com) [your location will go here]

**From:** [Susan Sloan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:56:38 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Susan Sloan  
[suesloan@earthlink.net](mailto:suesloan@earthlink.net) [your location will go here]

**From:** [Robert Bruce Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:56:31 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Robert Bruce Anderson  
[rbasf@earthlink.net](mailto:rbasf@earthlink.net) [your location will go here]

**From:** [Andarin Arvola](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:56:28 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Andarin Arvola  
[andarin@mcn.org](mailto:andarin@mcn.org) [your location will go here]

**From:** [Cora Luce](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:56:22 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Cora Luce  
clmariek@gmail.com [your location will go here]



**From:** [Tracy Ouellette](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:56:06 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Tracy Ouellette  
tracyjouellette@gmail.com [your location will go here]

**From:** [Camille Gilbert](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:55:37 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Camille Gilbert  
[camillegilbert@aol.com](mailto:camillegilbert@aol.com) [your location will go here]

**From:** [Vittorio Ricci](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:55:26 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please do not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Vittorio Ricci  
[ricci.v@libero.it](mailto:ricci.v@libero.it) [your location will go here]

**From:** [Peter Wood](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:55:14 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Peter Wood  
nativeofny1@yahoo.com [your location will go here]

**From:** ["Regina Gandour-Edwards"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:55:10 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

**From:** [Gregory Freeman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:55:09 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Gregory Freeman  
[ashcreekgreg@yahoo.com](mailto:ashcreekgreg@yahoo.com) [your location will go here]

**From:** [Bernardo Alayza Mujica](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:54:13 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Bernardo Alayza Mujica  
beralmu@gmail.com [your location will go here]

**From:** [Maria Mariorenzi](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:54:08 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS' purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California's endemic Tule elk.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Maria Mariorenzi  
Sassylou3@gmail.com [your location will go here]



**From:** [Scott Vayo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:54:06 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Please protect the native tule elk from being culled in our National Seashore.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Scott Vayo  
svayo@nbbj.com [your location will go here]

**From:** [Gloria Shen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:53:35 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

The NPS’ Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary, and caution that these approaches are greenwashing attempts, like “Clean Coal.”

Please protect the native tule elk from being culled in our National Seashore.

The CCC’s mission is to protect and enhance the California coast. It reads “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.”

Per the CCC’s mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Gloria Shen  
[gloshen@yahoo.com](mailto:gloshen@yahoo.com) [your location will go here]

**From:** [Tony Gray](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:53:30 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Tony Gray  
[ezekiellst@sbcglobal.net](mailto:ezekiellst@sbcglobal.net) [your location will go here]

**From:** [Karen L Pecsok](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:53:19 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Karen L Pecsok  
kpecsok@gmail.com [your location will go here]

**From:** [Jerri Berg](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:53:06 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Comments on the draft GMPA and draft EIS from the San Francisco Regional Water Quality Control Board to NPS regarding the GMP echo the concern of over-optimistic expectations for ongoing improvements. It is asked of the Commission to assess independently whether or not the best management practices for keeping cattle manure out of our waterways, based on the topography of the landscape, can truly occur.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Jerri Berg  
catglad@yahoo.com [your location will go here]

**From:** [Chen Sapirstein](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:52:40 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Chen Sapirstein  
[sapirstein.chen@gmail.com](mailto:sapirstein.chen@gmail.com) [your location will go here]

**From:** [Ken Kipen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:52:36 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

The United Nations states, "The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures."  
During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Ken Kipen  
kenfires2@gmail.com [your location will go here]

**From:** [Rocio Luparello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:52:30 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Rocio Luparello  
[rocioluparello@hotmail.com](mailto:rocioluparello@hotmail.com) [your location will go here]



**From:** [Anthony Montapert](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:52:28 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Please protect the native tule elk from being culled in our National Seashore.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Anthony Montapert  
[amontapert@comcast.net](mailto:amontapert@comcast.net) [your location will go here]

**From:** [Ron Parsons](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:52:24 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

**From:** [Suneet Srivastava](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:52:17 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Suneet Srivastava  
[suneetforcharity@gmail.com](mailto:suneetforcharity@gmail.com) [your location will go here]

**From:** [louis gauci](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:52:11 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
louis gauci  
lgauc8@gmail.com [your location will go here]

**From:** [Matt Brzezinski](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:52:08 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Matt Brzezinski  
[bonoone@aol.com](mailto:bonoone@aol.com) [your location will go here]

**From:** ["Eileen Jennis-Sauppe"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:51:21 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS’ plan and help us save our Seashore.

Sincerely,

**From:** [Kristi Meyer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:51:20 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Kristi Meyer  
[ItMattersToKristi@gmail.com](mailto:ItMattersToKristi@gmail.com) [your location will go here]

**From:** [April Eversole](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:50:30 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

US Methane emissions from livestock and natural gas are nearly equal.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
April Eversole  
icecat302000@yahoo.com [your location will go here]



**From:** [Mary Ann McFarland](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:50:13 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

It is of great concern politicians at the local and federal level support the NPS's actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Mary Ann McFarland  
[maryannmcfarland@me.com](mailto:maryannmcfarland@me.com) [your location will go here]

**From:** [Chris Carpenter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:49:33 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Chris Carpenter  
[chriscarpenter@comcast.net](mailto:chriscarpenter@comcast.net) [your location will go here]

**From:** [Rob Seltzer](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:49:22 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Rob Seltzer  
RSSCPA@EARTHLINK.NET [your location will go here]

**From:** [Richard Sanders](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:48:06 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Richard Sanders  
actiondave72@gmail.com [your location will go here]

**From:** [DALE STEICHEN](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:47:57 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
DALE STEICHEN  
dpjsteichen@aol.com [your location will go here]

**From:** ["Caroline Sévilla"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:47:56 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

**From:** [gary parlette](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:47:52 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
gary parlette  
[parlettegary@yahoo.com](mailto:parlettegary@yahoo.com) [your location will go here]

**From:** [Lindsay Johnson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:47:47 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Lindsay JOhnson  
linzman@comcast.net [your location will go here]



**From:** [Raleigh Koritz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:47:42 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Raleigh Koritz  
tabbykat7285@outlook.com [your location will go here]

**From:** [Nancy Disimone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:47:40 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Nancy Disimone  
[nancy17disimone@gmail.com](mailto:nancy17disimone@gmail.com) [your location will go here]

**From:** [Anita Scheunemann](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:47:31 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

US Methane emissions from livestock and natural gas are nearly equal.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Anita Scheunemann  
[arscheu@comcast.net](mailto:arscheu@comcast.net) [your location will go here]

**From:** [Mary Whitlow](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:46:17 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels of E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact on marine life in the ocean.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Mary Whitlow  
marylw5044@att.net [your location will go here]

**From:** [Georgia Braithwaite](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:46:13 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

Please protect the native tule elk from being culled in our National Seashore.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Georgia Braithwaite  
[georgiabraithwaite@yahoo.com](mailto:georgiabraithwaite@yahoo.com) [your location will go here]

**From:** [rob fursich](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:45:09 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

**From:** [Ted Fishman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:44:28 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Ted Fishman  
ted10000@hotmail.com [your location will go here]

**From:** [Elise McCoubrie](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:44:27 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Elise McCoubrie  
[emccoubrie@yahoo.com](mailto:emccoubrie@yahoo.com) [your location will go here]



**From:** [Diane Zinni](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:44:21 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The NPS' General Management Plan Amendment (GMPA) for PRNS legally must not impair any park resources, including water. However water quality data provided to the Commission to date clearly documents impairment to water quality continues. It is time to end tenant cattle ranching in our National Seashore, the only National Seashore on the Pacific Coast.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Diane Zinni  
[mtnbliss@gmail.com](mailto:mtnbliss@gmail.com) [your location will go here]

**From:** [Roger Hollander](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:44:17 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Roger Hollander  
rojay2020jk@gmail.com [your location will go here]

**From:** [Diane Kastel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:44:15 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Diane Kastel  
classylady1@comcast.net [your location will go here]

**From:** [Jennifer Edelen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:44:10 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore’s GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an ‘off-set’.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Jennifer Edelen  
elvenmommy3@yahoo.com [your location will go here]

**From:** [Robert Brown](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:44:05 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Robert Brown  
larkbrown@comcast.net [your location will go here]

**From:** [Mary Walls](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:43:22 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, “The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention.” This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS’s extensive past history, the Commission can expect more of the same. It’s important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Mary Walls  
[mwalls50@comcast.net](mailto:mwalls50@comcast.net) [your location will go here]

**From:** [Kimberly Allen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:43:12 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

No amount of “best practices” will ever stop beef and dairy operations from being a villain in the struggle against climate change.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Kimberly Allen  
[kalleninteriors@aol.com](mailto:kalleninteriors@aol.com) [your location will go here]

**From:** [Susan Dubovsky](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:43:12 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,



**From:** [Christina DeRespiris](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:43:10 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Christina DeRespiris  
[cderespiris@yahoo.com](mailto:cderespiris@yahoo.com) [your location will go here]

**From:** [Edna Mullen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:43:06 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS’ own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

Please provide our native Tule Elk from the NPS’ and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Edna Mullen  
stokesouth@sky.com [your location will go here]

**From:** [Karen Matkovic](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:43:05 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Karen Matkovic  
[karen1753@aol.com](mailto:karen1753@aol.com) [your location will go here]

**From:** ["Virgene Link-New"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:42:10 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Virgene Link-New  
linkerwan@yahoo.com [your location will go here]

**From:** [THERESA EVERETT](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:42:05 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (Enterococcus is another large genus of bacteria)."

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
THERESA EVERETT

**From:** [Diane Kastel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:41:33 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let’s restore our National Seashore

Sincerely,  
Diane Kastel  
classylady1@comcast.net [your location will go here]

**From:** [Mary Wylie](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:41:27 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Mary Wylie  
wyliepat@hotmail.com [your location will go here]

**From:** [Judith Anshin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:41:23 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Judith Anshin  
[penguinatlaw@hotmail.com](mailto:penguinatlaw@hotmail.com) [your location will go here]



**From:** [Julie Block](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:41:21 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Julie Block  
jblock0920@gmail.com [your location will go here]

**From:** [Lyn du Mont](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:41:16 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let’s use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS’ Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
Lyn du Mont  
8a5a4408@opayq.com [your location will go here]

**From:** [Linda Gazzola](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:41:10 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS’ own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS’ plan.

Sincerely,  
Linda Gazzola  
xenafan431@aol.com [your location will go here]

**From:** [David Brooks](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:41:08 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
David Brooks  
poppaotter1@icloud.com [your location will go here]

**From:** [joan johnston](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:41:06 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
joan johnston  
[joankevin2003@yahoo.com](mailto:joankevin2003@yahoo.com) [your location will go here]

**From:** [John Dale Kennedy](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:40:32 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

Due to the NPS’ plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS’ plan (CD-0006-02).

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
John Dale Kennedy  
tandoorii@comcast.net [your location will go here]

**From:** [Stephen House](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:40:29 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Stephen House  
[huckstorff@gmail.com](mailto:huckstorff@gmail.com) [your location will go here]

**From:** [Catherine Vedder](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:40:22 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,



**From:** [Lacey Levitt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:40:19 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Please protect the native tule elk from being culled in our National Seashore.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Lacey Levitt  
[lacleylevitt@gmail.com](mailto:lacleylevitt@gmail.com) [your location will go here]

**From:** [Susan Krause](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:40:12 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Susan Krause  
skrause442@yahoo.com [your location will go here]

**From:** [Wendy Honold](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:40:06 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Wendy Honold  
wendyhonold@yahoo.com [your location will go here]

**From:** [p Nunez](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:39:24 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

As decision makers in this very consequential time your decisions will have historic impact. Please beware of “greenwashing” by vested agricultural interests with buzz words like “regenerative” or “carbon” farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary.and caution that these approaches are greenwashing attempts, like “Clean Coal.”

I urge the Commission to not support the NPS’ plan to cull native Tule elk in PRNS.

The impacts of ranching in PRNS is well documented in the NPS’ own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
p Nunez  
patbankers@yahoo.com [your location will go here]

**From:** [Susan Dubovsky](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:39:18 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Susan Dubovsky  
sshanti@ymail.com [your location will go here]

**From:** [janie rhodus](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:39:11 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC’s efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission’s CD requirements, the issue of NPS reliability still justifies the CCC’s withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
janie rhodus  
jrhodus0546@sbcglobal.net [your location will go here]

**From:** ["Mari Mennel-Bell"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:39:08 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Mari Mennel-Bell  
mari471@aol.com [your location will go here]

**From:** [Michelle Blackley](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:39:08 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Michelle Blackley  
micheller43fan@yahoo.com [your location will go here]



**From:** [Jonathan Mitchell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:39:06 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Kindly act in the best interest of the public good.

Sincerely,  
Jonathan Mitchell  
[throwaways@yahoo.com](mailto:throwaways@yahoo.com) [your location will go here]

**From:** [Nora Lewis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:38:17 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The NPS posted a water quality monitoring plan from 2001. Therefore the reluctance of the NPS to propose an updated Water Quality Strategy to the Commission, per mutual agreement, at the April 2022 meeting, is telling. The NPS are aware of the ongoing high levels of pollution occurring in PRNS, caused by tenant ranchers. It is imperative for the health of our environment, our ocean and aquatic life, that the Commission rescind their conditional approval on CD-0006-02, and partner with the public who are against the continual destruction in PRNS caused by private cattle ranching.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

Please protect the native tule elk from being culled in our National Seashore.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Nora Lewis  
noracnm@verizon.net [your location will go here]

**From:** [Diane Kastel](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:38:14 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Diane Kastel  
classylady1@comcast.net [your location will go here]

**From:** [Charlene Kerchevall](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:38:12 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Charlene Kerchevall  
[ramblin@cox.net](mailto:ramblin@cox.net) [your location will go here]

**From:** [Antje Fray](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:38:06 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Antje Fray  
[elaan2@yahoo.com](mailto:elaan2@yahoo.com) [your location will go here]

**From:** [Claudia Wornum](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:37:22 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS’ plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Claudia Wornum  
[claudiawornum@comcast.net](mailto:claudiawornum@comcast.net) [your location will go here]

**From:** [julie Rose](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:37:19 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
julie Rose  
[julierose22@sbcglobal.net](mailto:julierose22@sbcglobal.net) [your location will go here]

**From:** [Joanne DeHart](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:37:16 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Beef cattle and dairy cows are not naturally suited to the Western coastal prairie. They graze in such a way that destroys the root system of native plants, which causes erosion. And their excess manure isn't completely composted, which is why surface water at PRNS has such high levels of contamination.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Joanne DeHart  
[joannedh1@aol.com](mailto:joannedh1@aol.com) [your location will go here]



**From:** [Arielle Schechter](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:37:14 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Cows produce 150 billion gallons of methane per day.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Arielle Schechter  
[acsarchitect@icloud.com](mailto:acsarchitect@icloud.com) [your location will go here]

**From:** [William Nichols](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:37:12 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
William Nichols  
[beertrekker@hotmail.com](mailto:beertrekker@hotmail.com) [your location will go here]

**From:** [Mark Reback](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:36:12 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Mark Reback  
[mark@consumerwatchdog.org](mailto:mark@consumerwatchdog.org) [your location will go here]

**From:** [Nicholas Prychodko](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:36:07 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.’s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of “Clean Coal.” I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS’ plan and help us save our Seashore.

Sincerely,  
Nicholas Prychodko  
[prychdk@yahoo.com](mailto:prychdk@yahoo.com) [your location will go here]

**From:** [Judith S Anderson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:35:33 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don’t capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden’s desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS’ plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS’ plan.

Sincerely,  
Judith S Anderson  
[jskanderson@earthlink.net](mailto:jskanderson@earthlink.net) [your location will go here]

**From:** [Jared Brenner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:35:27 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Jared Brenner  
[jgbrenner1@aol.com](mailto:jgbrenner1@aol.com) [your location will go here]

**From:** [Candace Batycki](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:35:25 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Candace Batycki  
candacebatycki@gmail.com [your location will go here]

**From:** [Michael DiDiego](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:35:20 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

US Methane emissions from livestock and natural gas are nearly equal.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Michael DiDiego  
spector007@yahoo.com [your location will go here]



**From:** [Chad Fordham](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:35:15 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

“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.”

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Chad Fordham  
chabbu2@yahoo.com [your location will go here]

**From:** [joan silaco](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:35:12 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
joan silaco  
m4lucky@aol.com [your location will go here]

**From:** [Carol Hoke](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:35:08 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

**From:** [Jennifer Valentine](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:34:25 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The letter from the NPS to the Commission said, "Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions." Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

It is time to end the extractive ranching industry in the only National Seashore on the California Coast. Please reconsider your conditional approval.

Sincerely,  
Jennifer Valentine  
faboo1028@yahoo.com [your location will go here]

**From:** [Sarah Stewart](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:34:21 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Kindly act in the best interest of the public good.

Sincerely,  
Sarah Stewart  
[sarahbstewart@yahoo.com](mailto:sarahbstewart@yahoo.com) [your location will go here]

**From:** [Bruce Hlodnicki](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:34:20 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission’s concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS’s refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public’s outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public’s resources.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS’ plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS’ and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS’ plan, and find the plan not consistent.

Sincerely,  
Bruce Hlodnicki  
[bjh55@sbcglobal.net](mailto:bjh55@sbcglobal.net) [your location will go here]

**From:** [Michael DiDiego](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:34:16 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Michael DiDiego  
spector007@yahoo.com [your location will go here]

**From:** [Timothy Dunn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:34:15 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Timothy Dunn  
[timdunn@optonline.net](mailto:timdunn@optonline.net) [your location will go here]



**From:** [Carol Hoke](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:34:11 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The Voeller paper (2021) states ‘fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.’ The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Carol Hoke  
carolhoke08@gmail.com [your location will go here]

**From:** [Josefine Singh](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:32 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS’ plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Josefine Singh  
[josefine\\_singh@hotmail.com](mailto:josefine_singh@hotmail.com) [your location will go here]

**From:** [Shirley Harris](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:30 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (*Enterococcus* is another large genus of bacteria)."

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,

**From:** [Dale Sorensen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:27 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Dale Sorensen  
geodale1@hotmail.com [your location will go here]

**From:** [Burkhard Broecker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:25 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called “carbon farms”?

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Burkhard Broecker  
[burkhard.broecker@t-online.de](mailto:burkhard.broecker@t-online.de) [your location will go here]

**From:** [Judy Schriebman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:24 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

As decision makers in this very consequential time your decisions will have historic impact. Please beware of "greenwashing" by vested agricultural interests with buzz words like "regenerative" or "carbon" farming. Agencies such as the U.N Intergovernmental Panel on Climate Change are realistic and deflationary and caution that these approaches are greenwashing attempts, like "Clean Coal."

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Judy Schriebman  
[judymarinsierra@gmail.com](mailto:judymarinsierra@gmail.com) [your location will go here]

**From:** [Deborah Segnan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:21 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Deborah Segnan  
debster474@msn.com [your location will go here]

**From:** [Dona LaSchiava](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:17 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Dona LaSchiava  
[dslaschiava@comcast.net](mailto:dslaschiava@comcast.net) [your location will go here]



**From:** [Judith Tanur](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:14 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Judith Tanur  
[judith.tanur@stonybrook.edu](mailto:judith.tanur@stonybrook.edu) [your location will go here]

**From:** [Agnetha Broecker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:14 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Agnetha Broecker  
[agnethabroecker@yahoo.de](mailto:agnethabroecker@yahoo.de) [your location will go here]

**From:** [Diane Sullivan](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:14 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Diane Sullivan  
[dianealida@mac.com](mailto:dianealida@mac.com) [your location will go here]

**From:** [Robert Gerosa](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:33:13 PM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Robert Gerosa  
[rljgerosa@aol.com](mailto:rljgerosa@aol.com) [your location will go here]

**From:** [AnaLisa Crandall](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:32:19 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

Please protect the native tule elk from being culled in our National Seashore.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
AnaLisa Crandall  
analisa\_duran@yahoo.com [your location will go here]

**From:** [Ingrid Broecker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:32:15 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Ingrid Broecker  
ibcrazyhorse04@yahoo.de [your location will go here]

**From:** [PAUL BABBINI](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:32:08 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

"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."

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
PAUL BABBINI  
PEBABBINI@AOL.COM [your location will go here]

**From:** [Timothy Duda](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:32:05 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Timothy Duda  
timduda@aol.com [your location will go here]



**From:** [Barbara Greenwood](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:32 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Barbara Greenwood  
[barbaragreenwood14@yahoo.com](mailto:barbaragreenwood14@yahoo.com) [your location will go here]

**From:** [mary more](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:26 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
mary more  
2mamorell@gmail.com [your location will go here]

**From:** [Walter Erhorn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:25 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Walter Erhorn  
waltererhorn@cox.net [your location will go here]

**From:** [Jim Steitz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:23 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Please help us protect our public land and coastline in PRNS. Please revoke your conditional approval, and help us end private ranching in PRNS.

Sincerely,  
Jim Steitz  
[jimsteitz@mac.com](mailto:jimsteitz@mac.com) [your location will go here]

**From:** ["Jeanne Held-Warmkessel"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:20 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Jeanne Held-Warmkessel  
[jheldwarmkessel@yahoo.com](mailto:jheldwarmkessel@yahoo.com) [your location will go here]

**From:** [Kelly Connolly](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:19 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Kelly Connolly  
[sevdasec@hotmail.co.uk](mailto:sevdasec@hotmail.co.uk) [your location will go here]

**From:** [Stefan Petersen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:15 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Stefan Petersen  
[stefan-petersen@t-online.de](mailto:stefan-petersen@t-online.de) [your location will go here]

**From:** [Anna Drummond](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:15 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Anna Drummond  
pal\_95945@yahoo.com [your location will go here]



**From:** [Walter Erhorn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:11 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public’s vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don’t miss this opportunity. Do what’s right and rescind Consistency Determination CD-0006-20. I thank you.

**From:** [Susan Watts](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:08 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Susan Watts  
[susanmwr@aol.com](mailto:susanmwr@aol.com) [your location will go here]

**From:** [Cecilia Seabrook](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:31:05 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Voeller, et. al, "Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations" argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don't work in the rain noting: "Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events." He suggests smoothing the data to examine overall declines. Unfortunately, one can't simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Cecilia Seabrook  
cecilia.seabrook@hotmail.com [your location will go here]

**From:** [janet forman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:30:24 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

It is unthinkable to have the most feces-contaminated location in America in a National Park. This level of pollution cannot be mitigated - it needs to be eliminated.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
janet forman  
fayf355@yahoo.com [your location will go here]

**From:** [Gary Beckerman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:30:22 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The NPS noted in their March 4, 2022 letter – "At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals." This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Gary Beckerman  
[rocksnfr@comcast.net](mailto:rocksnfr@comcast.net) [your location will go here]

**From:** [Mary Workman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:30:19 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

"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."

Please protect the native tule elk from being culled in our National Seashore.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Mary Workman  
moonchild718@yahoo.com [your location will go here]

**From:** [Gail Roberts](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:30:16 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Gail Roberts  
[gailkeywest@aol.com](mailto:gailkeywest@aol.com) [your location will go here]

**From:** [Joanie Steinhaus](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:30:15 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

Please withdraw your conditional approval of the NPS' plan. The public wants to see Tule Elk in our National Park, not domestic cattle.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Joanie Steinhaus  
[joanie@tirn.net](mailto:joanie@tirn.net) [your location will go here]



**From:** [Robin Bressler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:30:11 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO<sub>2</sub> deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO<sub>2</sub>. Most of this comes from manure.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Robin Bressler  
[robinhbressler@yahoo.com](mailto:robinhbressler@yahoo.com) [your location will go here]

**From:** [Teresia LaFleur](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:30:10 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

On multiple levels, the NPS has proven to be unable to effectively manage the native Tule Elk in PRNS, as they have not made appropriate choices to date, with their prioritization of cattle and tenant ranchers, over our elk and our environment. Please do not allow the NPS to cull more Tule Elk in our National Seashore, located on the coast of California.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Teresia LaFleur  
maxismom@hotmail.com [your location will go here]

**From:** [Martin Reifinger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:30:06 PM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Martin Reifinger  
[m.reifinger@gmx.net](mailto:m.reifinger@gmx.net) [your location will go here]

**From:** [Karen Slote](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:29:28 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Methane has a global warming potential 86 times that of CO2 on a 20-year time frame.

The recent NPS survey indicates that in 2021 the Drakes Beach Tule elk herd grew to 151 individuals, placing it above the 140-individual threshold for lethal removal set forth in the Record of Decision. Lethal removal of endemic Tule elk in the free-ranging herds while half of the Tule elk in the Preserve die of dehydration and malnutrition is a violation of the public trust.

The CCC’s mission is to protect and enhance the California coast. It reads “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.”

Per the CCC’s mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Karen Slote  
wzardglick@roadrunner.com [your location will go here]

**From:** [Teri Shore](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:29:25 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significantly polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

Because of livestock at PRNS, the free roaming tule elk have been infected with John's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Teri Shore  
terishore@gmail.com [your location will go here]

**From:** [Jennifer Scull](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:29:20 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are “technically or financially infeasible” and “in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS”

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

The current status of Consistency Determination (CD-0006-20) is an appeasement to grandfathered landholders and industrial practices. By contract to the intent of the original legislation for design and development of the PRNS, the scope and magnitude of these activities should be removed.

Sincerely,  
Jennifer Scull  
[jenscull@yahoo.com](mailto:jenscull@yahoo.com) [your location will go here]

**From:** [Marie Young](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:29:19 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Methane and GHG release from cattle operations is a leading cause of our climate crisis. I ask the Commission to not condone the impact of this destructive industry in our coastal zone, as it is time to do everything we can to fight climate change.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Marie Young  
[marieriverwalker@gmail.com](mailto:marieriverwalker@gmail.com) [your location will go here]

**From:** [Karen Kravcov Malcolm](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:29:14 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Karen Kravcov Malcolm  
kkmalcolm@msn.com [your location will go here]



**From:** [Jim Steitz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:29:12 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

I respectfully request the Commission to do the right thing, and withdraw your approval of CD-0006-20.

Sincerely,  
Jim Steitz  
[jimsteitz@mac.com](mailto:jimsteitz@mac.com) [your location will go here]

**From:** [D Schoech](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:29:11 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
D Schoech  
[dschoech@sbcglobal.net](mailto:dschoech@sbcglobal.net) [your location will go here]

**From:** [David Lowe](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:29:07 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
David Lowe  
[swedish\\_chef\\_dave@yahoo.com](mailto:swedish_chef_dave@yahoo.com) [your location will go here]

**From:** [Summer Kozisek](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:29:06 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Summer Kozisek  
lazymoose2001@yahoo.com [your location will go here]

**From:** [Tracey Aquino](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:28:26 PM

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Dear California Coastal Commission ,

It is imperative that we fight to protect our waterways that drain into the bays and beaches of the Pacific Ocean, to protect the air quality that is along our Coastal zone, and the native wildlife that should be able to live without the risk of being killed by the NPS. Please help the public protect our natural resources in PRNS by voting against the NPS' plan B.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Kindly act in the best interest of the public good.

Sincerely,  
Tracey Aquino  
[traceyaquino@gmail.com](mailto:traceyaquino@gmail.com) [your location will go here]

**From:** [Carter Neal](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:28:24 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Since the Commission came within one vote of rejecting the NPS's request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS's track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
Carter Neal  
cartercamden@live.com [your location will go here]

**From:** [j M](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:28:23 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest "the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available." And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
j M  
maurer@fioptics.com [your location will go here]

**From:** [Carlene Visperas](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:28:19 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Carlene Visperas  
[cinkies@yahoo.com](mailto:cinkies@yahoo.com) [your location will go here]



**From:** [Nancy Schultz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:28:18 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

The CCC should not approve of a Climate Action Strategy from the NPS that can’t prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

It is of great concern politicians at the local and federal level support the NPS’s actions to cull free-ranging Tule elk in PRNS. I visit PRNS for the sole reason to see Tule Elk, and not domestic cattle. Please prioritize native Tule Elk over private ranching operations in our National Park on the California coast.

The CCC’s mission is to protect and enhance the California coast. It reads “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.”

Per the CCC’s mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,

**From:** [Vesna Glavina](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:28:17 PM

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Dear California Coastal Commission ,

I am writing to request the CCC to withdraw their conditional approval of the environmentally destructive plan, CD-0006-20. The significant impact to water quality, air quality and our native Tule Elk, caused by ranching operations, should not be condoned nor allowed to continue.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

In this time of extreme climate disruption, we all need to do everything we can to stop global warming. Livestock emissions – from manure and gastroenteric releases – account for roughly 32 per cent of human-caused methane emissions. Over a 20-year period, it is 80 times more potent at warming than carbon dioxide. The cows in PRNS produce over 6 ½ times the GHGs what all the 2 million plus visitors and their cars do. Any rational climate action strategy – that isn't just a greenwashing vehicle – will require the elimination of cows from the seashore. No plan or strategy should be accepted by the CCC as viable that doesn't remove the cows from Pt. Reyes.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

Please consider these matters, and act accordingly, and in the best interest of our environment and future generations to come.

Sincerely,  
Vesna Glavina  
[vglavina@hotmail.com](mailto:vglavina@hotmail.com) [your location will go here]

**From:** [Patricia Maddalena](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:28:14 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

Re-wilding Point Reyes is the best climate action plan. Why do we need to replace coastal prairies and wilderness that are proven to be the most effective carbon sinks with experimental unproven so-called "carbon farms"?

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The Commission has the opportunity to oppose what is essentially a foregone conclusion arranged at the federal level, in which the people and the environment suffer for the benefit of industry. I urge the Commission to withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Patricia Maddalena  
patmaddalena@hotmail.com [your location will go here]

**From:** [Claire Bush](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:28:10 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

The Voeller paper (2021) states 'fecal indicator bacteria concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in the study watersheds.' The Voeller paper also states that adding subsequent BMPs do not benefit water quality. Therefore, it is clear, from current water quality data from concerned citizens, that water quality in PRNS will not meet necessary standards until tenant cattle operations are removed from our National Park.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let's restore our National Seashore

Sincerely,  
Claire Bush  
vychumspg@hotmail.com [your location will go here]

**From:** [Linda Bescrypt](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:28:06 PM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Linda Bescrypt  
sadie8882@gmail.com [your location will go here]

**From:** [Kate Kenner](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:27:00 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Kate Kenner  
faunesiegel@gmail.com [your location will go here]

**From:** [Julie Harris](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:58 PM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

The CCC should not approve of a Climate Action Strategy from the NPS that can’t prove demonstrable positive results. Claims of “regenerative ranching” or “carbon farming” cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Kindly act in the best interest of the public good.

Sincerely,  
Julie Harris  
[jrhjrh13@gmail.com](mailto:jrhjrh13@gmail.com) [your location will go here]

**From:** [Nicolas Dunn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:56 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Nicolas Dunn  
nduong1@irf.com [your location will go here]



**From:** [Holly Crawford](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:54 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Holly Crawford  
[hollycrawfordb@hotmail.com](mailto:hollycrawfordb@hotmail.com) [your location will go here]

**From:** [Sally Sheck](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:48 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true

regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Sally Sheck  
sallydmander@yahoo.com [your location will go here]

**From:** [Leslie Lazzo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:45 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Please protect the native tule elk from being culled in our National Seashore.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Leslie Lazzo  
freebirdLJean@gmail.com [your location will go here]

**From:** [Sean Harper](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:45 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement "best practices," water quality at PRNS remains poor.

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO2/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO2/year in PRNS is to remove all cattle ranching from these public lands.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Sean Harper  
sph0125@live.com [your location will go here]

**From:** [Margaret Petkiewicz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:39 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

Kindly act in the best interest of the public good.

Sincerely,  
Margaret Petkiewicz  
peckos@comcast.net [your location will go here]

**From:** [Sandra Couch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:38 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Sandra Couch  
sndrcch@yahoo.com [your location will go here]

**From:** [Marilyn Martin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:37 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The NPS' plan allows the slaughter of our free-ranging native Tule Elk in PRNS. This is not ethical, nor legal, as this endemic species is protected in California. Tule Elk must be prioritized over commercial cattle operations in our National Seashore.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Marilyn Martin  
MarilynLMartin@msn.com [your location will go here]



**From:** [Denise Sammartano](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:36 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Denise Sammartano  
dcp3652@hitmail.com [your location will go here]

**From:** [Anna Givens](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:33 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Anna Givens  
[annahg@sonic.net](mailto:annahg@sonic.net) [your location will go here]

**From:** [Louise Slattery](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:28 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Louise Slattery  
[leslattery@aol.com](mailto:leslattery@aol.com) [your location will go here]

**From:** [Sue Hall](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:27 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

ING STATEMENT (50):

In the past 12 months, a number of large trash dumps which have existed in the park for years, hidden bulldozing of an anadromous fish streambank by a rancher, leaky or failed ranch septic systems and numerous instances of ranchers violating the terms of their leases with impunity all point to willful neglect, if not downright abrogation of duty, by the NPS. Based on the NPS's extensive past history, the Commission can expect more of the same. It's important that the Commission recognize the entrenched pattern and rescind the finding of Consistency Determination CD-0006-20.

Sincerely,  
Sue Hall  
otterone77@aol.com [your location will go here]

**From:** [Kellen Dunn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:25 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

US Methane emissions from livestock and natural gas are nearly equal.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Kellen Dunn  
snobunnie1992@yahoo.com [your location will go here]

**From:** [russ ziegler](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:21 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Cows produce 150 billion gallons of methane per day.

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

Please act boldly to revoke the conditional concurrence. Despite overwhelming evidence of water pollution, bulldozing of natural habitat, toxic dumps from ranches threatening marine sanctuaries, the NPS continues to neglect its duty to preserve and protect a National park. We are counting on you to hold them accountable.

Sincerely,  
russ ziegler  
[russziegler2003@yahoo.com](mailto:russziegler2003@yahoo.com) [your location will go here]

**From:** [Sharon Longyear](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:19 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

The cattle in PRNS produce six and half times the greenhouse gases that the two million-plus visitors and their cars do each year. As our world is being consumed by mega-fires, extreme drought and vanishing water supplies, it's time to phase out the largest air pollution source in our seashore: cattle ranches and dairies. No climate action plan or strategy can alter this reality. It's past time for the cows to be removed from the seashore.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Sharon Longyear  
[sharonmlongyear@gmail.com](mailto:sharonmlongyear@gmail.com) [your location will go here]

**From:** [michelle Brownlee](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:18 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

The extreme and dangerous levels of water pollution cannot be mitigated with best management practices (BMPs). The SF water quality board has determined that some of the mitigation measures are "technically or financially infeasible" and "in the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS"

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,



**From:** [Carol Collins](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:17 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC’s requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS’s General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Carol Collins  
ccollins54@msn.com [your location will go here]

**From:** [Kathy Kelly](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:14 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

Cattle manure from both beef and dairy operation, has significant impact on the multiple waterways in the watersheds in PRNS. Even if cattle are fenced out of waterways and riparian areas, during the rainy season, the precipitation moves the manure downhill, and into our waterways. No best management practices can stop this from occurring.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

I hope that the CCC will do whatever it can to remedy the situation.

Sincerely,  
Kathy Kelly  
[kasiabkelly@gmail.com](mailto:kasiabkelly@gmail.com) [your location will go here]

**From:** [Fred Granlund](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:26:08 PM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term ‘clean coal’ used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS’ purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California’s endemic Tule elk.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS’ plan

Sincerely,  
Fred Granlund  
[fgranlund@yahoo.com](mailto:fgranlund@yahoo.com) [your location will go here]

**From:** [Linda Berger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:25:10 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Due to the NPS' plan to cull free-ranging Tule Elk and the significant die-offs of Tule Elk held captive behind an eight foot fence without sufficient water and forage, I urge the Commission to withdraw your conditional approval provided to the NPS' plan (CD-0006-02).

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Linda Berger  
[linda@dnstexas.com](mailto:linda@dnstexas.com) [your location will go here]

**From:** [Caroline Boston](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:25:08 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Caroline Boston

**From:** [Betty Kissilove](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:25:00 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

The free-ranging Drakes Beach Tule elk herd at least have access to water, as they are located in an area of the National Park with a few watersheds. However, the watersheds in PRNS are polluted with high levels of bacteria from cattle manure, which will cause Johne's disease in our Tule Elk. Please end ranching in PRNS, in order for our Tule Elk, other wildlife and aquatic life, to have access to clean water.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Betty Kissilove  
[cacaogal@gmail.com](mailto:cacaogal@gmail.com) [your location will go here]

**From:** [Jim Petkiewicz](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:59 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

I urge the Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,  
Jim Petkiewicz  
peckos@me.com [your location will go here]

**From:** [Kenneth Gibson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:55 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Kindly act in the best interest of the public good.

Sincerely,  
Kenneth Gibson  
[kennethtgibson@gmail.com](mailto:kennethtgibson@gmail.com) [your location will go here]



**From:** [Laurel Collins](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:53 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
Laurel Collins  
[laurelgene@comcast.net](mailto:laurelgene@comcast.net) [your location will go here]

**From:** [Javier Reza](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:53 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

“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.”

Our free-ranging elk are being managed by the NPS through culling. And the free-ranging elk have to learn to survive in PRNS by eating non-native annual grasses planted by the tenant ranchers, vs the elk having native vegetation which they evolved with. It is time to remove the cattle to give our Tule elk the freedom to roam without the risk of being killed, and to restore the native vegetation which is what the Elk should have access to.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS’ plan (CD-0006-02 ).

Sincerely,  
Javier Reza  
[jreza@cruzio.com](mailto:jreza@cruzio.com) [your location will go here]

**From:** [Beth Stanberry](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:49 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

The NPS noted in their March 4, 2022 letter – “At this time, the NPS does not intend to initiate reduction of the Drakes Beach herd to a population threshold of 140 individuals.” This is an atrocious statement on many levels. The NPS threw out an arbitrary number of 140 (was 120), and there is no biological, ecological rationale for this number. NPS personnel should be focused on science to support the natural resources on public lands, and not focus on the will of the ranching tenants.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,  
Beth Stanberry  
rdtrtle@gmail.com [your location will go here]

**From:** [Jennifer Kelly](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:48 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

Upon close reading of the EIS for the GMPA, it's clear that ranch operations cannot continue if clean waters are to be achieved in the park. For a ranch to be economically functional requires a minimum number of cows, and that number will produce so much manure, it will have to be spread on the land, where it will inevitably run off into the local waterways. That runoff has been shown to contaminate the waterways with levels of e. coli, enterococcus and other bacteria far beyond safe levels, despite the applications of BMPs. For clean water, private cattle operations must be removed from PRNS.

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Jennifer Kelly  
je2niferk@att.net [your location will go here]

**From:** [Sharon PORTER](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:45 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

Even if the NPS presents an action plan at the upcoming hearing to address the Commission's concerns regarding water pollution, air quality issues and appropriate tule elk management, it cannot be trusted to actually implement it. The perfect example of this is NPS's refusal to monitor known polluted waterways since 2013. It was private citizens, concerned about excessive and dangerous bacterial levels in Kehoe Lagoon, Abbotts Lagoon and other locations that tested the waters in 2021, at their own expense. As expected, contamination rates significant and harmful to public health and aquatic health. Did the NPS restart testing then? No, they did not. They have consistently ignored the public's outcries demanding they take action. NPS cannot be trusted to fulfill its duties to protect our park and the public's resources.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Sharon PORTER  
ssporter43@gmail.com [your location will go here]

**From:** [Maggie Frazier](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:42 PM

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Dear California Coastal Commission ,

California has always been a leader in passing regulations for environmental standards that are resisted by private interests. Within the Point Reyes coastal zone you have the power to enforce the state water quality standards to protect a natural resource from private ranching interests and hold a federal agency accountable. I urge the Commission to revoke your conditional approval of CD-0006-02.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Per the NPS’ own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
Maggie Frazier  
mfrazier74@hotmail.com [your location will go here]

**From:** ["Gérard COUCHOUD"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:40 PM

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Dear California Coastal Commission ,

In the midst of a pandemic when the general public needs to have the ability to enjoy clean air, clean water, and enjoy watching the iconic Tule Elk, I urge the Commission to not support the NPS plan which will extend and expand the destructive cattle operations in PRNS.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels of E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact on marine life in the ocean.

Cattle ranching generates high levels of methane – independent scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS' plan (CD-0006-02 ).

Sincerely,  
Gérard COUCHOUD  
couchoud.gerard@wanadoo.fr [your location will go here]

**From:** [Jennifer Kelly](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:38 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

Over the last decade, California has lost a significant percentage of the remaining Tule Elk due to the NPS’ purposeful culling of free-ranging herds in PRNS, and the horrific deaths of the Tule elk held captive in the Elk Preserve due to lack of sufficient water and forage. This is wrong, as the sole cause on the loss of Tule elk in PRNS is the prioritization of tenant cattle ranching over California’s endemic Tule elk.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS’ plan.

Sincerely,  
Jennifer Kelly  
[je2niferk@att.net](mailto:je2niferk@att.net) [your location will go here]



**From:** ["Armando A. Garcia"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:31 PM

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Dear California Coastal Commission ,

Kindly consider the problems with how our National Park Service is operating Point Reyes National Seashore.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

"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."

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Armando A. Garcia  
mondopwr@aim.com [your location will go here]

**From:** [Timothy Mullen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:25 PM

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Dear California Coastal Commission ,

Having read that the National Park Service wanted more time to come up with the simple mitigation plans the Commission required as a condition of approval for Consistency Determination CD-0006-20, it seems to me that the NPS's priorities continue to be misplaced. The NPS should be focused on the significant air and water pollution caused by tenant cattle ranchers, as well as protecting our native Tule Elk.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

Tule elk naturally roam and graze lightly, which allows them to coexist with the native plants at Point Reyes. But the cows move less and eat everything down to the ground, which kills the native plants and causes erosion and other ecological problems. Cattle are impacting our Tule elk, the quality of air, and quality of water in PRNS.

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Timothy Mullen  
[mullentim13@yahoo.co.uk](mailto:mullentim13@yahoo.co.uk) [your location will go here]

**From:** [Lynette Ridder](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:20 PM

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Dear California Coastal Commission ,

I urge the Commission to withdraw the conditional approval of the NPS' plan as we must end the constant environmental damage occurring in our National Seashore caused by private cattle operations.

In their letter dated March 4, 2022 the NPS says a delay in submitting plans to the CCC is necessary because they have delayed issuance of leases. Issuing leases has no bearing on preparing a water quality sampling plan but by falsely linking these two issues the National Park Service seeks to control the schedule.

I urge the Commission to perform due diligence on the Climate action plan to be submitted by the NPS. Regenerative ranching and carbon sequestration are new terms utilized by the Ag industry that is equivalent to the term 'clean coal' used by the coal industry. Cattle operations are destructive to the land, and air on many levels, and are a major cause of our climate crisis.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Lynette Ridder  
captain\_nerful@yahoo.com [your location will go here]

**From:** [Sylvia Vairo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:17 PM

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Dear California Coastal Commission ,

Regarding the Coastal Commission's upcoming hearing on Agenda Item 18a, conditional Consistency Determination CD-0006-20 for the National Park Service's General Management Plan Amendment, I find it galling the claim the NPS cannot provide a water pollution control plan, an air pollution control plan, and a report on free-roaming tule elk herds management, as required by the CCC, because they are being sued. The lawsuit challenges the basis for their Record of Decision to make permanent the private, for-profit ranches that despoil our park. It does nothing to prevent them from doing what they should have been doing all along: testing the park's waters for cattle-caused fecal and other pollution, reducing or removing cattle where such pollution cannot be abated, and making ranchers who harm the public's resources fix the problems they've caused.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on "best management practices", but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Sylvia Vairo  
[sylviavairo@yahoo.com](mailto:sylviavairo@yahoo.com) [your location will go here]

**From:** [Jennifer Kelly](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:17 PM

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Dear California Coastal Commission ,

I am writing the Commission to request to do whatever it can to protect and restore wilderness at Point Reyes National Seashore.

CCC staff has already determined that the GMPA is not consistent with the coastal act policies related to protecting marine resources (Section 30230) and water quality (Section 30231). You have the statutory mechanisms to object to this concurrence. Please do not settle for anything less than holding concurrence until adherence to state standards of water quality is achieved.

The United Nations states, “The sustainable use of land, soil, water and energy for food contributes to greenhouse gas emissions that cause rising temperatures.” During the April 2021 CCC meeting, the NPS stated they will partner with Marin County initiatives to address the climate impact caused by cattle ranching operations in our National Park.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Jennifer Kelly  
je2niferk@att.net [your location will go here]

**From:** [Phillip Mitchell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:09 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

The NPS has not performed surface water quality testing since 2013, even though prior NPS data, and data from concerned citizens and environmental organizations have documented the significant levels of pollution in drainages in PRNS that flow into the Pacific Ocean. The high levels are E.coli and Enterococcus not only are a public health issue, but also detrimental to aquatic life in the waterways and will have an impact to marine life in the ocean.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

The NPS is being sued because the NPS' Plan is violating the NPS' own Organic Act, the Clean Water Act, the Point Reyes Act, and NEPA policy. I urge the Commission to remove your conditional approval, and find the NPS' plan inconsistent with the Coastal Act.

Sincerely,  
Phillip Mitchell  
psmyeolus@aol.com [your location will go here]

**From:** ["Lily Lau-Enright"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:06 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

Native Tule Elk are a protected species in California, and domestic cattle raised for private, for-profit endeavors are not.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Lily Lau-Enright  
lilomama@gmail.com [your location will go here]

**From:** ["Javier Rivera-Diaz"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:05 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Javier Rivera-Diaz  
javierocker@aol.com [your location will go here]



**From:** [Kevin Vaught](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:24:02 PM

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Dear California Coastal Commission ,

The National Park Service (NPS) was to provide a water quality strategy, a climate action strategy, and an update on the free-ranging Tule Elk to the Coastal Commission within 12 months of April 2021, however the NPS staff at Point Reyes National Seashore requested to extend their commitment. The NPS inaction on ongoing critical issues in our National Park on the California coast is unacceptable. I urge the Commission to withdraw your conditional approval for CD-0006-02.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Kevin Vaught  
klvaught@bellsouth.net [your location will go here]

**From:** [Glenda Corning](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:58 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

The McClure Dairy, on the I Ranch parcel, ended their dairy operations in the summer of 2021, for multiple reasons: there is an organic milk glut, the natural spring on the leased parcel ran dry, and the rancher wants to retire. However, even with the removal of approximately 600 dairy cows, 150 heifer remain as the rancher wants to keep the lease, but the water quality continues to be impacted from the cattle manure on the land.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
Glenda Corning  
[glenda@meadowsweetdairy.com](mailto:glenda@meadowsweetdairy.com) [your location will go here]

**From:** [Lisa Jacobson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:54 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

NPS has not done water quality tests there since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The 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. Please note this level of pollution, caused by cattle manure, occurs even after the NPS and ranchers implemented over 30 best management practices and 170 management activities over the last 20 years to improve water quality in Point Reyes National Seashore.

Beef and dairy operations are well known to be leading causes of climate change, so they don't belong in a national park. At PRNS, overgrazing has removed the natural root system of the coastal prairie plants, which was a natural carbon sink. No amount of "regenerative grazing" (a debunked concept) will ever bring that root system back. Only the removal of cattle will restore carbon into the earth.

I am offended by the idea that native tule elk must be "culled" because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Lisa Jacobson  
sheltergate@gmail.com [your location will go here]

**From:** [Kevin Davis](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:53 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Kevin Davis  
kevin.davis56@yahoo.com [your location will go here]

**From:** [V Robert Wallace](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:50 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

No climate action strategy will address the horrific air pollution that is caused by private cattle ranching in PRNS. Per the NPS' own EIS, 24,000 metric tons of GHG are released into the air because of cattle operations. This is not acceptable in the midst of climate change, and in a National Park.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

California is running out of water, extractive industries are impacting the quality of air, and we are losing wildlife on a daily basis. Let's use Point Reyes National Seashore as a model for 30 x 30 and remove destructive ranching from our public land. Please revoke your conditional approval, and vote No to the NPS' Plan B as it is not consistent with the Coastal policies in California

Sincerely,  
V Robert Wallace  
last1le@yahoo.com [your location will go here]

**From:** [gina.colangelo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:49 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

As a frequent visitor to Point Reyes National Seashore I am appalled that our National Park Service allows ranchers to use the creeks and streams as open sewers for their cow manure. The disease-causing bacteria in cow feces and human feces are the same. Should we allow humans to defecate in Drakes Estero and Abbots Lagoon?

Grazing, is analogous to mining, logging, or drilling on public land, in that these processes can only degrade and deplete not protect. Before committing your key decision on unproven methods proposed by vested interest, please consider that the simplest, proven and cost-effective way to address climate change is to just let Point Reyes be a National Park.

The National Park Service (NPS) continues to fail the public, our environment and our native wildlife, especially our Tule Elk. Our Drakes Beach herd is now at 151 free-ranging animals, and the NPS has the ability to kill the Tule elk to reduce an arbitrary number of 140 – there is absolutely no science behind this number.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
gina.colangelo  
ginamarieco@gmail.com [your location will go here]

**From:** [Samuel Durkin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:45 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

I want to thank the Commission for the opportunity to provide public comments. I no longer want to see nor hear of the continual impact of ranching on my public land. Please hold the NPS accountable, and vote against the NPS' plan. The impacts of ranching in PRNS is well documented in the NPS' own EIS - ranching must end in PRNS.

Sincerely,  
Samuel Durkin  
samussr337@hotmail.com [your location will go here]

**From:** [Andrew Arneson](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:42 PM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Andrew Arneson  
ajarneson@hotmail.com [your location will go here]



**From:** [Adelina Jaudal](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:40 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

No amount of "best practices" will ever stop beef and dairy operations from being a villain in the struggle against climate change.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Adelina Jaudal  
[ajaudal@yahoo.com](mailto:ajaudal@yahoo.com) [your location will go here]

**From:** ["Kia H."](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:36 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore (PRNS) needs more agencies to help save and protect our public land from the constant impact caused by tenant cattle operations on 1/3 of our Park. Please partner with me and other environmental organizations, and withdraw your support from the NPS Plan.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johnes disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

Please withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Kia H.  
[hendrixk@ufl.edu](mailto:hendrixk@ufl.edu) [your location will go here]

**From:** [Judy Sylvester](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:34 PM

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Dear California Coastal Commission ,

Our environment and wildlife in PRNS is worth saving, therefore I kindly ask the Commission to prioritize our National Park over tenant cattle ranching, and revoke your conditional approval of the NPS' plan.

NPS had decades to fix the water quality issue and their solution was to stop testing. They are still not serious about solving this issue since they are asking for an extension to provide a water monitoring strategy. With the federal consistency review the California Coastal Commission has an important responsibility to bring adherence to state water quality standards. CCC should hold the concurrence till NPS has fixed this issue.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Tule elk are native to this region, but domestic cattle are not. It is unfathomable the NPS' plan will allow culling of our native species to benefit a handful of highly subsidized ranchers that are running their commercial businesses in a National Park. This is not appropriate.

As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I truly thank the CCC for holding the NPS accountable, and respectfully ask the Commission to withdraw your conditional approval of the NPS plan, as the plan will continue to impact our waterways, our air quality, our native wildlife and native vegetation.

Sincerely,  
Judy Sylvester  
[gardennotes@gmail.com](mailto:gardennotes@gmail.com) [your location will go here]

**From:** [Nancy PEARLMAN](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:30 PM

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Dear California Coastal Commission ,

As a citizen who enjoys public parks, I want commercial ranching at Point Reyes National Seashore to be discontinued, therefore I urge the Commissioners to withdraw their conditional approval of the NPS' plan CD-0006-20

A 36,000 sq foot loafing barn, a massive concrete structure, was allowed to be built on I Ranch in 2004 on the hills along the Pacific coast, to reduce the high level of bacteria in Abbotts Lagoon located downhill from a dairy operation. However, data from January 2021, notes water flowing downhill from the McClure dairy and into Abbotts Lagoon, exceeded E. coli limits by a factor of 20 and enterococci limits by a factor of 60. Loafing barns are considered a best management practice (BMP) to address water pollution in PRNS, however this is a prime example noting loafing barns are not improving water quality to meet the safe criteria.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS' and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS' plan, and find the plan not consistent.

Sincerely,  
Nancy PEARLMAN  
ECNP@aol.com [your location will go here]

**From:** [Joseph Boone](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:28 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The Commission's post-hearing letter of May 10th, 2021, to Supt. Kenkel gave clear and specific direction to the NPS on how to structure a water quality monitoring program designed to address the degraded and polluted condition of the seashore's waters, as well as a Climate Action Plan and to report on the status of the tule elk herds. For Supt. Kenkel to request an extension to the CC's deadline smacks of bureaucratic foot dragging. The Commission must not budge on its NPS performance requirements.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

It is distressing to know the National Park Service (NPS) has the ability to cull free-ranging Tule Elk in a National Park to support the demands of cattle ranching tenants.

The CCC's mission is to protect and enhance the California coast. It reads "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."

Per the CCC's mission statement and the data available to the CCC documenting the significant environmental impact to our waterways in PRNS, including the NPS intent to cull our wildlife for private commercial ranching, I request the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) in order to protect the natural resources on our public lands.

Sincerely,  
Joseph Boone  
jboone@calpoly.edu [your location will go here]

**From:** [Tressa Reisberg](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:26 PM

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Dear California Coastal Commission ,

Private cattle operations on 1/3 of our public land in PRNS, is not an appropriate use of land in a coastal zone for multiple reasons. For the April 7 CCC meeting, I urge the Commission to revoke the conditional approval of the NPS plan, on the basis of ongoing pollution of our waterways, significant levels of methane released into the atmosphere on a daily basis, and the culling of elk.

Despite finding very high fecal bacteria levels at Point Reyes National Seashore, the NPS decided to stop monitoring surface water in 2013. The NPS justifies this neglect by saying they would rather spend our tax dollars on “best management practices”, but water sampling conducted after these BMPs were constructed show continued risk to human health and wildlife from bacteria and excessive nutrient and sediment loading.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

I urge the Commission to not support the NPS’ plan to cull native Tule elk in PRNS.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS’ plan

Sincerely,  
Tressa Reisberg  
[tressamarie.vegan@gmail.com](mailto:tressamarie.vegan@gmail.com) [your location will go here]

**From:** [Kevin Vaught](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:23 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

The successful rescue of the tule elk species from the brink of extinction is a signal achievement of the National Park Service. Elk in Point Reyes provide a significant tourist attraction and natural feature in the park. Confining, hazing, and culling these animals for the sake of private commerce on public land is antithetical to the intent of National Parks.

The impacts of ranching in PRNS is well documented in the NPS’ own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Kevin Vaught  
klvaught@bellsouth.net [your location will go here]

**From:** [Susan Berzac](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:20 PM

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Dear California Coastal Commission ,

As a concerned citizen over the environmental health of our National Park in Marin County, I urge the Commission to withdraw your conditional approval for CD-0006-02.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

Thank you for the opportunity to provide the public to share our concern. Based on continual delays by the NPS to appropriately manage our National Seashore, the public urges the Commission to withdraw your conditional approval of CD-0006-02.

Sincerely,  
Susan Berzac  
spberzac@comcast.net [your location will go here]



**From:** [Anne Parzick](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:16 PM

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Dear California Coastal Commission ,

For the sake of the health of the ecosystems in PRNS, I urge the Commission to rescind your conditional approval of CD-0006-20, and find the NPS' plan inconsistent with the Coastal Act.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

Regarding regenerative ranching and carbon farming, if you research these topics, you see two basic sets of results: industry results (including certain universities with industry funding) which emphasize high-end potential benefits but without peer-reviewed, repeatable, convincing science, and independent bodies such as the U.N.'s Intergovernmental Panel on Climate Change which are more realistic and deflationary. These approaches are more and more recognized as a green-washing attempt, along the lines of "Clean Coal." I ask the Commission to perform research on the published articles available many of which documents the lack of benefit to address the climate crisis.

Tule elk have a remarkable history, having been brought back from the brink of extinction. Their presence at Point Reyes is proof that positive change is possible. NPS policy, which favors commercial livestock over wildlife, doesn't reflect the values of those who created the park.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Anne Parzick  
[alw4@sbcglobal.net](mailto:alw4@sbcglobal.net) [your location will go here]

**From:** [Yves Decargouet](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:16 PM

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Dear California Coastal Commission ,

I have been a long-time advocate for removing the private, for-profit ranches from our National Seashore. Regarding Agenda Item 18a (CD-0006-20), it's no surprise the National Park Service is trying to weasel out of their responsibilities to ensure those ranches stop damaging what should be a pristine environment held in trust for all people today - as well as future generations - to enjoy and cherish. The NPS has acted mostly as the agents and advocates for cattle ranchers who, having been paid fair market value for the land, should have departed the park decades ago. It's my sincere hope that the Commission will hold the NPS to its commitments – or reverse Consistency Determination CD-0006-20.

Water quality data shared for public review, and local, state and federal review, clearly documents significant levels of pollution in our waterways that flow into the Pacific Ocean, all caused by commercial cattle ranching operations that lease parcels in PRNS. It is unclear why this level of pollution continues to be condoned. As a visitor to PRNS, this is unacceptable.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

I urge the Commission to not support the NPS' plan to cull native Tule elk in PRNS.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Yves Decargouet  
[countzero100@gmail.com](mailto:countzero100@gmail.com) [your location will go here]

**From:** ["Heather Walker-Dale"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:12 PM

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Dear California Coastal Commission ,

As one who is proud and awestruck by the unique California coastline and biodiversity, especially in Point Reyes, I would like to thank you for your efforts to protect the only National seashore on the West coast.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don't even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

PRNS beef and dairy operations cause climate change, both through the consumption of living plant matter (carbon) and through the emission of methane. Methane emission in particular has increased during the past few decades, because cow manure in their modernized operations is stored, rather than aerobically composted.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Heather Walker-Dale  
arydonis@hotmail.com [your location will go here]

**From:** [Marjorie Angelo](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:08 PM

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Dear California Coastal Commission ,

I ask the Commission to no longer support the NPS' plan to expand and extent destruction cattle operations on our California coast in PRNS. Nothing in this plan will provide the protection of water, air and native wildlife on our public land. It is time to end the leasing of 1/3 of our National Park to commercial ranching operations, and return it to the public and all wildlife to enjoy.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive "methane digesters" have limited effectiveness, and only mitigate a problem which shouldn't even exist at a national park.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
Marjorie Angelo  
[joliecoeur@bellsouth.net](mailto:joliecoeur@bellsouth.net) [your location will go here]

**From:** [Amy Dozier](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:06 PM

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Dear California Coastal Commission ,

I am urging the Commissions to rescind their conditional approval of the environmentally destructive NPS plan CD-0006-02. Our National Seashore, located on the California coast line, deserves to be without commercial ranching operations that impact our public land.

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

Assuming the NPS' strategy on Climate Action includes regenerative ranching and carbon sequestering as a means to combat climate change the California Coastal Commission should be aware that the claims of regenerative ranching and carbon sequestering are far from proven. In an article by J. Dutkiewicz and G.N. Rosenberg "The Myth of Regenerative Ranching (Sep. 23, 2021) the authors debunk the notion that regenerative ranching can hold answers to limiting the impact of dairy and cattle on climate change. They note a study done by Oxford scholars in 2017 found that grass-fed livestock "does not offer a significant solution to climate change as only under very specific conditions can they help sequester carbon. This sequestering of carbon is even then small, time-limited, reversible and substantially outweighed by the greenhouse gas emissions these grazing animals generate." The California Coastal Commission should be fully informed of all of the arguments, both for and against these practices before agreeing to NPS' strategy.

It is the native Tule Elk that bring people from all over the Bay Area, and the US to see these majestic animals in our National Park. Please help protect them from the culling by the NPS.

The impacts of ranching in PRNS is well documented in the NPS' own EIS therefore we must end commercial ranching in PRNS. Please withdraw your conditional approval.

Sincerely,  
Amy Dozier  
kissyboots5983@aol.com [your location will go here]

**From:** [Alexandria Luostari](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:23:06 PM

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Dear California Coastal Commission ,

On April 22, 2021, the Commission conditionally concurred in a vote of 5-4 with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA). For the upcoming meeting on April 7, I respectfully request the Commission to revoke your conditional approval.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Please rescind your conditional concurrence, and help us protect our native Tule Elk, our landscape, our waterways in PRNS.

Sincerely,  
Alexandria Luostari  
[Alexandria.luostari@gmail.com](mailto:Alexandria.luostari@gmail.com) [your location will go here]

**From:** [John Beck](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:22:13 PM

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Dear California Coastal Commission ,

I am passionate about protecting our National Parks and coastal zones for public use. Therefore I am writing to request the California Coastal Commission to reassess and revoke your conditional approval of the NPS plan, based on water quality data available documenting the significant pollution occurring in the watersheds that drain into the Pacific Ocean, the constant impact of methane released into the atmosphere by private cattle operations, and the culling of native Tule elk in PRNS.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

The NPS says it will develop a plan to address the methane pollution caused by the cattle in PRNS, but there is no plan that can effectively do that, other than removal of virtually all the cows. Even methane digesters don't capture the belches and farts cows emit, so there will continue to be excessive damaging air pollution in PRNS as long as there are more than just a very few cows there. When one thinks about how PRNS could be the shining example of President Biden's desperately needed 30 X 30 rewilding program, it becomes clear that continued destructive ranching is the last activity that should be allowed in the park.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

We need to keep methane out of the air, manage our limited water supply and protect our wildlife, in the midst of climate change and a biodiversity crisis. I urge the Commission to revoke your conditional approval on the NPS' plan and help us save our Seashore.

Sincerely,  
John Beck  
skymonkey1955@yahoo.com [your location will go here]

**From:** [elizabeth mostov](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:22:06 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
elizabeth mostov  
li\_dode@yahoo.com [your location will go here]



**From:** ["H. Lehman Holder"](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:58 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS’ plan (CD-0006-02)

Sincerely,  
H. Lehman Holder  
[tripsguy@aol.com](mailto:tripsguy@aol.com) [your location will go here]

**From:** [Rohana Wolf](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:55 PM

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Dear California Coastal Commission ,

I am writing to urge the California Coastal Commission to reconsider its finding of the Point Reyes National Seashore General Management Plan Amendment as conditionally compliant with the Coastal Act.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Per the NPS' own Environmental Impact Statement, it notes that ranching in the park generates the equivalent of 24,000 metric tons of CO<sub>2</sub>/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors to PRNS. These emissions are over 60% of overall park emissions, and 21% of countywide agriculture emissions. The only way to effectively end the 24,000 metric tons of CO<sub>2</sub>/year in PRNS is to remove all cattle ranching from these public lands.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public's vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don't miss this opportunity. Do what's right and rescind Consistency Determination CD-0006-20. I thank you.

Sincerely,  
Rohana Wolf  
[simarohana@gmail.com](mailto:simarohana@gmail.com) [your location will go here]

**From:** [casee maxfield](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:52 PM

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Dear California Coastal Commission ,

I request the Coastal Commission to revoke their Conditional Concurrence it issued in April 2021 for CD-0006-20 due to lack of management of the National Park Service of the documented, and ongoing issues on water quality, climate impact, and culling of free-ranging Tule Elk.

Despite efforts by National Park Service (NPS) to implement best practices (specifically over 170 of them- reference NPS's :General Management Plan Amendment Record of Decision, pg. 97) water quality remains to be a high concern. Western Watershed press released noted that "water sampling from Kehoe Creek and Abbotts Lagoon on January 27 and 28, 2021, showed that bacteria contamination of surface water dramatically exceeded acceptable water quality standards despite the reported implementation by the park service of waste management actions in drainages impacted by dairy and beef ranches... Bacteria results for the South Fork of Kehoe Creek were 30 times the allowable limit for applicable water quality standards for the bacterium *Escherichia coli* (E. coli) on January 27, and 20 times the limit on January 28. Kehoe Creek drains to Kehoe Lagoon at Kehoe Beach and, with heavy rains, the lagoon flows to the ocean. The Lagoon and the ocean are popular recreational spots with direct human contact, which triggers more stringent water quality criteria. A sample was taken from the Lagoon on January 28 and it exceeded E. coli limits by a factor of 40, and exceeded enterococci limits by a factor of 300 (Enterococcus is another large genus of bacteria)."

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Given the above facts, and the history of the PRNS management catering to the needs of the ranchers over those of the public, it is entirely appropriate for the Commission to revoke its finding of a Consistency Determination. I hope that will be the outcome of the April 7th hearing. Thank you for your consideration.

Sincerely,

**From:** [Patricia Poock](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:49 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

People who visit the beaches and bays of Point Reyes National Seashore may already be getting sick from the fecal bacteria in the water they swim, wade, and kayak in but have no way of knowing the source. The National Park Service knows this, so not only do they not monitor water quality, they don’t even put up warning signs when they know contamination from cattle waste is likely during periods of rain.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore’s GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an ‘off-set’.

The NPS’ plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS’ plan.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS’ plan (CD-0006-02)

Sincerely,  
Patricia Poock  
patan2@hotmail.com [your location will go here]

**From:** [Janet Heinle](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:46 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

It's disingenuous of the NPS to extrapolate ongoing benefits without documented evidence, which is lacking. The lack of water testing by the NPS provides a convenient fig leaf for them to make spurious claims about future "potential" water quality improvements. This "see no evil" attitude may be one reason why the Park Service is failing to provide the Commission with the water and air pollution strategies the CCC has required for its Consistency Determination (CD): no testing = no pollution = no problem to address.

When emissions from land use and land use change are included, the livestock sector accounts for 9 per cent of CO2 deriving from human-related activities, but produces a much larger share of even more harmful greenhouse gases. It generates 65 per cent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Please repeal your conditional approval. It is time for our National Seashore, the only Seashore on the California coast, to be given the opportunity to be restored to a healthy environment by removal of all cattle operations in our public land.

Sincerely,  
Janet Heinle  
[janetheinle@yahoo.com](mailto:janetheinle@yahoo.com) [your location will go here]

**From:** [Jared Cornelia](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:42 PM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

Commercial operations, such as the PRNS dairy and beef ranches, must push for maximum output from within their allotted space, in order to be profitable in a modern competitive market. This explains why those ranches have increased the magnitude and mechanization of their operations, ever since the PRNS was established many decades ago. Excess manure causes surface water contamination, and also problems with runoff into the seashore.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Jared Cornelia

**From:** [Amber Sumrall](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:41 PM

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Dear California Coastal Commission ,

We are in the midst of both a significant climate crisis and biodiversity crisis. One way to help address these catastrophic events is to end the destructive, private ranching in PRNS by withdrawing the conditional approval of the NPS' plan B.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

In conclusion, it is abundantly clear that if allowed, the NPS will continue in its historic pattern and avoid as much as possible holding the ranchers responsible for the damages their operations cause in PRNS. It is only due to the CCC's efforts to protect our environment and hold fast to the California Coastal Act that the public can have any assurances that decades of fecal coliform, enterococcus and other bacterial pollution, excess nutrients, and other forms of water pollution might be reduced or eliminated, that some measures to reduce GHGs in the park might be addressed, and that the native tule elk might not be shot for the benefit of profit-seeking, environmentally-destructive ranchers. Even if the NPS presents belated plans to address the Commission's CD requirements, the issue of NPS reliability still justifies the CCC's withdrawal of its Consistency Determination. We ask that you do that.

Sincerely,  
Amber Sumrall  
[acsumrall@cruzio.com](mailto:acsumrall@cruzio.com) [your location will go here]

**From:** [Dr Kristi Dunn](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:34 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

I urge the Commission to perform your own research reading independent and scientific articles documenting that regenerative ranching and carbon sequestration will have no to minimal benefit on our public land in PRNS.

PRNS is the only national park with tule elk. Currently there are approximately 500 elk in total (with a die-off in progress as of this writing) in the Seashore and about 5,500 cows, and there are about as many cows in the Seashore as there are tule elk in existence.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Dr Kristi Dunn  
[mekrisd@hotmail.com](mailto:mekrisd@hotmail.com) [your location will go here]



**From:** [Arlene Zuckerman](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:28 PM

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Dear California Coastal Commission ,

As an independent quasi-judicial state agency with federal consistency review authority you have the power to hold the park service accountable to the statute of the enabling legislation of Point Reyes act for the “maximum protection, restoration and preservation of the natural environment of the area”. We are counting on you to help us keep the park service accountable.

The National Park Service has not tested the waters of Pt. Reyes National Seashore since 2013, but they claim implementation of “best management practices” (BMPs) have and will continue to reduce water pollution caused by massive amounts of cow manure draining into the park’s waterways and the Pacific Ocean. Please note the high level of pollution in our waterways per the water quality data provided to date. BMPs are not the answer to protect the public, and to protect aquatic and marine life in this coastal zone.

The Climate Crisis is real. Per data provided by the IPCC, we are at the tipping point to address this issue for future generations. Therefore, it is unclear why a highly impactful industry which releases tons of methane into the atmosphere, continues to be allowed in a National Park, when PRNS, located in coastal zone, should be some of the most protected lands. No activity will stop the continual release of methane into our air in PRNS, unless private cattle operations are required to end.

I am opposed to any policy that kills tule elk in favor of private business operations in a public park.

Please stand with the people of the state of California and not private interests. Public opinion is being disregarded, we need your help in getting heard.

Sincerely,  
Arlene Zuckerman  
arlenenyc@hotmail.com [your location will go here]

**From:** [Stephanie Trasoff](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:27 PM

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Dear California Coastal Commission ,

I am concerned about the ongoing mismanagement of Point Reyes National Seashore, which is detrimental to the public good.

In their letter dated March 4, 2022 requesting a delay in submitting water quality monitoring and climate strategy plans, the National Park Service claimed they have not prepared a water quality monitoring plan because they were busy contracting with laboratories, training staff, and procuring equipment. Not only do these activities not preclude preparation of a monitoring plan, they are usually done after a plan is approved so the number and types of analyses and equipment are known.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

It is negligent and irresponsible to cull a native species, whose population is on the decline in a National Park. Private, for-private cattle ranching operations in PRNS should not be prioritized over native Tule Elk.

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Stephanie Trasoff  
strasoff@hotmail.com [your location will go here]

**From:** [Michael Halloran](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:17 PM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The Voeller paper states 30 best management practices (BMPs) were implemented during from 2000-2013, however per water quality data reported and submitted to the Commission over the last year, it is evident BMPs do not work, as the watersheds in PRNS continue to be significantly polluted.

Beef and dairy cows at PRNS emit methane, a highly potent greenhouse gas, via burping and manure. There is no practical way to stop this process, except by removing the cows. Expensive “methane digesters” have limited effectiveness, and only mitigate a problem which shouldn’t even exist at a national park.

Tule elk exist only in California, and their numbers still are much lower than they were in the nineteenth century. There is no good reason that cattle in a national park should outnumber the tule elk by a factor of ten.

California is usually the leader in environmental safeguards, and Point Reyes National Seashore another opportunity on how to address climate crisis and the ongoing drought in this state. The public asks the CCC to vote against the NPS’ plan (CD-0006-02 ).

Sincerely,  
Michael Halloran  
mshalloran2605@gmail.com [your location will go here]

**From:** [Tracy Drake](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 2:21:12 PM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

The NPS' Voeller paper states early BMPs implemented have a large effect of improving water quality however subsequent BMPs implemented do not. The NPS implemented over 30 BMPs, and 170 management activities to improve water quality, therefore it is doubtful any additional BMPs will ensure our water in PRNS will improve.

US Methane emissions from livestock and natural gas are nearly equal.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8' fence. In addition, the NPS' plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Tracy Drake  
tld1218@hotmail.com [your location will go here]

**From:** [Jess Taylor](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 1:40:10 PM

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Dear California Coastal Commission ,

I am writing the California Coastal Commissioners requesting to withdraw your conditional approval from the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

The culling of Tule Elk is not consistent with the Coastal Act as it is not protecting natural resources in PRNS. Please to not support, nor find consistent any plan by the NPS that allows the killing of a protected, native species.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
Jess Taylor  
citta\_alta@yahoo.com [your location will go here]

**From:** [Nick Tucker](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 1:38:15 PM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

During the rainy season from 2021-2022, it was shared the Sonoma County Dairy Association were sampling surface waters in PRNS on behalf of the tenant beef and dairy ranchers. These water quality data should be made public, and submitted to the Commission, the San Francisco RWQCD, as the NPS has failed to provide any water quality data since 2013.

Animal agriculture is responsible for 18 percent of greenhouse gas emissions, more than the combined exhaust from all transportation, while transportation exhaust is responsible for 13% of all greenhouse gas emissions.

In just two years (2020-2021) over half of the Tule elk in the Elk Preserve died and the herd decreased from 445 individuals to just 221 surviving elk. The free-ranging herds are now at risk of culling, based on the NPS' plan.

Kindly act in the best interest of the public good.

Sincerely,  
Nick Tucker  
NicolasAnthony.Tucker@gmail.com [your location will go here]

**From:** [Rachel Taylor](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 1:37:22 PM

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Dear California Coastal Commission ,

Point Reyes National Seashore is a gem located along the Pacific Coast, and millions of people visit it each year to see the majestic Tule Elk, the elephant seals along the coastline, including the avian species which utilize PRNS as it is in the Pacific Flyway. For these reasons and more, I am writing to ask the Commission to help protect PRNS from cattle ranching, and revoke your conditional approval of CD-0006-20.

In 2017, a published report documented a leased parcel operating a cattle ranch in PRNS had the state's highest reported E.coli level. In 2021, data from a water quality study conducted in PRNS by an expert and downstream from leased parcels that operate polluting dairy and beef operations, confirmed bacteria levels exceeding water quality criteria in public waterways at Kehoe Creek and Abbotts Lagoon. These results were consistent with the NPS' results from 1999-2013, and once again, shows harmful bacteria levels in waterways in our National Park, even after best management practices were installed over a decade ago in these watersheds.

I caution the Commission of green-washing by the NPS, PRNS tenant ranchers, pro-ranching organizations and pro-ranching Board of Supervisors, and regional politicians, It is important for the Commission to read and reference independent, scientific, published articles on the lack of significant and long-term benefit regenerative ranching and carbon farming to address the climate crisis.

The public comes to PRNS to enjoy the natural resources, including the iconic Tule Elk. The NPS should not cull Tule Elk to support private cattle ranching in PRNS

These ranchers that lease parcels in PRNS, can move their commercial businesses outside of the park to the lands they own in Marin and Sonoma Counties, or lease land from other cattle ranchers. Removal of all ranching operations in PRNS will save and restore on our public land. I urge the Commission to withdraw your conditional approval as this plan is not consistent with the Coastal Act.

Sincerely,  
Rachel Taylor  
[racheldinno@hotmail.com](mailto:racheldinno@hotmail.com) [your location will go here]

**From:** [Scott Webb](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 1:05:15 PM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

Data available indicate that even after implementing significant numbers of best management practices (BMPs), water quality samples in Point Reyes were generally very poor and exceed bacteria limits for recreational contact more often than not. Testing by NPS in certain watersheds in Point Reyes ended in 2013, however recent testing done by concerned citizens in January 2021, shows that water quality remains extremely poor and that improvement trends implied by the NPS as of the end of their testing in 2013 are in fact not occurring.

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

Please do not allow the NPS to kill our free-ranging Tule elk. Our elk should be given the freedom to roam, especially in the only National Seashore on the West Coast.

Again, for the sake of water quality, the climate and biodiversity crisis, I urge the Commission to withdraw your conditional approval of the NPS' plan (CD-0006-02)

Sincerely,  
Scott Webb  
scottwebb02@gmail.com [your location will go here]



**From:** [Woody Elliott](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 12:45:20 PM

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Dear California Coastal Commission ,

On Earth Day 2021, the CCC narrowly voted in favor of extending commercial operations with conditions to submit a water quality strategy and climate action plan. While it was discouraging the commission would vote in favor of continuation and extension of commercial operations that are degrading a precious natural resource, we would like to thank the commission for setting conditions on concurrence and enforcing compliance standards that are long overdue.

The NPS and tenant cattle ranchers are aware of extremely high levels of pollution occurring in our streams, lagoons, waterways in PRNS, many that drain into Drakes Estero and the Pacific Ocean. It is unclear why the NPS and tenant ranchers have failed to do the right thing, by testing water quality over the last several years, while knowing of the high level of pollution that directly impacts public health and aquatic health.

Livestock is responsible for 65% of all human-related emissions of nitrous oxide – a greenhouse gas with 296 times the global warming potential of carbon dioxide, and which stays in the atmosphere for 150 years.

Please provide our native Tule Elk from the NPS' and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Your strong position on this federal consistency determination will send a powerful message that preserving a natural resource matters.

Sincerely,  
Woody Elliott  
[woodyelliott@gmail.com](mailto:woodyelliott@gmail.com) 94937-0368

**From:** [Amy Allen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 12:34:08 PM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

Proposed water quality improvements by the NPS at this stage should not be the continuation of current versions which have shown to fail to meet established water quality standards.

Over 5000 cattle are in the Seashore and use up to 78 million gallons of water per year, for drinking, and cleaning manure out of dairy barns. This is allowed to occur at a time of recurring drought in California, driven by the climate change which is exacerbated by the other impacts of those same cattle in PRNS. This is not right, to continue to lease parcels for cattle ranching activities, while the area is in a drought period, and the public is being asked to decrease their water usage. The right step for our National Park and the climate crisis, is to remove all cattle operations immediately.

Tule elk are endemic to California, and PRNS is the only National park with Tule elk. We just lost approximately half of the elk herd held captive behind the 8' fence over the last 2 years, due to lack of sufficient water and forage – the NPS were aware of this because concerned citizens made them aware. And now, the NPS' plan allows for the culling of the free-ranging elk. Please withdraw your conditional approval of the NPS' plan as the public wants to see Tule Elk in our National Park, not domestic cattle.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Amy Allen  
[amyntrip@sbcglobal.net](mailto:amyntrip@sbcglobal.net) 94901

**From:** [Walker Laughlin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 12:29:18 PM

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Dear California Coastal Commission ,

I am writing to respectfully request the CCC to help us protect our natural resources in PRNS, as it deserves to be saved and restored for the general public and future generations to come.

Voeller, et. al, “Rangeland 2021 Improved Microbial Water Quality Associated with Best Practices on Coastal Dairies and Livestock Operations” argue that agricultural best management practices (BMPs), such as fencing, manure management, development of off-stream water sources, and other means of separating cattle and their waste from surface waters, are effective at reducing fecal indicator bacteria (FIB). However, even Voeller admits that these practices don’t work in the rain noting: “Despite dramatic reductions, FIB concentrations still periodically exceed regulatory objectives and microbial pollutants remain that may introduce human, ecosystem, and other risks in our study watersheds...FIB levels increased across all stations during rainfall events.” He suggests smoothing the data to examine overall declines. Unfortunately, one can’t simply smooth the data when their child goes into the water and becomes ill. One, also, doubts species struggling to survive can ignore large spikes in pollutants during and after rains.

Removing cattle from the seashore and restoring native, perennial prairies and woody vegetation, which have been shown to sequester more carbon than the European grasses, would be an effective way to decrease carbon emissions.

Please provide our native Tule Elk from the NPS’ and cattle ranchers plan. No endemic species, that is protected by a federal conservation law, should be allowed to be culled.

Taking constructive action to eliminate or vastly reduce the methane pollution from too many cows, and allowing the native tule elk to live in peace in their natural environment are what the public wants from the Park Service, not excuses and more catering to the needs of the ranchers at the expense of the public. I urge the Commission to rescind the conditional approval of CD-0006-20, as it is time for the destructive cattle operations to end along our California coast in PRNS.

Sincerely,  
Walker Laughlin  
[walker@wellkind.org](mailto:walker@wellkind.org) 94930

**From:** [Richard Cerri](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 12:19:12 PM

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Dear California Coastal Commission ,

It is time for the right step to occur in our National Park on the coastline of California, Point Reyes National Seashore (PRNS). I respectfully request the Commission to withdraw your conditional approval of CD-0006-02.

The letter from the NPS to the Commission said, “Since the release of the ROD, the NPS has met with ranchers to begin identifying operational and infrastructure needs to further improve resource conditions.” Besides being a conflict of interest, it is precisely this approach that has led to the current violations of standard. CCC should add the condition that independent conservation, ecological and public environment organizations provide oversight over water quality rectification.

Regenerative ranching and carbon farming have minimal short term benefit. Methane released continuously from cattle exceeds any possible benefit. We and future generations need this National Park to be restored to native coastal prairie landscapes, including native trees – this is what will help with soil and vegetation health which in turn will benefit reducing CO2 from the atmosphere.

The NPS is being sued by Harvard Animal Clinic, due to the preventable and horrific slow death caused by starvation and lack of water of the Tule Elk herd confined behind the 8’ fence. In addition, the NPS’ plan allows the culling of the free-ranging elk, to keep the native species from competing with cattle for forage and water. Why is this allowed and supported in a National Park ?

With an objection to the federal consistency determination you will send a strong statement that the best climate action plan is to prioritize environment over private interests especially in a National Park.

Sincerely,  
Richard Cerri  
[cerri.richard@yahoo.com](mailto:cerri.richard@yahoo.com) 94945

**From:** [Daniel Dietrich](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 12:16:28 PM

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Dear California Coastal Commission ,

On March 4, 2022, Point Reyes National Seashore (PRNS) Superintendent Kenkel requested an extension on the agreed upon conditions, however the California Coastal Commission (CCC) denied the extension. I would like to thank the members of the CCC for holding the National Park Service accountable to address the agreed upon conditions from the April 2021 meeting.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

With respect to the Climate Action Strategy, when the Park Service does revert with a plan, the Commission can expect to hear an impressive group of buzz words such as "regenerative ranching," "carbon farming," etc. I urge the Commission to consider the source and do independent research regarding this unproven and self-interested set of speculations.

The Tule elk population were at approximately 500,000 in California until European settlers hunted them almost to extinction. Today there are as many cattle in PRNS as there are Tule Elk in California.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Daniel Dietrich  
dan\_dietrich2002@yahoo.com 94937

**From:** [Tyler Petersen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 12:03:08 PM

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Dear California Coastal Commission ,

Given the lack of conclusive scientific studies and data that clearly demonstrate the NPS can meet regulatory standards on a consistent basis by means of best practices in regards to: water quality, reducing the impact of climate change, and improving the well-being of the elk without the full removal of dairy and cattle ranches, I urge the California Coastal Commission (CCC) to withdraw their conditional approval of the National Park Service's (NPS) General Management Plan Amendment (GMPA) for Point Reyes National Seashore.

The NPS' Record of Decision notes 170 management activities were implemented to improve water quality in PRNS, however data on water quality available over the last year clearly notes that these management activities are not beneficial to improve water. It is time for tenant cattle ranching to end in PRNS.

A question: why should the NPS continue to financially support a polluting industry on our public land and in a coastal zone, that clearly is impacting our air quality with high levels of methane and green-house gases into our atmosphere ?

The NPS now has the ability to cull up some of the Drakes Beach herd from 151 to reduce to 140, based on their plan, and based on what they think is a 'management threshold.' Please note there is no science behind the NPS' number of 140. To date, it is uncertain the size of the other free-ranging herd (Limantour herd), as the NPS has not shared this information. Please help protect our Tule Elk.

The impacts of the beef and dairy ranches in PRNS can stop now, so that we can have clean water, clean air, and free-ranging elk. Please withdraw your conditional approval of the tenant ranchers and NPS' plan, as it is time to end these unnecessary impacts.

Sincerely,  
Tyler Petersen  
tylerpetersen411@gmail.com 94941

**From:** [Roxanne Moger](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 12:02:17 PM

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Dear California Coastal Commission ,

We face a key turning point in the fate of Point Reyes National Seashore. Will it be a National Park where nature and biodiversity thrive or degraded grazed lands where California endemic species are killed? Your decision on federal consistency can prevent an ominous fate of the only National seashore on the West coast.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

There has been much talk in the animal ag industry lately about “carbon farming” and “sustainable” or “regenerative ranching.” The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a “solution” to the real negative impacts caused by factory farms, and even so-called “family farms,” when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don’t be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

The NPS is engaged with FIGR on the horrific culling of our native Tule Elk. FIGR have not been involved in the protection of this native species so it is unclear why this is being allowed. Our native Tule Elk should not be killed for any reason, and the elk should be prioritized over tenant-owned domestic cattle in PRNS.

The public has made it abundantly clear in past hearings that it wishes ranching to cease in PRNS. The NPS does not have the credibility to enforce environmental protection of our precious seashore even if it comes up with plans to do so, and people are tired of being told that ranching was meant to continue indefinitely when the record and the public’s vision say otherwise. Our coast and its attendant wildlife cannot thrive while ranching persists, and it is time for it to end. The Commission is in the position to uphold the Coastal Act, put an end to the pollution and degradation caused by ranching operations, and open the door to true regeneration of native plant and animal life. Please don’t miss this opportunity. Do what’s right and rescind Consistency Determination CD-0006-20. I thank you.

**From:** [Kathy Cullen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:37:20 AM

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Dear California Coastal Commission ,

One of the most significant provisions of the federal CZMA gives state coastal management agencies federal consistency review authority over all federal activities. With the extent of documented inconsistencies and decades of inaction by the NPS to protect coastal watersheds and marine resources, the CCC staff has found that the GMPA is not “consistent to the maximum extent practicable” with the enforcement policies of the California Coastal Management program.

Since the Commission came within one vote of rejecting the NPS’s request for a Consistency Determination (CD) that their General Management Plan Amendment comports with the California Coastal Act, one would think the NPS would work diligently to perform the tasks it agreed to, to attain that CD. That is, until one looks at the NPS’s track record as the enforcing agency responsible for making sure that the private, for-profit ranches that are degrading our park are held accountable and made to remediate the damages they inflict. Therefore, it would be appropriate for the Commission to find that the GMPA is not consistent with the California Coastal Act at this time.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

It is unacceptable endemic Tule Elk in PRNS are second tier to domestic cattle raised by ranching tenants. Tule Elk should not be culled over cattle.

Impacts to water quality and air quality are unavoidable in PRNS while the cattle industry is allowed to continue – just follow the science. The culling of native Tule elk is avoidable, but the NPS’ and ranchers believe it is appropriate to do so, but the public does not. It is asked the Commission no longer support the NPS’ plan, and find the plan not consistent.

Sincerely,  
Kathy Cullen  
trimusic18@gmail.com 90503



**From:** [Michelle Waters](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:34:07 AM

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Dear California Coastal Commission ,

More than ever, the population is in need of outdoor places to go that provide a healthy and safe ecosystem with clean air and clean water, and abundant wildlife. I kindly request the Commission to reassess the conditional approval, as it is imperative to remove the commercial ranching operations from Point Reyes National Seashore, so that our waterways are no longer polluted with cattle manure, methane is no longer released into the air, and Tule elk can roam freely without the risk of being killed by the NPS.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

The CCC should not approve of a Climate Action Strategy from the NPS that can't prove demonstrable positive results. Claims of "regenerative ranching" or "carbon farming" cannot be accepted at face value. Such claims must be backed up by independent studies not funded by private or commercial interests. There is a lot of pseudo-science being tossed around, but when one looks under the surface, most of it is worthless. Commissioners owe it to themselves and the public to vet any such claims before allowing a climate plan to be based on them.

The agriculture lobbyists and unfortunately some of our local, state and congressional politicians support the culling and confining of our Tule Elk in PRNS. This is not acceptable. Please help protect the Tule elk from the poor decisions being made by the NPS, and the politicians who are financially benefitting from the ranching industry.

Thank you for your time, and please help us protect our National Seashore, the only National Seashore on the West Coast.

Sincerely,  
Michelle Waters  
[flyingcat95033@yahoo.com](mailto:flyingcat95033@yahoo.com) 95033

**From:** [Wendy Dreskin](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:20:21 AM

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Dear California Coastal Commission ,

I want to recognize the critical step that the California Coastal Commission (CCC) has taken to make the National Park Service (NPS) bring forth their Water Quality and Climate Change strategies, along with the well-being of the free-ranging elk herd to supplement the General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the Golden Gate National Recreation Area before the CCC signs off.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO<sub>2</sub>) per year, or 51% of all worldwide greenhouse gas emissions.

Please protect the native tule elk from being culled in our National Seashore.

California is in the midst of a significant drought. Why do we continue to allow a private industry pollute our limited surface waters, and use significant amounts of water from our natural springs causing them to run dry, in a National Park? Time to end this extractive industry in our public land. Please change your conditional approval, and vote No on the NPS' plan.

Sincerely,  
Wendy Dreskin  
[bdreskin@comcast.net](mailto:bdreskin@comcast.net) 94960

**From:** [William Teufel MD](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 11:12:14 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

Surface water at Point Reyes has been contaminated by E. coli, which originates from commercial beef and dairy ranching. Concerned citizens, with no financial interest at stake, have documented this over many years. Despite promises to implement “best practices,” water quality at PRNS remains poor.

The promise of ranching that offsets methane by storing carbon in the soil would be a blessing. However, there is not enough evidence that regenerative ranching works. First there is a problem with defining it. Regenerative ranching could be about processes (how you farm) or outcomes (what you achieve). Second there is a problem with measuring the impact. There is widespread scientific debate about how much carbon agricultural lands can actually sequester in the soil. Experts suggest “the potential carbon benefit can vary from region to region, farm to farm, even from parcel to parcel within a single farm. It can change based on soil composition. It can change based on the level of nitrogen available.” And it is suggested that some agricultural lands max out their carbon sequestration potential over time. The CCC should have more evidence of sound working practices before signing off on a strategy.

A Tule elk cow weighs on average 341 pounds, while a Holstein dairy cow weighs 1500 pounds. An elk cow consumes 6.8 pounds of dry weight forage a day while a Holstein dairy cow consumes 6.7 times more food than the average elk cow – a whopping 45.6 pounds of dry weight forage a day.

I urge the committee to be sensitive to overly-optimistic predictions without sufficient enforcement budget and governance, and with insufficient penalties for the seemingly inevitable violations of whatever the new terms of ranch operations may be.

Sincerely,  
William Teufel MD  
wlteufel@comcast.net 94963

**From:** [Sara Jara](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:57:15 AM

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Dear California Coastal Commission ,

I am writing the Commission to share my concern that no amount of water quality strategies and climate action plans will stop the significant impact of cattle ranching in PRNS. For this reason, I kindly request the Commission to vote against Plan B, by withdrawing your conditional approval.

This not the first time the National Park Service at Point Reyes National seashore has snubbed the California Coastal Commission. According to the National Park Service General Management Plan Amendment EIS, a loafing barn was constructed at the McClure dairy between 2004 to 2006. The National Park Service stated “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...” (National Park Service report by Ketcham, November, 2001). However, water quality standard exceedances continued after the barn was constructed and no reports to the Coastal Commission are in evidence in the extensive references cited in the EIS.

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like “Regenerative” and “carbon farming” techniques.

People who enjoy the outdoors like to marvel at the wonderful creatures of nature, such as the tule elk. The elk can thrive in a coastal prairie that is free from barbed wire and restrictive fences

It is time to prioritize the environmental health and the love of our wildlife in PRNS. Please rescind your conditional approval, and let’s restore our National Seashore

Sincerely,  
Sara Jara  
[Prosarajara@gmail.com](mailto:Prosarajara@gmail.com) 94901

**From:** [Pamela Ross](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:54:17 AM

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Dear California Coastal Commission ,

The overall health of our National Park and the Pacific coastline is far more important than a handful of cattle ranching tenants making money off of public lands while impacting our landscape, our waterways, our native wildlife. I urge the Commission to revoke your conditional approval of the National Park Service's CD-0006-02.

The Park Service's own Environmental Impact Statement (EIS) notes BMPs as fencing cattle out of waterways can only go so far, and there's not much else that can be gained beyond what's been achieved to date. In addition, BMPs have been employed since the last tests performed by the NPS, and if NPS is to be believed, pollutant levels would show a reduction by now. However, testing by concerned citizens show consistent excess unsafe bacterial and coliform levels.

There has been much talk in the animal ag industry lately about "carbon farming" and "sustainable" or "regenerative ranching." The Commission should be abundantly aware that this is almost exclusively greenwashing. Such efforts have minimal and short-lived benefits, as soil carbon absorption quickly reaches a saturation point, it requires way more land and labor to rotate grazing than is either available or economically feasible, and it is being promoted as a "solution" to the real negative impacts caused by factory farms, and even so-called "family farms," when in reality it is a distraction from actually addressing the problems. In fact, these techniques are meant to address excess manure, but the methane produced by cattle exceeds any small benefit gained. Sadly, a number of pseudo-environmental groups such as the Marin Conservation League, Marin Resource Conservation District, the Environmental Forum of Marin and others have given cover to these efforts with their not-disinterested support, but don't be fooled – the science says such approaches barely work, and definitely are not an answer to the harms caused by concentrated animal operations. Any partnership between NPS and these or other promoters of false science should not be acceptable to the CCC.

In 1993, the Report of the Scientific Advisory Panel on Control of Tule Elk on Point Reyes National Seashore concluded, "The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve ... removal of the fence across Tomales Point. [The National Park Service] and [California Department of Fish and Game] should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention." This report is in the NPS Elk Management Plan, therefore what does the NPS continue to prioritize destructive cattle ranching over our native Tule Elk ?

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

**From:** [Kathleen Ames](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:40:17 AM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The only certain and effective way to address water quality pollution, such as the dangerous levels of E-Coli, in watersheds containing dairies and ranches is to remove the domestic animals. Impacts of cattle defecating in streams cannot be mitigated - it should never have been allowed to occur.

The only sound and definitive Climate Action strategy pertinent to the Point Reyes National Seashore's GMPA is to rid the area of dairy and cattle ranches and their immediate and related residue - not a proposal for an 'off-set'.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

The National Park Service is obviously enduring significant political pressure to continue ranching in the park, regardless of the consequences to the environment and the public. Representative Huffman, Senator Feinstein, and others, have explicitly directed NPS to continue ranching, before the EIS was published. NPS is not free to act on science and data, and is in fact under great pressure to misrepresent the situation to justify a predetermined outcome of the entire process.

Sincerely,  
Kathleen Ames  
kateames@hotmail.com 94960

**From:** [Kathleen Ames](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:39:31 AM

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Dear California Coastal Commission ,

In April 2021, the Commission conditionally concurred with the consistency determination (CD-0006-20) submitted by the National Park Service's (NPS) General Management Plan Amendment (GMPA) for PRNS/GGNRA giving NPS a full year to present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging elk herd. NPS made this information public on March 25, 2022 thus allowing little time for review and rebuttal. As a concerned citizen I urge the CCC to allow more time for thorough review and vetting of these strategies before approving the GMPA

The industrial ranching operations at PRNS, which include massive (30,000 sq. ft.) modern loafing barns, don't resemble the small traditional historic ranches of six decades ago, from before the formation of the PRNS. Tons of feed are brought in, and excess manure is stored in poop lagoons and later sprayed onto fields. This crude practice doesn't enable natural composting, and results in water pollution.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

Tule elk help make Point Reyes National Seashore a desirable place to visit. NPS policy should protect them better.

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 over 50 species registered as threatened, rare, or endangered at the state or federal level. It is imperative we keep our Park clean and unimpaired for bird species, and protect what is far more important than an extractive cattle industry on public lands. Please vote against Plan B, as we must do everything we can to protect our environment, especially on public lands.

Sincerely,  
Kathleen Ames  
[kateames@hotmail.com](mailto:kateames@hotmail.com) 94960

**From:** [Clay Bell](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:34:15 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Reinstatement of water testing shouldn't take more than a year to set up, and would have been restarted by any responsible agency immediately after the CCC's prior hearing on this issue. This arrogant lack of responsiveness by the NPS is reason enough for the Commission to rescind CD-0006-20. If the Park Service can't even say how they're going to mitigate the damages caused by their GMPA, how can they be expected to actually implement any planned action?

Dairy farms and cattle ranching don't belong in a national park. They contribute to climate change. Don't be fooled by false "greenwashing" claims, about "regenerative grazing" or "carbon farming." Those concepts are promoted by big money interests, but their overly optimistic claims aren't published in referenced journals.

Because of livestock at PRNS, the free roaming tule elk have been infected with Johne's disease, and therefore can't be relocated. Commercial operations that harm wildlife do not belong in a public park.

The ecological richness and value of Point Reyes needs to be reiterated. It contains a mosaic of habitats in all areas except on 28,000 acres where ranching operations is allowed. It supports diverse wildlife including our endemic Tule elk, however ranching operations impact our wildlife through culling of the elk, hazing and silage mowing. We must restore the areas destroyed by ranching, by ending private cattle ranching in PRNS. Please withdraw your conditional approval and vote against the Plan, as the Plan has no ability to protect our water, air and wildlife.

Sincerely,  
Clay Bell  
[clay@spearlab.com](mailto:clay@spearlab.com) 94116



**From:** [beverly petersen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:34:10 AM

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Dear California Coastal Commission ,

The impact of cattle operations on our water, air and Tule elk should not be allowed on public land, therefore please reassess your conditional approval on CD-0006-20.

The NPS states their plan does not impair any resource, and claims water quality in the Seashore will improve in line with two cited studies (Voeller 2021; Lewis 2019). However, the NPS has not shared water quality data since 2013, therefore the NPS cannot state water quality will improve. Water quality data from 2021 provided by concerns citizens state the opposite – water quality is impaired to a level that it is a high risk to humans, as well as aquatic life.

Instead of offering a strategy to reduce air emissions, the National Park Service points to the closure of one of the dairies at the park. However, the NPS offers no guarantee that the lease will not be taken over by another rancher who will bring in more cattle in the future. Indeed, their Succession Policy dictates that surrendered leases will be preferentially offered to other ranchers, their families, even their employees. If the National Park Service wants to demonstrate a sincere desire for lasting improvement in the quality of water and air at Point Reyes National Seashore they can start by rewriting their succession policy to permanently retire leases when ranchers do not wish to renew them, thereby allowing the land to return to an ecologically sustainable state that would benefit wildlife and improve the enjoyment of visitors.

The tule elk at PRNS are restricted, both by the barbed wire fences and by the 8-foot tall fence at Tomales Point. The fences should be removed, for the sake of these native animals, and no wildlife in PRNS should be culled for private financial benefit of domestic cattle.

The mere fact that the NPS has asked for this delay demonstrates a failure to meet the CCC's requirements for a CD. This should be taken as proof that the NPS does not intend to fulfill its responsibilities. Therefore, I ask that the Commission rescind its conditional concurrence and declare the NPS's General Management Plan Amendment inconsistent with the California Coastal Act. Thank you for your consideration of these matters, and I respectfully request the Commission revoke their conditional approval.

Sincerely,  
beverly petersen  
bev0742@yahoo.com 94086

**From:** [William Parrinello](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:31:14 AM

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Dear California Coastal Commission ,

I would like to thank the California Coastal Commission (CCC) for denying an extension to the National Park Service (NPS), and requiring the NPS to return to the April 2022 meeting and present a Water Quality Strategy, Climate Action Strategy, and an update on the well-being of the free-ranging herd, per the agreement reached after the April 2021 meeting. As an individual concerned with the continual and significant impact occurring in a National Park and caused by private ranching operations, I want to thank the Commission for holding the NPS accountable.

The McClure Dairy built a 36,000 square foot loafing barn on the rolling hills near the Pacific Coast in 2004, to help the dairy financially and to reduce the significant impact on water quality from the cattle operations. Please note the high levels of water pollution in this watershed which drains into Abbotts Lagoon, a waterway enjoyed by aquatic life, including river otters, and the public. This is a prime example that a loafing barn, a best management practice (BMP) has no benefit in protecting our water from cattle manure in PRNS.

Approximately 20% of the greenhouse gas (GHG) emissions from the Marin agriculture operations comes from the tenant cattle ranching operations in PRNS. That is a significant amount of GHGs coming out of public lands, caused by a polluting industry, and is not acceptable.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

Kindly act in the best interest of the public good.

Sincerely,  
William Parrinello  
willmvfg@gmail.com 94965

**From:** [Audrey Fusco](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:30:31 AM

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Dear California Coastal Commission ,

Thank you, Commissioners, for refusing to let the National Park Service delay reporting back to you with their plans to address water pollution, air pollution and tule elk management as agreed to by the NPS. Those of us who have witnessed the NPS's mismanagement of Pt. Reyes National Seashore over the years will be surprised if they actually come back with plans for CCC review, and even more so should they be meaningful. Should any such plans surface, it will bear close ongoing scrutiny to see if plans are ever implemented.

According to the NPS' own EIS, "Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, Manure and Nutrient Management, and water consumption related to ranching activities." If ranching were removed from PRNS, the EIS states "...impacts on water quality would be noticeable, long-term, and beneficial because ranching activities would be phased out across the entire planning area." Therefore why does the NPS have the option to continue to allow destructive ranching operations in PRNS when it continues to impact our water?

Our best defense for the climate crisis is to preserve wilderness, especially in a National park, not try to solve a problem created by grazed lands with experimental unproven techniques like "Regenerative" and "carbon farming" techniques.

Domestic cattle raised for private, financial benefit on public lands should not be prioritized over endemic Tule Elk. This is another reason why I urge the Commission to revoke your conditional approval.

The ongoing impact to our water, air, land, vegetation and native wildlife in our National Park is inappropriate. It is time to end the polluting and extractive ranching industry on our public land. The NPS' plan is not consistent with the Clean Water Act, Clean Air Act, nor does it protect our wildlife. Please vote against the NPS' plan.

Sincerely,  
Audrey Fusco  
[audrey.fusco@gmail.com](mailto:audrey.fusco@gmail.com) 94963

**From:** [Kelli Petersen](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:29:30 AM

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Dear California Coastal Commission ,

I am writing to request the CCC to help us protect coastal and marine resources in PRNS.

The NPS documented that over 170 management activities have been implemented to improve water quality, however per data provided by concerned citizens, clearly notes that these 170 management activities have had no to minimal benefit, as our waterways in the coastal areas continue to be significant polluted, and at levels that are unsafe for public use, and also unsafe for fresh water aquatic life, including marine life.

Rearing cattle produces more greenhouse gases than driving cars, UN report warns.

It is tragic that a National Park that should consider killing Tule Elk, a species endemic to California and introduced to Point Reyes to be protected. Please do not allow park service to kill Tule Elk to protect private interests.

In the midst of a climate crisis and biodiversity crisis, we can utilize our public land in PRNS to help slow or stop each. There are private land owners trying to create native habitats in their yards to help with climate change and the biodiversity crisis. We should do the same on our public land in PRNS. Please say No to the NPS' plan

Sincerely,  
Kelli Petersen  
[kellipetersen@sbcglobal.net](mailto:kellipetersen@sbcglobal.net) 94941

**From:** [Watson Gooch](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 10:26:27 AM

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Dear California Coastal Commission ,

The NPS' plan CD-0006-20 should be unacceptable to all. The plan impacts the quality of water, air and soil, impacts our native wildlife and native vegetation. I urge the Commission to withdraw your conditional approval of the NPS' plan, for the sake of our environmental and for future generations.

California's highest E.Coli level was recorded on a Point Reyes ranch. Park service's 2013 water quality study determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts areas with high concentrations of fecal coliform. As a regulatory body with jurisdiction and mission to protect the California Coast these findings should be unacceptable. When will it be enough for your decisive action?

Cattle ranching generates high levels of methane – independent and scientific data document this, and methane release is a leading cause of the climate crisis. The public should subsidize nor support any activities of the NPS nor the tenant ranchers in PRNS to help reduce their polluting industry.

I am offended by the idea that native tule elk must be “culled” because they are supposedly interfering with commercial beef and dairy operations in a national park. Native Tule Elk should be given priority over the tenant ranching operations.

The public has spoken, and the data continues to document the egregious and unethical impacts to our natural resources on our public land in PRNS. Please withdraw your conditional approval of the Consistency Determination (CD-0006-20)

Sincerely,  
Watson Gooch  
wpgooch111@gmail.com 93402

**From:** [jonathan spear](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:10:09 AM

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Dear California Coastal Commission ,

We must protect and preserve our coastal zones in Point Reyes National Seashore, from the destructive cattle operations on our public lands. Our water is being polluted, our air is being polluted, and our endemic wildlife are being culled, under the NPS' Plan. Please help us protect our National Seashore by revoking your conditional approval.

Commercial ranching operations take up about one third of the total land area at PRNS, and they use almost all available fresh water on the peninsula. For example, the big McClure (I Ranch) and Kehoe (J Ranch) operations are strategically situated in valleys where they take water from a natural spring and from Abbotts Lagoon. Removing this water harms the ecosystem.

Coastal prairies sequester carbon better than annual cheatgrass in grazed land which is also a fire hazard. "Carbon farms" are experimental and not proven to scale. Methane digesters are not cost-effective. We do not have too much time to respond to the climate crisis. We should not deflect from reality to suit private interests using catchphrases to confound the reality of claims.

The health of the free range elk herds must be recognized as an immediate issue. Proposed climate action strategies may or may not come to fruition to aid them and cannot be used as a proxy for addressing current needs.

In light of non-adherence to proper testing regime and evaluation it would be prudent for the CCC to withdraw your conditional approval of the Consistency Determination (CD-0006-20) to properly comply with your fiduciary responsibilities and to be evaluated, again, when the interests of all effected parties are properly addressed.

Sincerely,  
jonathan spear  
[jdspear@alumni.princeton.edu](mailto:jdspear@alumni.princeton.edu) 94930

**From:** [lonna richmond](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Monday, March 28, 2022 9:00:15 AM

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Dear California Coastal Commission ,

I am writing to ask the Commission to rescind your conditional approval on CD-0006-02, and vote against this NPS plan, as we must address the ongoing issue of destructive cattle ranching in PRNS that continues to degrade water and air quality, and impacts the lives of the native Tule Elk.

The NPS had 12 months to create a surface water quality plan, and also had plenty of opportunities to collect water samples during the several rain events that occurred between in the PRNS/GGNRA area between October 2021 and early 2022. These data could have been shared with the Commission and the concerned public, however the NPS requested an extension, therefore it is assumed the NPS did not follow through with the agreed upon condition.

Methane is 25-100 times more destructive than CO2 on a 20-year time frame.

Native Tule elk were reintroduced into PRNS in 1978, to help restore the herd that was once over 500,000 in population, and now the herd is down to 5000. Please do not support the culling of this endemic species, and withdraw your conditional approval of CD-0006-20, and vote against the NP and rancher's plan.

Thank you for your time in reading this letter. Again, I request the Commission to rescind your conditional approval, and help save our native wildlife, and help save PRNS.

Sincerely,  
lonna richmond  
[lonnajean@gmail.com](mailto:lonnajean@gmail.com) 94965

**From:** [Chris Jones](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-  
**Date:** Friday, April 1, 2022 3:25:19 PM

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Dear California Coastal Commission ,

I am calling on the Commission to help protect the unique landscape and wildlife in Point Reyes National Park. The air, the water, and the wildlife all deserve protection, and this can occur with the support of the California Coastal Commission.

Decades of inaction and lack of enforcement by NPS has eroded public trust and the latest request by NPS to request an extension to present the water quality strategy is another example of the park service lack of interest in addressing the serious situation. When will it be enough for the CCC to take a stronger position to preserve the California coast?

Livestock and their byproducts account for at least 32,000 million tons of carbon dioxide (CO2) per year, or 51% of all worldwide greenhouse gas emissions.

The NPS' plan allows for the culling of the free-ranging elk, to benefit ranchers who rent parcels on our public land. This is not appropriate. Please reconsider your conditional approval of the NPS' plan.

Your decision to revoke the concurrence will send an unequivocal and strong message that it is important to protect the diminishing natural and biodiverse ecosystems against private interests.

Sincerely,  
Chris Jones  
[cagjones@yahoo.com](mailto:cagjones@yahoo.com)



**From:** [litemikie@everyactioncustom.com](mailto:litemikie@everyactioncustom.com) on behalf of [Mikie carroll](#)  
**To:** [Coastal Point Reyes Management Plan](#)  
**Subject:** Reject the Conditional Compliance to Point Reyes GLMPA  
**Date:** Monday, March 28, 2022 12:21:27 PM

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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.

Sincerely,  
Mr. Mikie carroll  
225 W Cypress Ave Kingsland, GA 31548-4269  
[litemikie@yahoo.com](mailto:litemikie@yahoo.com)