

CALIFORNIA COASTAL COMMISSION

455 MARKET STREET, SUITE 228
SAN FRANCISCO, CA 94105-2219
FAX (415) 904-5400
TDD (415) 597-5885



Th10b

CD-0006-20 (National Park Service)

***Updated Correspondence from April 7, 2022, Commission Meeting**

***Subsequent to the April 7, 2022 meeting, Commission staff were notified that some pieces of written correspondence that were timely submitted during the comment period had been unintentionally omitted from the Correspondence Packet. This updated Correspondence Packet has therefore been prepared to include all pieces of written correspondence that were timely submitted for the Commission's April 7, 2022 meeting on this item and received between:**

8:00am, March 18, 2022 and 5:00pm, April 1, 2022

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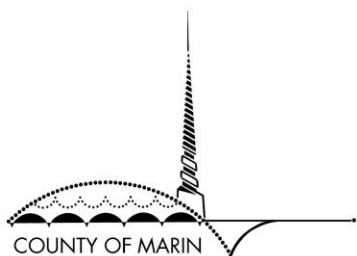
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CD-0006-20
(National Park Service)

UPDATED
August 24, 2022

CORRESPONDENCE
Letters from groups and
organizations



UNIVERSITY OF CALIFORNIA • AGRICULTURE & NATURAL RESOURCES

COOPERATIVE EXTENSION • MARIN COUNTY

The University of California working in cooperation with Marin County and the USDA



David Lewis
DIRECTOR

1682 Novato Boulevard
Suite 150B
Novato, CA 94947
415 473 4204 T
415 473 4209 F
CRS Dial 711
www.cemarin.ucdavis.edu

Chair Donne Brownsey
California Coastal Commissioners
John Ainsworth, Executive Director
Kate Huckelbridge, Senior Deputy Director
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Subject: Agenda item TH18a – Condition Compliance for Consistency
Determination No. CD-006-20. National Park Service, 2020 General
Management Plan Amendment for Point Reyes National Seashore and the
North District of Golden Gate National Recreation Area.

Dear Ms. Brownsey:

Introduction

Thank you for the opportunity to provide comment on this agenda item. On April 16, 2021, I provided written comment for the Commission's consideration in its original consistency determination of the National Park Service, 2020 General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and the North District of Golden Gate National Recreation Area (attached).

Based upon my professional expertise and experience as the UC Cooperative Extension Watershed Management Advisor, the GMPA and accompanying Environmental Impact Statement (EIS) were rigorously prepared to achieve the multiple integrated resources goals for PRNS and the planning area. In particular, and relevant to the Water Quality Monitoring Strategy that is before you on April 7, 2022, the GMPA EIS integrates a comprehensive catalogue of USDA Natural Resources Conservation District practices (GMPA Appendix F) into the development of Ranch Operating Agreements (ROAs). These practices have been researched and confirmed to protect and conserve soil and water resources. By incorporating them into the GMPA and planning for their specific implementation through ROAs and a zone framework for land use, the NPS has identified the tools that staff and agricultural producers on the PRNS need to successfully contribute to obtaining the GMAP resource goals. These tools and planning approach are in keeping with the tenets of adaptive management used successfully by state and federal resource managers to achieve natural resource objectives and goals on multi-use landscapes.

Submitted Strategies

Nearly on-year later, the NPS is presenting its First Year Version of the Water Quality Strategy and Climate Action Strategy for the GMPA. These strategies are consistent with Conditions I, II, and IV of the Commission's conditional concurrence with Consistency Determination No. CD-0006-20 and should be approved. In the

water quality monitoring strategy, NPS is building upon an existing NPS water quality monitoring framework that includes reviewed and approved sampling and analysis protocols and transparent data compilation and reporting. It also is integrating into that framework six monitoring programs to account for and be responsive to multiple mandates and monitoring requirements within the planning area. NPS has reinitiated its Coastal Watershed Monitoring (Program 1), from which came the long-term trend analysis presented in GMPA Appendix L, documenting improvements in water quality related to conservation practice implementation. This requires well planned routine monitoring at the same locations over time and with a frequency to account for annual and seasonal variability in precipitation and stream flow. Program 1 and Tomales Bay watershed Monitoring (Program 5), with their long-term monitoring design, achieve this. Program 1, coupled with Short-term Assessment Monitoring (Program 2) is an approved and recommended approach to conduct rapid one-time assessments to information management and conservation practices implementation in a watershed and simultaneously monitoring long-term water quality trends.

Additionally, NPS is conducting or supporting other regulatory monitoring that include Regulatory Dairy Monitoring (Program 3), Recreational Beach Sampling (Program 4), and Olema Creek watershed – Regulatory Bacterial Monitoring (Program 6). In each case, NPS is leading or collaborating on sample collection and analysis with local and state agencies to confirm conditions and safeguard water quality relative to California water quality regulations and public health policies.

The Climate Manage Strategy focused primarily on the changes to the GMPA preferred alternative. In the strategy, NPS notes that GMPA EIS “analysis concluded that emissions from the preferred alternative were below the de minimis levels. The GMPA and ROD further found that the primary driver of air quality in the GMPA planning area was and would continue to be regional sources.” This is consistent with the recently developed and approved Marin Climate Action Plan (CAP) 2030, a precedent setting, local jurisdiction climate management plan that includes a comprehensive agriculture chapter with the opportunities and solutions for climate management that working landscapes represent. Coordinating and integrating the NPS Climate Management Strategy with the Marin CAP 2030 will provided increased beneficial impacts through implementation of research proven practices to sequester carbon.

Water Quality Background Levels

The in-depth discussion and focus on water quality during the April 16, 2021, Commission’s all-day hearing and this agenda item on April 7, 2022 present wonderful opportunities to continue public engagement and learning about watershed conditions and background levels for constituents like indicator bacteria. This discussion and learning occurred as part of the San Francisco Bay Regional Water Quality Control Board’s (SFRWQCB) development of the Tomales Bay Pathogen Total Maximum Daily Load (TMDL) in 2005. As part of the TMDL development, I provided analysis and comment to the SFRWQCB on background environmental levels of fecal coliform (attached). A portion of those comments regarding control watersheds, akin to the NPS reference monitoring sites, has been edited and inserted here to contribute to the discussion and learning.

In 1995 and 1996 the Tomales Bay Shellfish Technical Advisory Committee (TBSTAC) conducted an *Investigation of Pollution Sources Impacting Shellfish Growing Areas in Tomales Bay*. I have included a portion of the data from the TBSTAC report that represents the fecal coliform concentrations from three identified “control watersheds” (Table 1). Two of these are on the east shore of the bay: 1) Milepost 36.17 entering Marconni cove; and 2) Milepost 38.54 entering cove on which Hog Island Oyster Company sits. The third site is White Gulch on the west shore of the Bay. In each case, the concentrations of fecal coliform are consistently greater than targets and allocations of 43 MPN/100ml. This is the allocation assigned to meet the in-bay water quality standards for shellfish harvesting beneficial use. Note that in addition to this TMDL requirement, the concentrations also exceed the standards for contact recreation beneficial uses. If water quality conditions in these control watersheds are above the proposed allocations, then it seems unrealistic to expect that values in watersheds with identified source categories could meet them. It is useful to note that these results provide an indication of what background concentrations for fecal coliform could be within Bay tributaries.

Table 1: Fecal concentration (MPN/100ml) results from the Tomales Bay Shellfish Technical Advisory Final Report of its 1995-1996 study.

Date	Milepost 36.17	Milepost 38.54	White Gulch
9/12/95	511	78	170
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2/11/96	120	18	33
3/11/96	490	78	33
3/12/96	3,704	1,300	230
3/13/96	330	78	34
3/18/96	2,200	20	13
4/1/96	30,298	8,400	490
4/2/96	790	790	130
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4/8/96	1,100	1,300	43
7/9/96	45	3,300	230

From 1999 to 2004, the University of California Cooperative Extension conducted water quality research on 11 dairy and ranch facilities within the Bay watershed. As part of this study, water from the Milepost 36.17 site, studied in the TBSTAC investigation, was sampled and analyzed. Because the study objective was to determine links between upland sources of fecal coliform and Bay conditions, the majority of sampling was conducted during storm events and stormflow conditions. Additionally, a number of samples between storms during baseflow conditions were collected. Results from this five-year study indicate that baseflow fecal coliform concentrations are lower than stormflow values. However, baseflow and stormflow concentrations are consistently higher than the TMDL one-sample targets and allocations of 43 MPN/100ml (Figure 1). Additionally, these results document the

direct relationship between stream discharge and fecal coliform concentration (Figure 2).

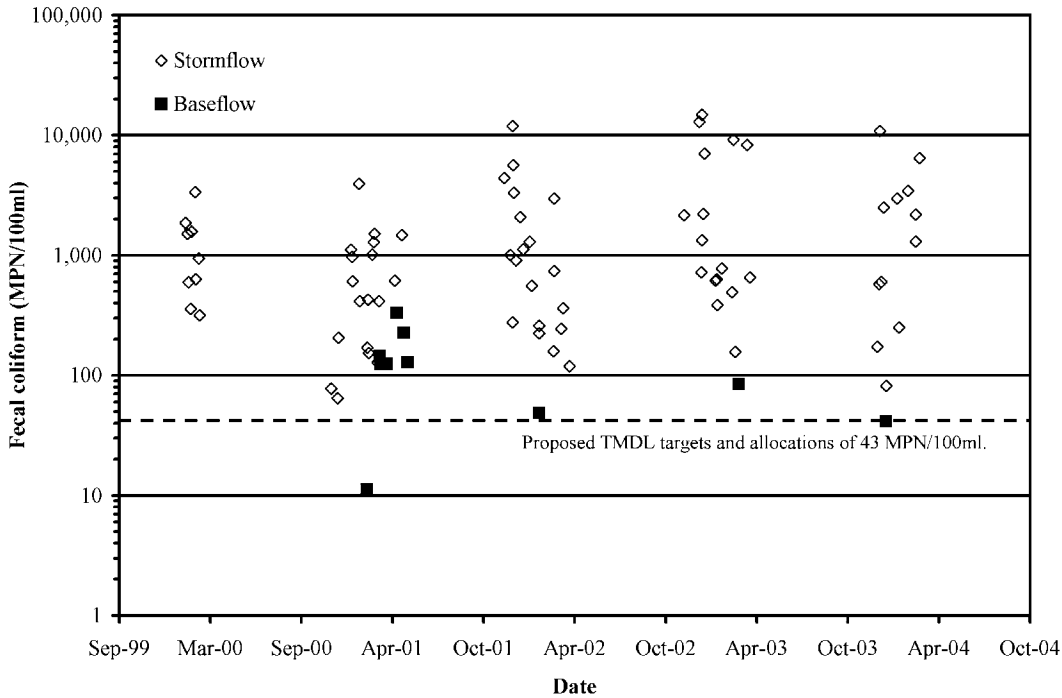


Figure 1: Fecal coliform concentrations from samples collected at Milepost 36.17 on the east shore of the Tomales Bay watershed from 1999 to 2004.

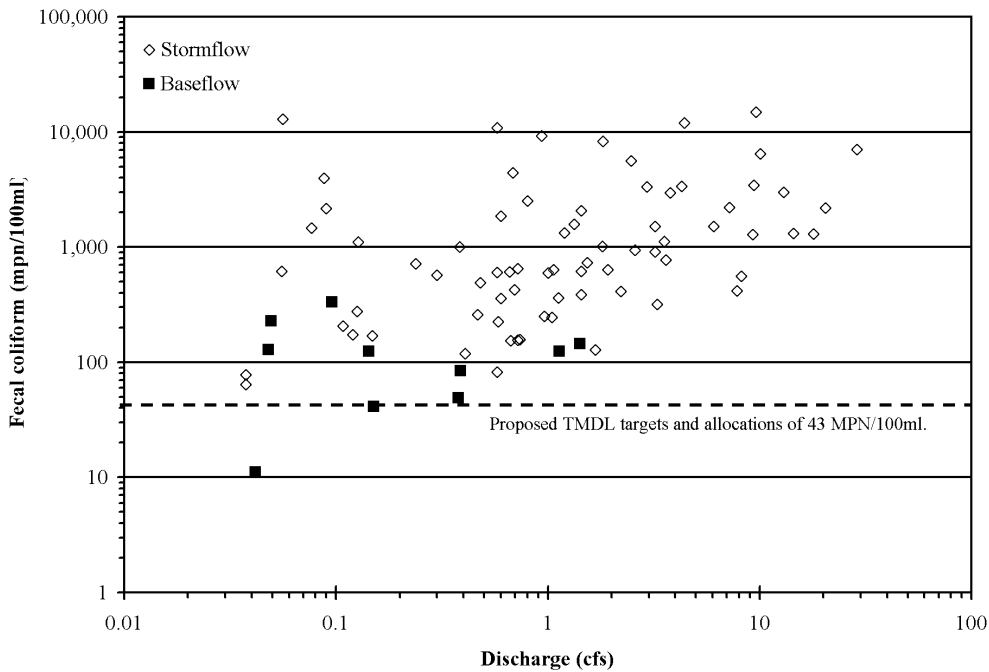


Figure 2: Relationship between fecal coliform concentrations and stream discharge for samples collected at Milepost 36.17 on the east shore of the Tomales Bay watershed from 1999 to 2004.

Using the watershed above Milepost 36.17 and others like as controls or comparisons, to watersheds with more intense land use, provides us with an indication of background fecal coliform levels that can be used to set achievable water quality targets and allocations.

Summary

I am grateful for this opportunity to provide comments on the NPS First Year Version of the Water Quality Strategy and Climate Action Strategy for the GMPA EIS. There will continue to be community discussions and learning around water quality and other resources and their interactions with land uses. Background environmental levels and conditions are always useful contexts in these discussions.

The submitted strategies meet the Coastal Commissions Conditions I, II, and IV of the Commission's conditional concurrence with Consistency Determination No. CD-0006-20. They also contribute to the research proven adaptive management plan that NPS has developed and approved in the GMPA EIS to achieve the multiple and integrated resource management goals mandated for PRNS and the planning area. Thank you for your consideration of these comments and approving the submitted strategies.

Thank you,

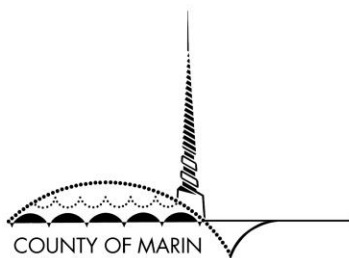
A handwritten signature in black ink that reads "David J. Lewis". The signature is written in a cursive, flowing style.

David J. Lewis
Watershed Management Advisor

Attachments:

Comment letter dated April 16, 2021 to California Coastal Commission

Comment letter dated April 18, 2005 to San Francisco Bay Regional Water Quality Control Board.



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David Lewis
DIRECTOR

1682 Novato Boulevard
Suite 150B
Novato, CA 94947
415 473 4204 T
415 473 4209 F
CRS Dial 711
www.cemarin.ucdavis.edu

April 16, 2021

Chair Steve Padilla
c/o Mr. John Weber
Federal Consistency Program
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Subject: Coastal Commission Staff Report recommending conditional concurrence for the Point Reyes National Seashore and North District Golden Gate National Recreation Area General Management Plan Amendment and Environmental Impact Statement

Dear Mr. Padilla:

This letter is to share my support of the National Park Service's (NPS) request for a Coastal Consistency Determination (CCD) for the Point Reyes National Seashore (PRNS) and Northern District of the Golden Gate National Recreation Area (GGNRA) General Management Plan Amendment Environmental Impact Statement (GMPA EIS). UC Cooperative Extension Marin has participated actively throughout the National Environmental Policy Act (NEPA) process conducted by NPS staff to develop the GMPA EIS, providing scoping comments (attached) and comments on the Draft EIS (attached) offering our organization as a resource for NPS staff and affected agricultural producers ranching on the PRNS and GGNRA.

This letter also communicates technical and evidenced-based information from my professional experience and expertise in the region and the field of watershed management. There exists a broad body of literature, long-term local implementation of conservation practices with corresponding documented beneficial impacts, and a regulatory framework that can inform California Coastal Commission (CCC) staff's recommendation for conditional concurrence and Commissioner consideration of this recommendation for the proposed action.

Watershed Management

Dr. Kenneth Brooks and co-authors share a working definition for watershed management explaining that it "is the process of organizing and guiding land, water, and other natural resource use on a watershed to provide desired goods and services to people without affecting adversely soil and water resources."¹ This definition is complemented by the concept and definition of ecosystem services from the United Nations Millennium Ecosystem Assessment² explaining that:

¹ Brooks et al. 2012 Hydrology and the Management of Watersheds, Fourth Edition

² UN MEA. 2003. Millennium Ecosystem Assessment, Ecosystems and Human Well-being; A Framework for Assessment.

“ecosystem services are the benefits people obtain from ecosystems, which the MA (*Millennium Ecosystem Assessment*) describes as provisioning, regulating, supporting, and cultural services. Ecosystem services include products such as food, fuel, and fiber; regulating services such as climate regulation and disease control; and nonmaterial benefits such as spiritual or aesthetic benefits.”

The National Park Service has been engaged in adaptive watershed management in the proposed action planning area since the formation of PRNS and GGNRA. The originating legislation of 1962 and 1972, followed by amendments in 1976 and 1978, subsequent directive by Secretary of the Interior Ken Salazar in 2012, and lastly the Consolidated Appropriations Act of 2019 combine to establish PRNS’ uniqueness in integrating grazing livestock and dairy farms into its mandate and mission to manage multiple resources.

The GMPA EIS and the requested action is a continuation of PRNS legislated and active implementation of watershed management including protection against adverse impacts to soil and water and facilitation of ecosystem services. From the outset, the preferred alternative B forms Ranchland and Scenic Landscape zones, and further employs a sub-zoning framework within the Ranchland zone, to support the management and protection of multiple resources and provision of goods and services. It goes on to set “desired conditions” for natural and cultural resources in each zone, combining 20-year leases, ranch operating agreements, and the comprehensive list of field-tested conservation practices in Appendix F to achieve those desired conditions. Confirmation that these practices support attainment of desired conditions in general is available through the US Department of Agriculture Natural Resources Conservation Service Conservation Effectiveness Assessment Program³. The proposed leases, ranch operating agreements and ranch subzoning are further underpinned and supported to achieve desired conditions by the application of Residual Dry Matter Mapping and Monitoring in Appendix E and Forage Model in Appendix K. The analysis conducted in each directly informs grazing livestock management prescriptions for PRNS staff and ranchers to use in achieving desired conditions for soil and grasslands in respective subzones.

Of specific interest and focus, given CCC staff’s recommendation for conditional concurrence, is obtainment of water quality desired conditions. Here again it useful to share that conservation practice effectiveness on grazing livestock ranches and dairies have been confirmed to improve water quality. A comprehensive scientific review of the conservation effectiveness of all range management practices funded through United States Department of Agriculture (USDA) conservation initiative programs provides a research synthesis to address specific hypotheses about the effectiveness of stocking rate moderation, grazing system selection, timing of grazing and rest from grazing, as well as a suite of riparian management practices to improve hydrologic function and water quality⁴. Similar summaries on the factors and benefits of conservation approaches and practices to manage waterborne pathogens in agricultural watersheds have been completed by the USDA Natural Resources Conservation Service⁵ and the World Health Organization⁶. These summaries present the considerable amount of research conducted

³ USDA NRCS CEAP 2021 -

<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/technical/nra/ceap/>.

⁴ Briske, D.D. 2011 -

<https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/nra/ceap/?cid=stelprdb1045811>

⁵ Atwill et al 2012 -

<https://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=32935.wba>

⁶ WHO, 2012 - https://www.who.int/water_sanitation_health/publications/animal_waste/en/

on the efficacy of beneficial management practices (BMPs) for both extensive (i.e., cow-calf rangeland grazing) and intensive (i.e., dairy farms) livestock production systems to reduce microbial contamination from these facilities. These on-farm BMPs typically rely on several common strategies that endeavor to be practical, affordable, and adoptable, such as the strategic use of vegetative buffers between grazing sites and adjacent bodies of water, riparian exclusion to livestock grazing several months prior to and during the rainfall season, adequate storage time and drying of manure solids prior to land application, vegetating or use of straw to cover the surface of cattle loafing areas during the rainfall season, and appropriate setback distances between sites receiving manure solids and adjacent downslope bodies of water. The GMPA EIS is in alignment with these summary findings, building upon longstanding stewardship efforts and conservation practices that have already occurred in the planning area with a clear process for PRNS staff and ranchers to collaborate on additional conservation practice planning and implementation of practices with documented effectiveness.

Confirmation of watershed scale improvements to water quality from conservation practice implementation on working farms and ranches is also available from regional and local watersheds. This includes published research in the planning area for both the Tomales Bay⁷ and coastal watersheds⁸⁹. These longer-term repeated measures studies of the relationship of indicator bacteria and un-ionized ammonia to conservation practice implementation demonstrate a decrease in both as practice implementation on working farms and ranches is executed. These longitudinal investigations of basin scale outcomes require forethought and a commitment of resources to be accomplished. Natural resource management agencies and entities often face budget constraints requiring them to forego these endeavors. Conventional wisdom when making fiscal decision to allocate available funds for implementation or long-term monitoring in watershed management leans toward implementation once that implementation has been confirmed to be effective. To have three of longitudinal studies in the region, two of which are in the planning area, is a unique opportunity. Combined, they provide confirmation that the GMPA EIS process is on track to maintain and increase improvements to surface water quality and in keeping with conventional wisdom for financial resource allocation, should prioritize that implementation.

Regulation of grazing livestock ranches and dairy farms in the planning area to protect water quality is the jurisdiction of the San Francisco Bay Region California Regional Water Quality Control Board (CRWQCB). Foundationally, this begins with the CRWQCB Basin Plan and protection of identified beneficial uses for respective waterbodies and watersheds. In 2004, the State Water Resources Control Board approved its Nonpoint Source Implementation and Enforcement Policy, providing the framework for the nine CRWQCB in the state to address NPS sources, including agriculture. Subsequently, the San Francisco Bay Region CRWQCB has approved the Conditional Waiver of Waste Discharge Requirements for Grazing Operations in the Tomales Bay Watershed¹⁰ and General Waste Discharge Requirements for Confined Animal Facilities Within the San Francisco Bay Region¹¹. Respectively, these regulatory programs require water quality management planning and implementation to be conducted by the grazing

⁷ Lewis et al 2019, <https://www.mdpi.com/2071-1050/11/19/5516/htm>

⁸ Voeller et al 2020, <https://doi.org/10.1016/j.rama.2021.02.011>

⁹ Meyer et al. 2019, <http://calag.ucanr.edu/archive/?article=ca.2018a0042>

¹⁰ CRWQCB 2018,

https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/agriculture/grazing/tomalesgrazing/2018webpageupdate/Tomales_Bay_Grazing_Waiver_Res_10-16-18.pdf.

¹¹ CRWB 2016,

[https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/agriculture/CAF/CAF%20General%20WDRs%20Order%20R2-2016-0031%20\(Complete%20with%20attachments\).pdf](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/agriculture/CAF/CAF%20General%20WDRs%20Order%20R2-2016-0031%20(Complete%20with%20attachments).pdf)

PG. 4 OF 4

operations and dairy farms in the planning area, including annual reports of progress made in adopting practices that are confirmed to contribute to water quality improvements. In the case of dairies, this also includes nutrient management plans determining how manure is handled and utilized as a fertilizer through best practices. At the San Francisco Region CRWQB meeting on April 14, 2021, these requirements and programs were summarized in a presentation to the Board and in the Executive Officer's Report, pages 5 through 8 (attached). This presentation and report describe how CRWCB staff conduct ranch and dairy inspections, how the ranches and dairies are complying with these regulatory programs, and the recommendations and plans for increased collaboration between CRWQCB staff, NPS staff, and ranchers through the implementation of the GMPA EIS. In addition to the CRWQCB role in regulating water quality, Tomales Bay and Drakes Bay Estero, are or have been regulated for water quality to meet the more stringent water quality requirements for shellfish production by the National Shellfish Protection Program and the California Department of Public Health (DPH). That commercial shellfish production and harvest is allowed is indicative that these water bodies meet water quality conditions, during a significant portion of the year, to allow for consumption of raw shellfish as confirmed by DPH annual sanitary surveys.

Summary

CCC staff, in its analysis of the proposed action, has been disciplined in its understanding and application of the California Coastal Act. Particularly, in its recognition of PRNS and GGNRA as reserved federal lands and its inquiry into potential "spillover effects". The GMPA EIS directly addresses CCC staff concerns for water quality and will be effective in achieving desired conditions for water quality, and other resources, because it will implement conservation practices that are confirmed at the practice scale to be effective and at the basin scale to result in beneficial impacts. The regulatory framework by the CCC's counterpart California Agency, CRWQCB, already is requiring annual reporting and direct interaction to confirm water quality improving practice implementation with PRNS staff and ranchers. Furthermore, Tomales Bay and Drakes Bay Estero, one of the planning area's coastal watershed, have documented conditions meeting stringent water quality to safeguard human health and support the beneficial uses of contact and non-contact recreation and raw shellfish consumption. For these reasons, the proposed action deserves your consideration and approval.

Thank you,



David Lewis
Director

Attachments:

Scoping comments dated November 30, 2018
Draft EIS review comments dated September 23, 2019
SFR CRWQCB Executive Officer Report dated April 14, 2021



UNIVERSITY of CALIFORNIA
Agriculture & Natural Resources

COOPERATIVE EXTENSION • SONOMA COUNTY

133 Aviation Blvd., Suite 109 • Santa Rosa, CA 95403-2810
 Tel. (707) 565-2621 Fax (707) 565-2623 4-H (707) 565-2681
 Master Gardeners (707) 565-2608 <http://cesonoma.ucdavis.edu>



April 18, 2005

John Muller, Chair
 San Francisco Bay Regional Water Quality Control Board
 1515 Clay St., Suite 1400
 Oakland, CA 94612

Subject: Pathogens in Tomales Bay Watershed: Proposed Basin Plan Amendment.

Dear John Muller:

Introduction

Thank you and the staff of the San Francisco Bay Regional Water Quality Control Board (RWQCB) for the opportunity to provide comment on the *Pathogens in Tomales Bay Watershed – Proposed Basin Plan Amendment* referred to as the Pathogen Total Maximum Daily Load (TMDL). Since the release of this draft document, I have participated in several public meetings to discuss its purpose and content. Your staff is to be complimented on their efforts to explain the document's intent and content, listen to community member concerns, and search for solutions to those concerns. This effort, and the ability of the Board to direct revisions to the TMDL, will be instrumental in creating a policy that is supportive of a community based approach to improve water quality within the Tomales Bay Watershed. I offer the following comments toward that aim.

Implementation Plan

The appropriate balance of flexibility and authority has been put forth in the TMDL Implementation Plan such that source category stakeholders know that compliance is mandatory through a number of self-selected options. Getting 100 % compliance with the implementation plan will require an inspection process similar to that already conducted by RWQCB staff on dairies for the RWQCB's Minimum Waste Discharge Guidelines. In the majority of cases, stakeholders have and are implementing practices to improve water quality with documentation of these efforts available through on-farm visits. In this way the stakeholders could have the option to be their own "third party" in a compliance inspection.

The TMDL contains a series of important and unanswered questions on page eight of the draft document. These questions speak to the uncertainty in this process regarding the proposed targets and allocations and the ability of the implementation plan to meet them. Only through monitoring of water quality and implementation activities can the RWQCB and the watershed community answer these questions and clear up this uncertainty. Therefore, it is critical that the RWQCB continue its monitoring program as described in the 2005 staff report.

Numeric Targets

The California Shellfish Protection Act of 1993 does not identify a shellfish harvesting area as threatened until it is closed more than 30 days a year. California Department of Health Services has designated the Tomales Bay shellfish harvesting areas as “conditionally approved” recognizing the seasonal nature of water quality conditions within the Bay. Through the Tomales Bay Shellfish Technical Advisory Committee (TBSTAC) and other watershed community based forums there has been public acknowledgement that a reduction in the number of closures days is the objective not “zero closures.” Given the alignment of these policies and approaches within the watershed, the TMDL should strive to support the TBSTAC by aligning targets and allocations.

A TMDL is admittedly developed with minimal scientific information and in a relatively short period of time. Because of these limitations, the resulting numeric targets should be considered and presented with the greatest acknowledgement of the inherent uncertainty. Unfortunately in the case of this TMDL, even with this uncertainty acknowledged, it is difficult to ignore or feel comfortable with the targets and load allocations. They are the basis for determining compliance and pose a significant risk to source category members and RWQCB from litigation if they are not met.

The concern over the targets and allocations could be removed if they could be written in a way that recognizes that beneficial use of shellfish harvesting can not be met 365 days a year. Staff has given much attention to the question of what concentration of indicator bacteria within tributary streams will provide for the required standard of 14 mpn/100ml for shellfish harvesting areas in the Bay (Figure 1). This includes the development and application of a hydrodynamic model to answer this question as presented in the March 2005 staff report. This is a logical line of questioning to ascertain values for the targets and allocations, with the determined value of 43 MPN/100ml based on the model results.

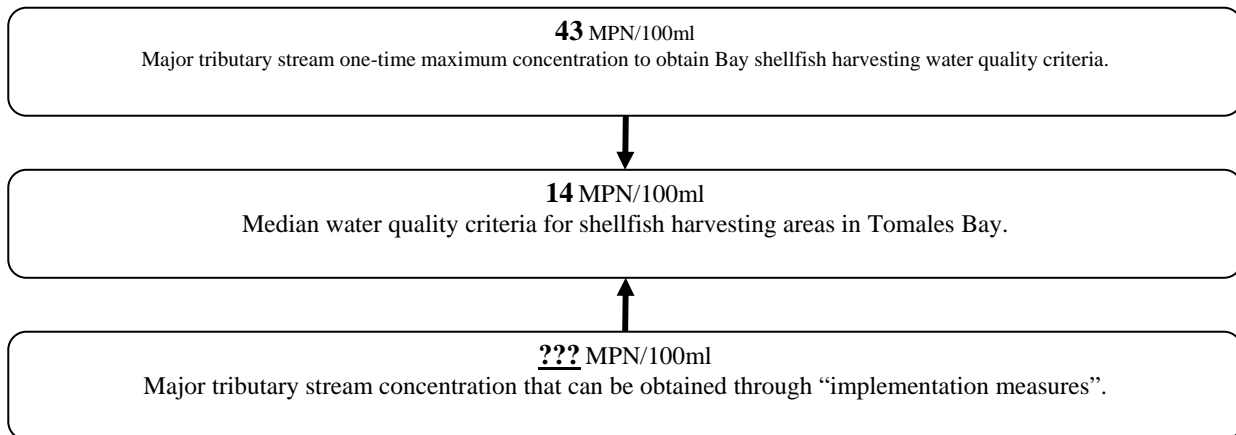


Figure 1: Framework for determining water quality targets and allocations for the Tomales Bay pathogen TMDL.

This number is daunting, not because of its low value, but because it is unattainable based on existing water quality data. In 1995 and 1996 the Tomales Bay TBSTAC conducted an *Investigation of Pollution Sources Impacting Shellfish Growing Areas in Tomales Bay*. I have included a portion of the data from the TBTAC report that represents the fecal coliform

concentrations from three identified “control watersheds” (Table 1). Two of these are on the east shore of the bay: 1) Milepost 36.17 entering Marconni cove; and 2) Milepost 38.54 entering cove on which Hog Island Oyster Company sits. The third site is White Gulch on the west shore of the Bay. In each case, the concentrations of fecal coliform are consistently greater than targets and allocations of 43 MPN/100ml. If water quality conditions in these control watersheds are above the proposed allocations, then it seems unrealistic to expect that values in watersheds with identified source categories could meet them. It is useful to note that these results provide an indication of what background concentrations for fecal coliform could be within Bay tributaries.

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or comparisons, to watersheds with more intense land use, provides us with an indication of background fecal coliform levels that can be used to set achievable TMDL targets and allocations.

Both the SWRCB and RWQCB have at their disposition the latitude to conduct a Use Attainability Analysis or set a Site Specific Criteria for Tomales Bay. This or other methods of setting targets and load allocations, such as the loading approach, could be used to answer the question: what major tributary concentrations for indicator bacteria can be obtained in the watershed (Figure 1). Answering this question will assist in setting targets and allocations that are realistic and achievable. It will also help form realistic expectations for the number of shellfish harvesting closures days that will exist if these targets and allocations are achieved. It most definitely would mean more effort, time, and collaboration between the California Department of Health Services and representatives of the source category stakeholders. In the end, however, the targets and allocations would be goals that the community would be motivated to achieve because they would believe that they could and should.

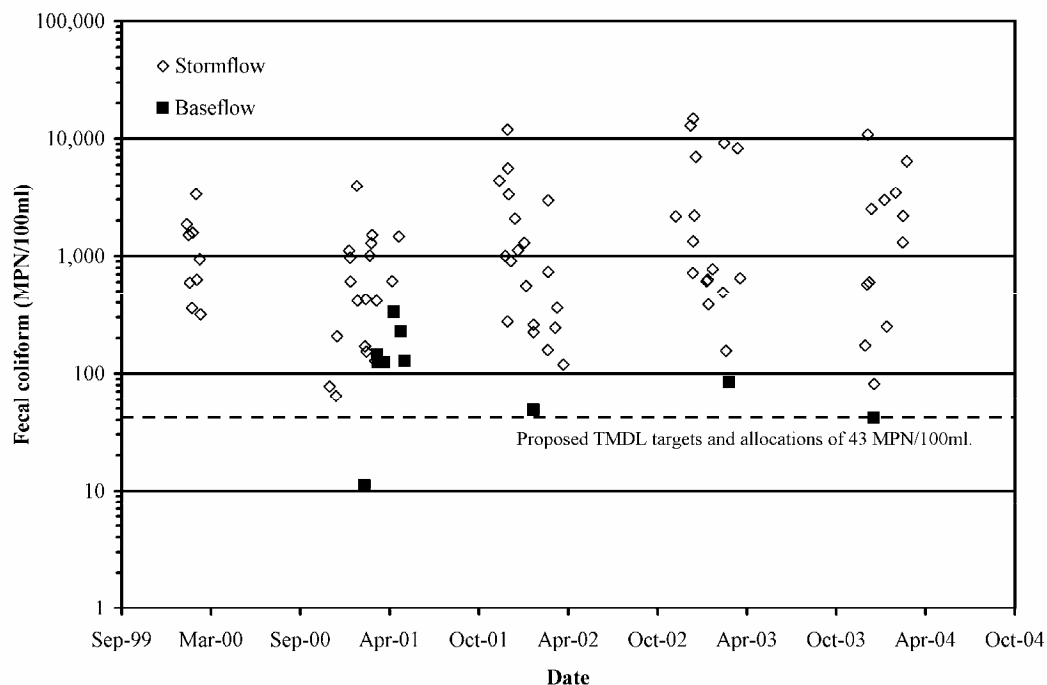


Figure 2: Fecal coliform concentrations from samples collected at Milepost 36.17 on the east shore of the Tomales Bay watershed from 1999 to 2004.

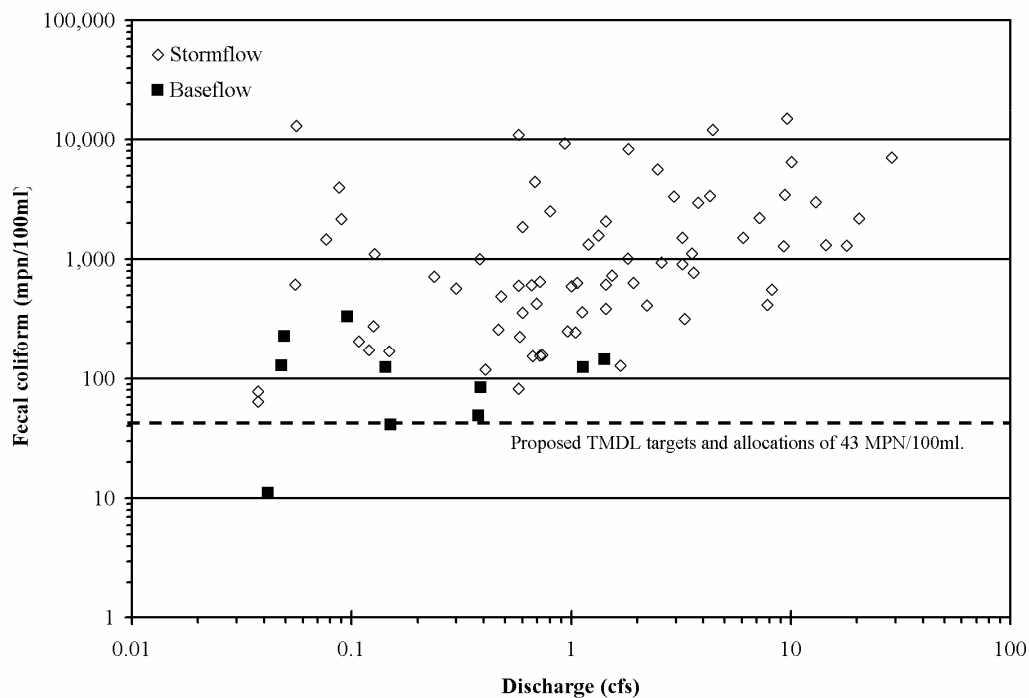


Figure 3: Relationship between fecal coliform concentrations and stream discharge for samples collected at Milepost 36.17 on the east shore of the Tomales Bay watershed from 1999 to 2004.

Thank you again for the opportunity to offer input on the draft basin plan amendment. Advisors from the University of California Cooperative Extension have partnered with RWQCB staff, the Natural Resources Conservation Service, and the Marin Resource Conservation District to develop and provide education on water quality improving practices and documentation methods. Additionally, we have directed research and facilitated group decisions toward the larger community goal of improving the Bay environment and community viability. We will continue to function in that collaborative role and look forward to working with the Board and its staff as you proceed with this TMDL.

Sincerely,

David J. Lewis
Watershed Management Advisor

xc: Farhad Ghodrati
Rebecca Tuden
Dyan Whyte

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 10th, 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 NH₃, a 15-17% reduction in VOC, a 16% reduction in CO₂e, and a 17% reduction in PM_{2.5}. 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 CO₂e 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 19th 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

From: Melissa Lema <mlema@wudairies.com>

Date: April 1, 2022 at 1:40:41 PM PDT

To: EORFC@coastal.ca.gov

Cc: Kirk Wilbur <kirk@calcattlemen.org>, Anja Raudabaugh <anja@wudairies.com>

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

Attached, please find written comments from Western United Dairies and the California Cattlemen's Association in regards to Agenda Item Th18a.

Please acknowledge receipt of these comments, and let us know if you have any questions.

Thank you,

Melissa Lema

Western United Dairies

(707)779-2214

mlema@wudairies.com

www.westernuniteddairies.com

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

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



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

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.¹ 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.²

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."³ 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."⁴

¹ Consistency Determination No. CD-0006-20, Condition II.

² Consistency Determination No. CD-0006-20, Condition IV.

³ Consistency Determination No. CD-0006-20, Condition I.

⁴ 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.”⁵

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,⁶ 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”⁷ 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.”⁸
- “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.”⁹
- 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.”¹⁰
- 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.”¹¹

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

⁶ 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.

⁷ Proposed Water Quality Strategy at 18.

⁸ Proposed Water Quality Strategy at 18.

⁹ Proposed Water Quality Strategy at 18

¹⁰ Proposed Water Quality Strategy at 22.

¹¹ 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.”¹²

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.¹³

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,¹⁴ 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

¹² Proposed Water Quality Strategy at 22.

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

¹⁴ 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.¹⁵

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."¹⁶ 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

¹⁵ Climate Action Strategy at 4.

¹⁶ 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 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", written in a cursive style.

Melissa Samet
Senior Water Resources Counsel
National Wildlife Federation



Marin Audubon Society

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

April 4, 2022

Donne Brownsey, Chair
California Coastal Commission
Via email

RE: Item #TH18a April 7, 2022; Consideration of NPS Water Quality Strategy and Climate Action Plan as required by Conditional Compliance Determination No. CD-0006-20 rap

Dear Chair Brownsey and Commissioners:

The Marin Audubon Society (MAS) appreciates the opportunity to comment on the National Park Service's (NPS) Conditional Concurrence considering a Water Quality Strategy and Climate Change Plan for the General Management Plan for Point Reyes National Seashore. We find the Strategy and Plan to be deficient in a number of ways as discussed below.

There are many unanswered questions about the Plan and Strategy. Uncertainties and questions include adequacy and effectiveness of the proposed actions in improving water and air quality and whether the ROA's monitoring and enforcement will be sufficient to protect the public interest in these lands.

It is our position that land should be retired to natural habitat if and when dairy ranchers wish to stop ranching. The Strategy and the Plan indicate that the intent is to replace dairy ranches with beef operations over time, with no opportunity to restore native ecosystems. This is not in the interest of the national park or the public.

CLIMATE ACTION STRATEGY

The Commission has required the NPS to present "a strategy on how to move forward reducing greenhouse gas (GHG) emissions from ranching operations in the GMPA."

The ROD and GMP report that the "Primary driver of air quality was and would continue to be regional and local sources" is probably valid. However, this does not minimize the contribution of the NPS to GHG emissions or excuse them from the responsibility to significantly reduce greenhouse gas (GHG) emissions at Point Reyes National Seashore (PRNS).

Comparing the NPS contribution to air quality with that of the regional sources is and should be an irrelevant analysis and comparison. The region is a large urban area and would be expected

to the primary driver. PRNS is a national park. It should be setting a GHG emissions target that is significantly lower. If any comparisons are to be made, they should be comparing the Seashore with other national parks.

The Plan states that the Strategy would reduce emissions to 17% of agricultural emissions in Marin County. Actually, we think 17% of emissions from a national park is unacceptably high and should be further reduced.

The key action on which both the Plan and the Strategy are based is the decision by the McClure's to discontinue dairy ranching. Benefits from this action are claimed for both air and water quality. However, it is not clear how extensive those the benefits will be. Dairy operations, once closed, could or would be converted to beef ranching. There is no apparent provision for them to be returned to a natural ecosystem. The action that would provide the most benefit for water quality and air quality, for soil, native vegetation, and wildlife is to return the land to natural ecosystem.

While converting to beef ranching is expected to result in fewer impacts than dairy ranching, the former still causes impacts to native habitats and wildlife.

Other actions proposed by the NPS and uncertainties and inadequacies about them include:

- 1) Reduce planting of forage crops. There would still be approximately 168 acres in forage crops. MAS believes that forage crops are not appropriate for a national park such as the PRNS.
- 2) Reduce manure and nutrient management acres to 1,800. This is still a significantly large acreage. MAS believes that this is not an appropriate land use for the PRNS.
- 3) Reduce diversification with phased removal of an existing 2,900-chicken operation, removal of row crops, and all commercial chickens from diversification list. However, chicken operations could still be approved with environmental review under NEPA, paid for by the ranchers. Other small animals (goats, pigs, etc.) would apparently still be allowed without review, which would result in environmental impacts. MAS is opposed to all the diversification as adding inappropriate land uses.
- 4) Shifting from guidelines to mandatory requirements in ROA agreements. Requirements are better than guidelines. However, the effectiveness of mandatory requirements depends on compliance, monitoring, and enforcement, which have been inadequate in the past. We want to see assurances that requirements and compliance with them are adequate.
- 5) If ranchers are unable or unwilling to modernize or convert to beef, they would have to cease dairy operations within two years. However, it is unclear what would happen to the land in that case. We suggest that the option of re-wilding the land be possible.
- 6) We assume that the issuance of long-term permits would facilitate investments in activities that would reduce impacts to air equality. However, that is yet to be demonstrated.
- 7) Annual reporting will be instituted, but must be followed by enforcement actions for infractions.

WATER QUALITY STRATEGY

That the Water Quality Monitoring Program and sampling protocols have been developed by the Regional Water Quality Control Board is assuring as the Board scientists have years of experience overseeing the Bay Area's water quality. However, adequate follow-up and enforcement by the NPS is needed.

We understand that the development of an actual water quality strategy is delayed due to lack of data. We ask, has the NPS not collected any data the last 20 years, that they could use establish preliminary priority areas now? Development of a water quality strategy should not be put off.

Ranching related infrastructure and management practices that would be required to be installed and/or used should be identified along with the timing of installation and implementations. For example, what would the expected time line for installing infrastructure to protect wetland and riparian habitats?

Most of the operational changes are expected to have water quality benefits in addition to air quality. These include converting to beef, phasing out manure spreading, and reducing chicken production. Impacts of beef operations, although fewer than dairy ranching, will still occur. The Plan and Strategy should identify the impacts and discuss how these impacts will be addressed.

The frequency for submitting the required Implementation Reports should be stated along with who the reports will be submitted to. Will they be available for public review?

In terms of ongoing management of ranches, oversight and regulation by the Water Board will benefit water quality. However, until the NPS establishes trust that it can adequately ensure natural resources are protected in its management and oversight of ranches, it is important that the Commission retain oversight

Sincerely,



Barbara Salzman, Co-chair
Conservation Committee

PO Box 103
Forest Knolls, CA 94933
415.342.7956



Web: 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

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 dark ink, reading "Megan Isadore". The signature is written in a cursive, flowing style.

Megan Isadore
Executive Director

MISSIONREWILD

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

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

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.

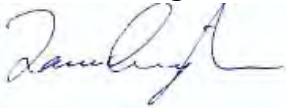
Recommendation: The Commission should not approve the NPS March 24, 2022, Water Quality Strategy for the General Management Plan Amendment for Point Reyes National Seashore and North District Golden Gate National Recreation Area, on the grounds that it is not consistent with Condition I of the Commission's 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 placed over a light blue rectangular background.

California Director
Western Watersheds Project
Cima CA 92323
Mailing: PO Box 70
Beatty NV 89003
775-513-1280
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.**¹

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.**² 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

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."

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**

Thomas Wheeler
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

Robin Chiang
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

Mark J Palmer
Associate Director
**International Marine
Mammal Project, Earth
Island Institute**

Jill Fortin
Director
Jay Witcher Orchestra

Jennifer Hadley
Owner
**Jennifer Hadley
Photography**

Jim Zipp
Owner
Jim Zipp Photography

John Comisky
Owner
John Comisky Photo

Julie Picardi
Owner
Julie Picardi Photography

Keith Flood
Owner
Keith C. Flood Photography

Kimberly Baker
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

Carbon Cycle Institute

DATE: 4/1/22

TO: California Coastal Commission

ATTN: Kate Huckelbridge, Senior Deputy Director
Cassidy Teufel, Manager

FROM: Carbon Cycle Institute

RE: Consistency Determination No. CD-0006-20, National Park Service, 2020 General Management Plan Amendment for PRNS and the North District of GGNRA

Dear Commissioners;

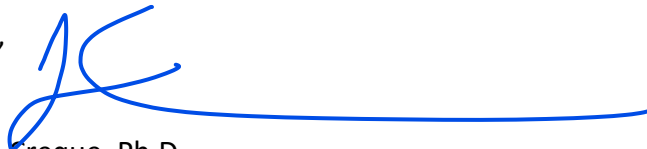
This letter is to urge Coastal Commission approval of the National Park Service's First Year Version of the NPS Water Quality Strategy and Climate Action Strategy for the General Management Plan Amendment for Point Reyes National Seashore and North District Golden Gate National Recreation Area.

As noted by PRNS Superintendent Kenkel in his March 24, 2022 letter to the Commission, future iterations of the strategies, and/or annual reporting to the Commission, will contain more specificity with respect to implementation actions. Given the very short timeline within which NPS has had to respond to the CCC request to develop these inherently complex strategies, we are impressed by the breadth and depth of the proposed approaches.

There are significant opportunities to engage PRNS/GGNRA in climate-beneficial agricultural practices to support both NPS natural resource management goals and Marin County Climate Action Plan objectives and potentials outlined in the Marin CAP. We look forward to working with Superintendent Kenkel to inform future iterations of both strategies.

The First Year Version of the NPS Water Quality Strategy and Climate Action Strategy for the GMP Amendment for PRNS and North District GGNRA are consistent with Conditions I and II of the Commission's conditional concurrence with Consistency Determination No. CD-0006-20 and should be approved.

Sincerely,



Jeffrey A. Creque, Ph.D.

Director, Rangeland and Agroecosystem Management

CC: David Lewis, UCCE Marin

Nancy Scolari, Marin RCD

Stephen Parnay, Marin Agricultural Commissioner

Craig Kenkel, Superintendent, PRNS

245 Kentucky Street, Suite BI Petaluma, CA 94952

Email: info@carboncycle.org www.carboncycle.org

CD-0006-20
(National Park Service)

UPDATED
August 24, 2022

CORRESPONDENCE

Form Letters

Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-20
(National Park Service, Marin County)

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.

Reject the Conditional Compliance to Point Reyes GLMPA

Dear Executive Director John Ainsworth,

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

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

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

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

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

This item is a form letter received from 8 separate contacts:

Further Inquiry Needed Before Signing Away Point Reyes National Seashore

Dear Executive Director John Ainsworth,

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

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

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

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

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

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

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

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

CD-0006-20
(National Park Service)

UPDATED
August 24, 2022

CORRESPONDENCE

Individual Emails

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

James Coda
2009 Falcon Ridge Drive
Petaluma, CA 94954

March 31, 2022

VIA EMAIL

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

Re: Second Request for Recusal of Katie Rice in 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:

By letters dated January 7, and April 4, 2021, I wrote to the Coastal Commission that Commissioner Katie Rice should be recused from any matters involving Agenda Item 0006-20, the National Park Service's (NPS) Coastal Consistency Determination (CCD) for ranching at Point Reyes National Seashore and Golden Gate National Recreation Area. Today, I again request that Commissioner Rice be recused.

Commissioner Rice's Conflict of Interest

My reason for requesting recusal on January 7, 2021, was that Commissioner Rice had a clear conflict of interest because she was a member of the Marin County Board of Supervisors which had already voted (including Ms. Rice) in favor of NPS's preferred alternative for ranching during the EIS public comment period, well before it came before the Coastal Commission for concurrence. At that point Ms. Rice, having voted with her colleagues on the Marin Board in favor of NPS's preferred alternative, became conflicted with respect to that matter ever coming before the Coastal Commission. By letter dated April 4, 2021, I supplemented my recusal request with a copy of the Marin County Board's January 5, 2021, formal letter to the Coastal Commission stating that the Marin County Board wanted the Coastal Commission to approve NPS's preferred alternative which was incorporated into its Coastal Consistency Determination (CCD). Those letters are part of the administrative record.

I never received a response to either of my letters, and Commissioner Rice cast the deciding Coastal Commission vote in last April's 5 to 4 conditional concurrence. If

she had been recused, as she should have been, the vote would have been 4 to 4 and the result would have been an objection to NPS's CCD. At that point, with my not receiving any responses to my letters and Commissioner Rice's vote, I concluded that the whole Coastal Commission process was not an open one and it was a failure in fundamental fairness and due process.

I am again requesting¹ that Commissioner Rice be recused from any activity regarding the hearing set for April 7, 2022, for the same reason as a year ago. She continues to have a clear conflict of interest.

As a general matter, anyone in Commissioner Rice's position should have been then, and should be now, recused. Normally, whenever a person is on a board or commission and the agenda contains an item that that person has some stake or interest in, that person leaves the meeting while that item is dealt with. But there are more than general principles involved here. The Coastal Act itself, which each commission member and each staff person has a duty to follow and enforce, requires Commissioner Rice's recusal.

The Coastal Act provides in pertinent part as follows:

ARTICLE 2.5. Fairness and Due Process

30320.

(a) The people of California find and declare that the duties, responsibilities, and quasi-judicial actions of the commission are sensitive and extremely important for the well-being of current and future generations and that the public interest and principles of fundamental fairness and due process of law require that the commission conduct its affairs in an open, objective, and impartial manner free of undue influence and the abuse of power and authority. It is further found that, to be effective, California's coastal protection program requires public awareness, understanding, support, participation, and confidence in the commission and its practices and procedures. Accordingly, this article is necessary to preserve the public's welfare and the integrity of, and to maintain the public's trust in, the commission and the implementation of this division.

¹ In 2021, I addressed my two letters to the "California Coastal Commission" and sent the letters to the special email address created for this agenda item and to John Weber, the staff person handling the agenda item, with a copy to Commissioner Rice. As I stated above, I received no response. This time, while still addressing the letter to the Coastal Commission, I am emailing the letter to everyone at the Coastal Commission that seems relevant in the hope that it will cause the Coastal Commission to finally act on the matter.

(b) The people of California further find that in a democracy, due process, fairness, and the responsible exercise of authority are all essential elements of good government which require that the public's business be conducted in public meetings, with limited exceptions for sensitive personnel matters and litigation, and on the official record.

CA Pub Res Code § 30320. (Emphasis added.)

First, the Coastal Act states that when a Coastal Commission member makes a decision, he or she acts in a “quasi-judicial” manner. That means Coastal Commissioners are to act like judges, not like legislators as in the U.S. Congress, the California Legislature, or a County Board of Supervisors. Members of regulatory bodies must always act in that manner. As judges, the role of each Commissioner is to (1) review the relevant facts before the Commission, (2) apply the Coastal Act and any other relevant laws to those facts, and (3) make an objective decision based on those facts and the law. While legislators can hear from anyone about what they would like legislators to do, like what bills should or shouldn't be passed, judges are only to apply facts to law and render decisions objectively. Commissioner Rice did not do that in her role as a commissioner. Ms. Rice's mind was made up long before the Coastal Commission hearing that she would vote according to the position of the Marin County Board of Supervisors (which was also her own position), not in the interests of the Coastal Commission in her quasi-judicial role as one of the commissioners bound to administer and enforce the Coastal Act. And that is how she voted on April 22, 2021. There is no reason to assume she will act in any other way now. For this reason alone, Commissioner Rice should be recused.

Second, the statute provides that “the public interest and principles of fundamental fairness and due process of law require that the commission conduct its affairs in an open, objective, and impartial manner free of undue influence and the abuse of power and authority.” (Emphasis added.) Commissioner Rice's decision last April was not rendered in an “objective, and impartial manner free of undue influence and the abuse of power and authority.” She voted according to the position of the Marin County Board of Supervisors (including herself), not in an “objective and impartial way.” She was not “free of undue influence” because the other members of the Marin County Board of Supervisors expected her to represent their position.² As a continuing member of the Marin County Board of Supervisors, which supports the preferred alternative and its incorporation in the NPS CCD, Ms. Rice continues to be unable to approach this matter in an open, impartial, and objective manner and free of undue influence. For this reason alone, Commissioner Rice should be recused.

² Commissioner Rice also had an ex parte conversation with Congressman Huffman who is on record as supporting NPS's preferred alternative. This is discussed further below.

Third, the Act states that “to be effective, California’s coastal protection program requires public awareness, understanding, support, participation, and confidence in the commission and its practices and procedures. Accordingly, this article is necessary to preserve the public’s welfare and the integrity of, and to maintain the public’s trust in, the commission and the implementation of this division.”

(Emphasis added.) Many who participated in last April’s Coastal Consistency process believed Commissioner Rice should have been recused because she was a member of the Marin County Board of Supervisors, which supported NPS’s position, and her mind was already made up. That the Coastal Commission allowed Commissioner Rice to participate in Agenda Item CD-00006-20 last April caused many members of the public to lose “confidence in the commission and its actions and procedures.” Nothing has occurred since then to change that perception. For this reason alone, Commissioner Rice should be recused.

Finally, subsection (b) of 30320 provides that “in a democracy, due process, fairness, and the responsible exercise of authority are all essential elements of good government which require that the public’s business be conducted in public meetings . . . and on the official record.” “[D]ue process, fairness and the responsible exercise of authority” required that my request that Commissioner Rice be recused should have been decided in a public meeting and on the official record. I know of nothing in the record to show that my request that Commissioner Rice be recused was presented to the Commission, let alone considered by it.

For the foregoing reasons alone, Commissioner Rice should be recused on the basis of conflict of interest. But there is more.

Commissioner Rice’s Ex Parte Communication Problem

The California Coastal Act raises another matter that can be a problem for coastal commissioners, namely ex parte communications.

Article 2.5 Fairness and Due Process

Section 30324

(a) No commission member, nor any interested person, shall conduct an ex parte communication unless the commission member fully discloses and makes public the ex parte communication by providing a full report of the communication to the executive director within seven days after the communication

(b) (1) The commission shall adopt standard disclosure forms for reporting ex parte communications which shall include, but not be limited to, all of the following information:

(C) **A complete comprehensive description of the content of the ex parte communication**, including a complete set of all text and graphic material that was part of the communication.

(Amended by Stats. 2014, Ch. 125, Sec. 1. (AB 474) Effective January 1, 2015.)
(Emphasis and bolding added.)

This provision does not so much encourage ex parte communications (“[n]o commission member shall conduct an ex parte communication unless”) as it requires that if those conversations occur, they must be reported publicly and in detail. Four of the twelve voting members of the Commission have taken the position publicly that they will not accept requests for ex parte communications. See the Roster Page of the Coastal Commission’s website. This insulates them from any claim in the future that they may have had an inappropriate ex parte communication and sends a clear message to those that might try to influence their decisions.

The Coastal Commission itself has interpreted the ex parte section of the Coastal Act as follows:

The coastal act does not authorize ex parte communications that relate to alleged violations of the coastal act and such communications are not permissible.

<https://www.coastal.ca.gov/roster.html> (Emphasis added.)

This legal interpretation by the Coastal Commission informs each commission member, especially those who are open to ex parte communications, that such communications are prohibited if they get into matters where there is an alleged violation of the Coastal Act. This prohibition would seem to cover NPS’s 2021 CCD and the issues before the Commission now. There can be no doubt but that the public claims NPS’s 2021 CCD and NPS’s position today, violate the Coastal Act.

Not only did Commissioner Rice have a conflict of interest, but she had an ex parte communication with local Congressman Jared Huffman who is on record as supporting NPS’s plan to expand ranching. For example, in supporting the preferred alternative to increase ranching described in the Draft EIS, Mr. Huffman made clear his intent that ranching be not only continued but expanded and that the elk only be allowed in the fenced Tomales Point area (where 250 elk have starved to death in the past two years) and the Limantour area and that elk and ranching be separated (no Drakes Beach herd). See comment #7571 at

https://www.nps.gov/pore/getinvolved/upload/planning_gmp_amendment_deis_public_comments_5027-7624_200302.pdf.

Below is Commissioner Rice's statement as to that ex parte communication:

Comprehensive Description of Communication Content:

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

(Emphasis and bolding added.)

Ms. Rice never specifically states what Congressman Huffman said or may have asked of her. Her statement is essentially in the first person with one important exception: "We discussed at a high level the primary issues being raised by the public around the plan." (Emphasis added.) That is not a "complete, comprehensive description of the ex parte communication" required by 30324 (b)(1)(C). The public is entitled to know what that "high level" discussion of the "primary issues" was all about. What did Congressman Huffman say? The public is well aware, by statements Congressman Huffman has made over the years, not to mention his statement in his comment letter on the DEIS above, that he wants whatever NPS and the ranchers want, including getting rid of the elk in the ranching area. The public has a right to know what Congressman Huffman said and how Commissioner Rice responded. Did he ask her how she would vote? Did

he ask her if she knew how the other commissioners were likely to vote? Did he ask her if she thought he should talk to any other commissioners?³

In addition to § 30324, § 30320, discussed above, provides that good government “require[s] that the public’s business be conducted in public meetings . . . and on the official record.” Ex parte communications are, by definition, not public meetings. Furthermore, they aren’t on the official record. The record is just whatever the commission member states as having taken place. They are the antithesis of “public meetings . . . on the official record.”

Ms. Rice needs to recuse herself, or be recused, to avoid a conflict of interest or, at the very least, the appearance of a conflict of interest in this quasi-judicial proceeding. In addition, Commissioner Rice failed to comply with the Coastal Act by not making a “complete comprehensive description of the content of the ex parte communication.”

It is the Coastal Commission’s statutory duty to administer and enforce the Coastal Act’s conflict of interest and ex parte communication provisions. Commissioner Rice should also be excluded from any meetings among commissioners regarding the subject agenda item because her presence could inhibit free discussion of the agenda item and influence voting. It is standard practice for a conflicted person to leave the room when the matter arises that causes the conflict. If Commissioner Rice is not recused, it will damage the reputation of the Coastal Commission.

Sincerely,

s/James Coda

cc: John Ainsworth
Kate Huckelbridge
Cassidy Teufel
Commission Members
Craig Kenkel

³ According to the April 22, 2021, agenda, Congressman Huffman had ex parte communications with four of the eight commissioners who accept them. Four of the current twelve voting members do not accept ex parte communications.

From: Kenneth Bouley
34 Drakes Summit Road
Inverness California 94937
(415) 259-1332
kennethbouley@gmail.com

To: California Coastal Commission

CC: U.S. Interior Secretary Deborah Haaland
Shannon A. Estenoz, Assistant Secretary for Fish and Wildlife and Parks
Cindy Orlando, Principal Deputy Regional Director - National Park Service
U.S. Representative Jared Huffman (CA-2nd district)
Point Reyes Superintendent Craig Kenkel

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

Thank you for receiving my comments regarding April 2022 Agenda Item Thursday 18a - CD-0006-20 (National Park Service, Marin County.) As a concerned, local citizen, I have closely read the various relevant publications and correspondence from the Park Service. I paid particular attention to one water quality study generated and leveraged by the Park Service in their process and obtained detailed raw data regarding that study via a request under the Freedom of Information Act (FOIA).

I don't believe the Park Service will be able to adequately improve water quality in the Seashore and I further think they are representing an overly optimistic view of their prospects for doing so. Specifically, the Park Service fails to acknowledge the known, steep decline in BMP effectiveness over time and instead cites their own, flawed study which exaggerates and misrepresents findings. The willingness to misrepresent is hard to miss and, in my opinion, casts doubt on the overall motives and objectivity of the materials. ***Details are in the postscript below.*** I specifically call the attention of Commissioners Gold, O'Malley, and any Commissioner interested in the details regarding Best Management Practices and the Park Service's analysis.

The Park Service does not have a strong record regarding enforcement of existing leases and permits in Point Reyes. Many of us are still waiting to hear if there will be any consequences whatsoever for the ranch leaseholder who was found to have illegally bulldozed a 900-foot path through native vegetation and into a creek supporting endangered species, in clear violation of his existing lease. (Marin IJ, "Point Reyes National Seashore: Ranch illegally bulldozed habitat."¹) This incident occurred in the Coastal Zone. Note it was the leaseholder himself who admitted to running the bulldozer and not, for example, a new employee who might not have known better. Note the incident was discovered by a member of the public, not by the Park Service. Note the very creek involved in the incident is referenced in the Park Service's water quality study as standing to improve via future BMP implementation.

Similarly, as far as I am aware, there has been no public notification of the consequences, clean-up, or related costs regarding the discovery (again by a private citizen, not by the Park Service) of a toxic dump

¹ <https://www.marinij.com/2021/08/29/point-reyes-national-seashore-ranch-illegally-bulldozed-habitat/>

on E Ranch in the Seashore. (“Old dump site prompts park investigation.”²) I believe the dump site is in the Coastal Zone. In my opinion, the Park Service feigned surprise — “While it is common for ranch operations to have a small area of material storage, the nature and scale of this accumulated debris is concerning,” said Melanie Gunn, a spokeswoman for the park³ — but the site had been there for decades according to satellite imagery.

I note that recently there have been reports of issues with the septic systems at ranch buildings in the Seashore. It is my understanding that maintenance of septic systems is the responsibility of the leaseholders. Here is another example where we can learn whether or not the NPS is inclined to enforce the existing rules, such as they are. Ordinary citizens like me have not enjoyed transparency in the management of our park. Many of us are jaded to “no comment” type replies from NPS and are learning to use the FOIA, as arduous and slow as that process is.

If NPS will not punish egregious violations of policies already in place, it would be naïve to think they will start anytime soon.

I recommend the Commission to be aware that the National Park Service is under immense pressure to continue ranching in Point Reyes in the form of lobbying and influence from, among others, the Marin County Board of Supervisors (which has close ties with ranching interests in Point Reyes), Senator Diane Feinstein, and Rep. Jared Huffman (CA 2nd district, which includes Point Reyes National Seashore), who has acted out-of-character with his green reputation from the start in Point Reyes. Some of the committee members already received ex parte communications from Rep. Huffman and may well do so again. The Congressman has been supporting continued ranching in Point Reyes, including attempts to change the park charter (see his failed bill H.R. 6687⁴) prior to the Environmental Impact Statement publication.

Under such pressure from powerful places, it is perhaps unsurprising that the Park Service has so far done next to nothing to improve the environment at Point Reyes which was not court-ordered or in some other way inescapable. Their recent attempt to stonewall the Coastal Commission by declining to meet previously agreed conditions is yet another example. I’m grateful that the Commission did not accept the obvious excuses and I urge the Commissioners to scrutinize what must be, under the circumstances, a hastily assembled attempt to check the bare minimum number of boxes.

I realize the Commission is not a political body and has a specific and constrained set of duties. However, this is also theoretically true of the National Park Service, which appears unwilling or unable to execute its duty regarding Point Reyes. I sincerely hope the Coastal Commission exerts its full influence strictly and conscientiously and does no rubber stamping. I urge the Commission to reopen and reverse the narrowly approved determination of consistency for the National Park Service’s General Management Plan Amendment regarding the future management of ranching in Point Reyes National Seashore.

Thank you.

Sincerely,

² <https://www.ptreyeslight.com/news/old-dump-site-prompts-park-investigation/>

³ Ibid.

⁴ <https://www.congress.gov/bill/115th-congress/house-bill/6687>

Kenneth Bouley
Inverness CA 49937

P.S. Below is a more **detailed analysis** of the Park Service's unsupported claims regarding expectations of future improvements in water quality in the Seashore. I would be happy to discuss any aspect of my review with any Commissioner.

In its March 4, 2022, letter to the California Coastal Commission,⁵ the Park Service wrote to the Commission, "Changes related to more robust requirements for ranch operations and additional restrictions on diversification activities will increase the certainty of water quality protections and reduce environmental impacts from dairy operations and forage production." [emphasis added]

But *there is no such certainty*, and in fact the opposite is apparent. Recall that the Final Environmental Impact Statement (FIES) prepared for the General Management Plan Amendment⁶ (GMPA) specifies, "Under alternative F [removing ranching], impacts on water quality would be noticeable, long term, and beneficial because ranching activities would be phased out across the entire planning area." (GMPA, page vii), whereas "Alternative B [the selected plan] 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." (GMPA, page 135). This much is as per the Park Service.

Yet by the time the Record of Decision⁷ (ROD) was issued, the story had changed: "Implementation of the selected action and the measures discussed above will result in continued improvements in water quality in the planning area, consistent with trends that have been documented through long-term monitoring (Lewis et. al. 2019⁸ and Voeller et. al. 2021⁹)." (ROD, p D-9) [emphasis added]

Unacknowledged Diminishing Returns: The Park Service omits the fact that the cited papers explicitly characterize the impacts of the evaluated BMPs as exhibiting a steep decline of effectiveness over time. For example, the discussion in the Lewis paper states:

An interesting aspect of our findings is that, while the downward trend observed across grazed sites was significant across the entire period (Figure 4), there was a notable reduction in fecal coliform concentrations with the completion of the 1999-2006 BMP phase ... Comparing the 1999–2006 mean (1906) to the 2007–2017 mean (291), it appears that the initial prioritization and implementation of BMPs was associated with a mean reduction of fecal coliform by 1615 cfu/100ml—an 85% mean reduction that persisted throughout the remainder of the study period... (pp 7-8).

⁵ CD-0006-20 – National Park Service, Point Reyes National Seashore - Update and Request for Extension of Time for Presentation of Water Quality Strategy for Commission Review. Superintendent Craig Kenkel to Executive Director John Ainsworth

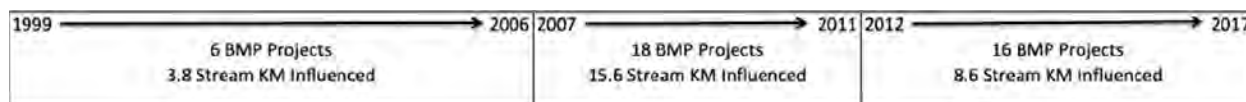
⁶ https://www.nps.gov/pore/getinvolved/planning_gmp_amendment.htm

⁷ <https://www.nps.gov/pore/learn/news/newsreleases-20210913-gmp-amendment-rod.htm>

⁸ <https://www.mdpi.com/2071-1050/11/19/5516>

⁹ <https://bioone.org/journals/rangeland-ecology-and-management/volume-76/issue-1/j.rama.2021.02.011/Improved-Microbial-Water-Quality-Associated-with-Best-Management-Practices-on/10.1016/j.rama.2021.02.011.short>

Here is Figure 2 from the Lewis paper:



So, 85% of the benefit was achieved in the first 42% of the effort measured by time, the first 15% of the effort measured by number of BMPs, and in the first 14% of the effort measured by length of fence influenced.

When the Park Service claims additional BMPs will cause a similar trend in water quality impacts, what trend do they mean? They presumably mean to imply water will continue to improve to a point where it meets standards (a speculation), rather than to imply that BMPs get progressively more expensive and less effective (the actual trend).

The Lewis paper states, "Fencing to limit or exclude cattle access to stream corridors has been shown to be highly effective in improving water quality and riparian habitat" (p. 7) and "All six BMPs implemented between 1999 and 2006 were stream corridor fencing (3.8 km), with five of the six projects directly eliminating cattle access to approximately 90% of the mainstem of Olema Creek." (p. 8) In the Voeller paper, more than half the BMPs (16/30) were fencing, and another 20% (6/30) involved water lines and/or troughs designed to keep the cattle out of creeks.

Although the Lewis paper discussion concludes their findings emphasize the need to prioritize BMP implementation, another clear conclusion is that fencing or coaxing cattle out of creeks (with artificial water sources) is by far the most cost-effective BMP, and then further improvements become increasingly more difficult to achieve.

In their comments to the draft GMPA/DEIS, the San Francisco Regional Water Board put it this way:

Technical or financial infeasibility of implementing appropriate BMPs, management or mitigation measures to eliminate or reduce impacts: In some Ranch Core locations, the suggested mitigation measures, such as "comply with requirements in the General CAF permit" may not be adequate. For example, the requirement to eliminate stormwater run-on into areas containing waste products, may be technically or financially infeasible. In the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS.¹⁰ [emphasis added]

The Voeller paper has several other significant problems:

Inappropriate before/after approach: The paper implements a before and after comparison in its discussion (for example, "Overall, for the analysis by station, FIB below the water contact recreation numeric objective increased sixfold, from 0.06 to 0.38 of all samples after 2006..." (p 147). However, "before" and "after" were not determined relative to an effort to identify the expected effective dates of any of the Best Management Practices (BMPs), but rather were determined by the date at which the sampling switched from measuring fecal coliform (FC) to measuring Escherichia coli (EC), as part of a

¹⁰ General Management Plan Amendment: Draft Environmental Impact Statement: Public Comments, comment #7018. https://www.nps.gov/pore/getinvolved/planning_gmp_amendment_deis_public_comments.htm

discipline-wide trend.¹¹ In other words, “before” and “after” are not defined as before and after anything that matters. A FOIA request asked for “The records containing information about why the water quality samples referenced in Voeller et al. (2021a) were split up and evaluated as years 2000-2006 and then 2007- 2013,” but this request was unaddressed in the FOIA response.¹² In fact, an arbitrary dividing line would have likely been better because it would not have introduced or amplified any inaccuracy or variability in the conversion of FC to EC as a potential source of error in the results. In other words, if the method of converting the FC measures to EC includes any error, using that as the dividing line makes the most of the error and convolutes results.

Poorly defined and quantified explanatory variables: The explanatory variables in the Voeller paper (the putative causes of the measured improvements) are BMPs implemented over the study period (2000-2013). But there are only 30 BMPs in scope, across three watersheds, and they are arbitrarily defined and quantified. For example, 16 of the 30 BMPs involve fencing, but there is no effort to consider length or placement of the fence, number of animals excluded, etc. Neither do the authors know with any degree of certainty when the projects began and ended relative to the water quality measures which they allegedly improved. The same FOIA request asked for BMP project start dates and completion dates. The National Park Service’s response included only estimated completion year for the projects. Responses for 12 of 30 (40%) BMPs say things like “Completed by 3/2010 based on imagery,” meaning the project was done just some time before a certain year estimate. In other words, there is no knowledge of whether this BMP affected just the after results, or the before and after results. If it affected both, it is obviously not the cause of the measured improvements. For three of the 30 BMPs, the completion estimation dates are a three-year spread. The same FOIA request asked for “The expected timeframe for effectiveness of BMPs to be measurable,” but this item was unaddressed in the FOIA response.

The arbitrariness of the before and after dividing line and the paucity of the BMP data point to a longitudinal study (with realistically represented trend lines) rather than a before/after study.

Paucity of data and omitted explanatory variables: As mentioned, there were only 30 (arbitrarily defined) BMPs implemented over the study period, with unknown effective dates. These BMPs were implemented in three watersheds. For two of the three, there was a significant uncontrolled variable as admitted by the authors:

“Changes in management not documented in this study could have also contributed to reductions in FIB concentrations. This included conversion of the dairies to organic operations (two in 2006 and one in 2011). General changes associated with this conversion included overall reduction of herd sizes and adherence to a number of regulatory requirements under the National Organic Program...” (p 147)

Conversion of some operations to the organic standard is an uncontrolled variable affecting two of the three watersheds with BMPs over the study period. Elsewhere in the results we learn that “at the

¹¹ “However, *Escherichia coli* (EC) is a better measure of coliform bacteria risks to human health than total or fecal coliform (FC) (Edberg et al. 2000), and as demonstrated by Derose et al. (2020), regulatory numeric targets for FC can overestimate fecal contamination as compared with EC. Consequently, many microbial water quality monitoring programs have shifted their FIB measurements from FC to EC over the past few decades (Cude 2005; Garcia-Armisen et al. 2007; Rasmussen and Ziegler 2003).” P 140.

¹² FOIA DOI-NPS-2021-00S315. Center for Biological Diversity to: National Park Service.

watershed scale, the FIB reduction was more pronounced for those containing dairies (98%) when compared with the watershed with a single beef cattle operation (71%).” (P. 147) Not only was no effort made to control for differences between dairies and beef ranches with respect to BMP effectiveness, and not only was there no effort to control for the change to organic operations, but these uncontrolled variables affected the same subset of watersheds (two watersheds with dairies and which experienced a shift to organic versus one watershed without dairies that did not experience that shift), further obscuring any inferences about true causality.

The same FOIA request to the NPS regarding this study requested “The records containing information about the confounders (changes in conditions over the study area and timeframe that was considered as possibly affecting the Voeller et al. 2021a paper’s findings) cited in Voeller et al. 2021a, specifically those records associated with the transition to organic certification for any dairy in the tested watersheds.” But this aspect of the FOIA request was unanswered.

And although switching to organic can be viewed as simply the implementation of yet further BMPs, these are not the BMPs credited with the water improvements in the study. (One of the main changes involved in going organic is a reduction in herd size, and presumably further reductions would result in further improvements.) Furthermore, going organic is something *that can only be done once*, implying that whatever improvements were attributable to the switch (which we don’t know, since that is not established in the study), there is no reason to believe additions improvements are achievable.

Additionally, and probably most significant, the only watershed that *did not have* a major uncontrolled variable (Home Ranch Creek watershed) had just two BMPs over the study period.

In summary, the study only scoped in three watersheds and 30 BMPs; the two watersheds with the biggest improvement had a significant uncontrolled variable over the study period; and the third one had only two BMPs, with uncertain start and completion dates.

Misrepresented results: The study claims, “Overall, for the analysis by station, FIB below the water contact recreation numeric objective increased sixfold, from 0.06 to 0.38 of all samples after 2006 while the values > 4,000 MPN/100 mL declined by > 75%, from 0.59 to 0.13 (see Table 3, Fig. S5).” (p 147)

Of course, all stations are in one watershed or another and so station level data rolls up to watershed level data. Table 3 from the report (which has no station level data) is given below:

Table 3
Best cumulative link mixed model estimates of proportion of samples in each class by time period and watershed adjusted for average rainfall over the study period. Values in bold have standard errors > 0.1.

	Abbotts		Kehoe		Home Ranch Creek		E. Schooner Creek	
Class (MPN/100 mL)	2000-2006	2007-2013	2000-2006	2007-2013	2000-2006	2007-2013	2000-2006	2007-2013
Below numeric objective	0.10	0.34	0.06	0.24	0.19	0.53	0.24	0.60
Numeric objective to 4 000	0.46	0.51	0.37	0.54	0.54	0.40	0.54	0.34
4 000–10 000	0.16	0.07	0.17	0.09	0.11	0.03	0.09	0.03
10 000–100 000	0.23	0.07	0.31	0.10	0.13	0.03	0.10	0.02
> 100 000	0.06	0.01	0.09	0.02	0.03	0.01	0.02	0.00

Note that the maximum ratio increase in Category 1 measures (below the recreational contact threshold) for any watershed in the table is 400% (.06 vs .24 for Kehoe). Although you can’t average averages, even if you do, you can’t get results outside the range of all the averages. In other words, the only way “the analysis by station” can give a six-fold increase in Category 1 measures is if it reports a selected slice of the data, for example, the one station with the most dramatic improvement. (It could

be something else, but what it actually means is not explained in the paper.) But doing so misrepresents the situation, seemingly willfully.

Furthermore, the authors admit that their category model can be misleading. Specifically, the results show that there was a two-and-a-half-fold increase in the number of measurements below the regulatory threshold in the sole watershed in the study with no BMPs enacted over the study period (namely East Schooner Creek, which was included in the study as a control watershed, even though it had no BMPs.) See highlighted values in the same table:

Table 3
Best cumulative link mixed model estimates of proportion of samples in each class by time period and watershed adjusted for average rainfall over the study period. Values in bold have standard errors > 0.1.

	Abbotts		Kehoe		Home Ranch Creek		E. Schooner Creek	
Class (MPN/100 mL)	2000-2006	2007-2013	2000-2006	2007-2013	2000-2006	2007-2013	2000-2006	2007-2013
Below numeric objective	0.10	0.34	0.06	0.24	0.19	0.53	0.24	0.60
Numeric objective to 4 000	0.46	0.51	0.37	0.54	0.54	0.40	0.54	0.34
4 000-10 000	0.16	0.07	0.17	0.09	0.11	0.03	0.09	0.03
10 000-100 000	0.23	0.07	0.31	0.10	0.13	0.03	0.10	0.02
> 100 000	0.06	0.01	0.09	0.02	0.03	0.01	0.02	0.00

The number of measurements also went down starkly in categories 3, 4, and 5 in East Schooner Creek (despite no BMPs.) Considering increases in Category 1 measures, the one watershed with no BMPs (East Schooner Creek, 250% increase) performed nearly the same as the one watershed that did not have an organic conversion over the study period (Home Ranch Creek, 279% increase.) This is curious, and could cast doubt on the overall conclusions, but the paper dismisses the anomaly as “likely due to artifacts from categorical versus continuous models.” (P. 147)

So, under the binned or category model approach, one or a subset of categories can go up or down independently of, or disproportionately to, the overall trend for the station, watershed, or the study overall. The shuffling between categories is not necessarily indicative of the overall change in average values or water quality. For example, if you compare student grades year over year for some year-class, the number of A’s can go up even if the overall class numerical average drops, the number of F’s can increase even if the overall class numerical average increases, or vice-versa.

But the categorical model did not apply only to East Schooner Creek and although the authors are willing to cite this aspect of that model type to explain away the apparently anomalous trend, they do not point out the obscuring effect of the categories on the watersheds they wish to stress. The categorical model misleads in the same way for all watersheds (a four-fold increase in Category 1 measures is nothing like a 400% improvement in water quality), and selectively citing it for only those watersheds including BMPs while explaining it away for the uncooperative watershed is misleading. In other words, the reader is asked to take seriously the (outlying and possibly cherry-picked) six-fold increase in Category 1 measures for some unspecified station, but invited to ignore the two-and-a-half-fold increase in the watershed which lacked BMPs.

Note the artificial and misleading measures-related categories are superimposed on the already dubious before / after category, further casting doubt on the conclusions.

Point Reyes National Seashore added news of this study to their website, “Best Management Practices Improve Water Quality on the Point Reyes Peninsula,”¹³ shortly after the study was published. That page includes the claim, “The scientists also found that water samples met regulatory criteria six times more often.” As discussed above, that claim, if true in any sense, is certainly not representative of the actual data scoped in the study. But here it is repeated without qualification.

The discussion section of the Voeller paper reads, “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.” (p 147) The same PRNS webpage borrows wording from here: “Bacteria concentrations *may* still *periodically* exceed regulatory objectives.” Leaving aside the inserted and indeterminate “may” (there is no doubt, they certainly will *frequently* exceed objectives) from that statement, “periodically” means “from time to time.” (Another meaning is *at regular intervals*, but this meaning cannot be operative here.) Actual exceedances in the after period are between 47% and 76% across watersheds. In summary, instead of glibly reporting regulatory compliant measures increased six-fold, the authors and the NPS could have more honestly relayed, “measures are still outside of regulatory compliance *most of the time* despite the presence of numerous BMPs.”

Note on precipitation: the Voeller paper adjusts bacteria measures for rainfall in its analysis, something the authors say is necessary for a meaningful trend evaluation. Voeller is also an author on the Lewis paper, which says for its study area and period, adjusting for precipitation is unnecessary. Responding to last spring’s citizen-sponsored water quality tests (“Point Reyes seashore water tests find high bacteria levels,” Marin IJ¹⁴), the Park Service minimized the findings, citing the effect of precipitation (“Seashore spokeswoman Melanie Gunn told the Light the test results were “in line with what we might expect after a rain event at this time of year.”¹⁵). However, *it does rain*, after all, more or less, on and off, and the dismissal of rain-influenced measures as anecdotal seems to ignore the fact that contaminants and run-off from ranches in the park eventually reach the ocean and may affect plant and animal life there.

Common BMPs such as creek exclusion fencing and pasture water troughs are designed to cause cattle to defecate more centrally in pastures instead of in or near streams. This would seem to change the outflow *profile* of bacteria to the ocean and not necessarily the overall amount, depending on soil type, topology, etc., or perhaps not to the same degree that controlling for (controlling away) post-storm measures may imply. In other words, if BMPs cause a re-profiling of bacteria outflow to downstream waterways, controlling for precipitation actually obscures the fact that all that has changed is when, not how much, bacteria enter the waterways. In fact, salmonid species whose potential habitat includes some streams in Point Reyes, such as steelhead trout and coho salmon, are actually spurred upstream by freshwater outflows, so concentrating outflows after rains may be in that sense more concerning.

Conclusion re: water quality: Both the Voeller and Lewis papers include disavowals of conflict of interest, but all three authors of the Voeller paper and second author on the Lewis paper (again, Point Reyes National Seashore Range Program Manager, Dylan Voeller) are NPS personnel whose employer issued the claim of non-impairment under severe political pressure from prominent politicians and ranching interests. It does not avoid the appearance of conflict of interest that the park service ceased

¹³ <https://www.nps.gov/articles/000/best-management-practices-improve-water-quality-on-the-point-reyes-peninsula.htm>. Last updated: April 30, 2021.

¹⁴ <https://www.marinij.com/2021/03/20/point-reyes-seashore-water-tests-find-high-bacteria-levels/>

¹⁵ <https://www.ptreyeslight.com/news/private-tests-show-bad-water-quality-near-park-ranches/>

water quality testing in the Pacific-draining watersheds in the year following then Interior Secretary Salazar's direction to the Park Service to pursue 20-year leases for the Point Reyes ranches. Neither does it avoid the appearance of bias that the authors decided to write a paper, using 8-year-old data, and publish just in time to be referenced by their employer's controversial Record of Decision. The paper was published after the public comment period on the draft General Management Plan Amendment but before the final decision and so was not available for public comment during that phase of the formal process. Add to this the apparently selective reporting of cherry-picked data described above and appearances of bias are magnified.

Mark A. Walsh
Writer, Editor, Analyst, Advocate
San Francisco, CA

415 425 9978
markwalsh@bluewavestrategic.com
<https://www.linkedin.com/in/markawalsh>

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

March 31, 2022
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 trammled 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

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
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.

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 24th 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

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

Jocelyn Knight
105 Sunnyside Ave.
Corte Madera, CA 94925

California Coastal Commission
455 Market St. Suite 223
San Francisco, CA 94105-2219
Via USPS and web portal
April 1, 2022

RECEIVED

APR 04 2022

CALIFORNIA
COASTAL COMMISSION

RE: 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.
Item Th18a

Dear Commissioners,

I have spent the last two years documenting with photographs countless trampled waterways, polluted water, eroding stream banks, a bulldozed creek, dump sites, toxic tire piles, masses of ranching junk, rusting barbed wire and broken pipes on every single ranch within the Pt. Reyes National Seashore. All of these issues have enormous consequences for the wildlife struggling to survive on these lands, as well as effectively keeping the public from enjoying 27,000 acres, almost a third of the land in the Park.

I write to you as a citizen scientist, a certified Naturalist, a life-long Marin County resident, photographer and Grandmother.

I was part of the volunteer effort to gather water samples for the Water Quality testing last winter for 9 weeks. Each week we got up well before dawn to drive to Pt. Reyes, don hip-waders and rubber gloves and hike to various monitoring sites to gather water samples in all kinds of weather. The results of that giant volunteer effort confirmed what we already knew, that the waters in Pt. Reyes are still filled with bacteria from cow feces and urine.

As a professional photographer I felt compelled to document the impacts of cattle ranching on the natural habitats of the National Seashore. I am submitting a small fraction of my photographs to illustrate that the destruction of our beloved Park is ongoing and will be irreparable if you allow the NPS to continue their negligence in protecting our natural resources in favor of private livestock ranching.

The NPS was supposed to have been monitoring, reporting and making sure that ranchers implemented "best management practices" since the Seashore was established over 60 years ago. They have consistently avoided and neglected to do this. What makes the CCC think that the NPS and these ranchers are suddenly going to change their practices and abide by the restrictions that are imposed on them from **any** agency? There apparently have been no consequences for their massive pollution and destruction of the natural environment since the ranches were established.

The heart of Pt. Reyes National Seashore, Drakes Estero, is part of the Phillip Burton Congressionally Designated Wilderness and is **completely surrounded by cattle operations** that drain into it and the Pacific Ocean.

Since I was a little girl I have been waiting for the Pt. Reyes National Seashore to look like a Park instead of a cattle ranch.

My fervent wish is for future generations to know what a Coastal Prairie looks like in their National Seashore. It will take several decades to restore the devastating damage that 150 years of cattle ranching has done to the landscape, but I still have hope.

I believe it is completely inconsistent with the intent of the Coastal Commission to allow the National Park Service to continue aiding and abetting this egregious degradation by a few private commercial cattle operations that continue to pollute our waters and ravage our Park.

I also believe it is wrong and perhaps illegal, to allow Commissioner Katie Rice to be involved in any vote regarding the PRNS. She is clearly in favor of ranching throughout Marin County and supports those in our National Seashore as they are some of the most powerful and wealthy landowners in the County. Rice should have recused herself at the meeting in April, 2021 due to her obvious conflict of interest.

I hope that my photographic documentation of the destruction of our National Seashore tells you more than my words ever could.

Please be the force for good and the savior of our natural environment in the only National Seashore on our Coast.

The Commission should not approve the NPS Water Quality Strategy and GMPA for PRNS and the GGNRA.

It is a travesty that the NPS has neglected to protect our waterways and wildlife in the National Seashore.

The best solution to all the pollution problems in the waters of the Seashore is to **immediately remove all cattle operations and the 300 miles of barbed wire fencing** that imperils wildlife and keeps the public from enjoying the Park that they paid for so long ago.

Thank you for your time and attention to this issue in our National Park.

Sincerely,


Jocelyn Knight
105 Sunnyside Ave.
Corte Madera, CA 94925
(415) 250-8165
jocelynknight.com

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

My name is Louise Gregg. My father was Harold Gregg, first Ex-Director of the Marin Conservation League. I was raised at Forest Farm, a school and then a summer camp dedicated to teaching through nature and art. The land included the south side of Mt. Barnaby which bordered Samuel P. Taylor Park, then public land, the Point Reyes National Sea Shore (PRNS).

I take what is happening at PRNS personally. I feel it is our responsibility to do everything we can to care for, support, and protect this natural resource, this wilderness, this beauty.

While volunteering at PRNS to protect the Snowy Plover, an endangered species and the winter wildlife, I became a witness of the cattle not being fenced off and wandering through sensitive areas, where cinnamon teal ducks were trying to raise their young. I got to wondering why doesn't the National Park have a riparian set back law, Marin County has one. Also, the park had a permit to cull "kill" ravens because their numbers were so high due to the cattle ranchers who had created an environment ideal for them to multiply. This became a problem because they are the number one predator of the endangered Plovers.

About the elk – it is unforgivable to fence in the elk and let them die due to neglect. The National Park mission statement 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."

***Matt Maguire
626 East D St.
Petaluma CA 94952***

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

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

March 30, 2022

Dear Commissioners:

Now that the National Park Service knows the Coastal Commission means business (and thank you, Commissioners, for not allowing Supt. Kenkel an unwarranted delay on the NPS' agreed-upon response) and has submitted its water and air pollution plans, there are several issues before you for your consideration:

* Is their Water Quality Strategy plan viable? Will it actually mitigate the pollution and negative impacts of excessive manure and runoff into PRNS waterways, lagoons and the Pacific Ocean? Can it demonstrate that such mitigation will reduce the levels of toxic waste, fecal bacteria and excess nutrients to safe levels? What is the monitoring and enforcement process to ensure this?

* Is their Climate Action Strategy plan viable? Will it mitigate the over six and a half times more greenhouse gas pollution caused by the privately owned cattle than that originating from the 2 million-plus visitors each year? Does it address increasing temperatures, ongoing drought, and ocean rise? Again, can it demonstrate that such mitigation will reduce the levels of methane and other GHG pollutants to safe levels? What is the monitoring and enforcement process to ensure this?

* Is the NPS capable of enforcing these measures? Can it be trusted to consistently uphold these programs over time?

* Can the San Francisco Bay Regional Water Quality Control Board be trusted as a partner in overseeing and enforcing provisions of the plan?

It appears as submitted the NPS' Water Quality Strategy and Climate Action Strategy could improve water and air pollution caused by the ranches – if enforced. However, NPS' track record of enforcement in the Seashore has been historically weak at best, and at worst represents a dereliction of duty.

For instance, NPS claims that according to the Regional Water Quality Control Board's General Waste Discharge Requirements, dairy operators are required to conduct regulatory monitoring downstream of their operations during three wet season storm events per year as part of their individual waste management plans. But when asked about testing and results, the RWQCB states "the National Park Service has the responsibility to hold its facility operators to standards that ensure compliance with water quality regulations and permits," that NPS is the enforcing agency. To date, NPS has told members of the public that the waste management plans for individual ranches are designed and monitored by the ranchers themselves. And when that information has been requested, the public is told that the plans are "proprietary" and therefore not available.

Likewise, NPS says in its water protection plan that recreational beach sampling for fecal indicator bacteria is conducted weekly per the Marin County Ocean and Bay Water Quality Testing Program. Yet just last year, Marin County Environmental Health Services was contacted by local concerned citizens who had tested and found dangerous levels of contaminated waters in Abbotts Lagoon, which had not been tested since 2013 by either the NPS or Marin Health. Marin Health responded by providing warning signs which were posted by one citizen. When they were promptly removed, presumably by NPS, Marin Health said the waters were NPS' jurisdiction, since they were in the Seashore. NPS was contacted regarding the dangers but refused to repost any signs or take any action to protect the public from exposure. No signs have been seen to date, despite the known dangers.

Such a cavalier stance by the NPS does not inspire confidence that they will be diligent in their oversight.

NPS' water plan does propose new water testing sites on Drake's Bay and along the coast at the northern end of the peninsula. However it lacks testing sights on the ocean side of the southern end of the Seashore (Figure 1), which invites continued pollution from the dairies located on that part of the coast. This lack needs to be addressed before the Commission confirms a Consistency Determination.

Upon close reading of the Environmental Impact Statement for the GMPA, it's clear that ranch operations cannot continue if clean waters and clean air are to be achieved in the park and the native flora and fauna are to be protected and given a chance to thrive. No climate action plan or strategy can alter this reality. Even methane digesters don't capture the belches and gas cows emit, so there will always be excessive environmental damage in PRNS as long as ranching continues.

In the past few years, there has been a growing awareness on the part of the public that the NPS has acted more as a handmaiden to the ranching interests than an agency tasked with protecting the public's precious resources. The ignoring of years-long water violations, the lack of testing, the discovery of massive trash dumps festering for years on certain ranches (right

under the nose of the NPS), the bulldozing of anadromous fish streambanks, the stonewalling of public efforts to address the destruction of deep-rooted native grasses, the shooting and starving of native tule elk, the lack of accountability when ranches were discovered violating the terms of their leases, all testify to the fact that the NPS is unlikely to be an effective steward of our Seashore, regardless of how good their plans look on paper.

Our world is being consumed by mega-fires, is suffering extreme drought and vanishing water supplies and the massive extinction of vast portions of our planet's plant and animal life. 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 only due to the Commission'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 private, profit-seeking ranchers. The Commission is in the position to uphold the Coastal Act by putting an end to the pollution and degradation caused by ranching operations, with all its attendant impacts, 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.

Thank you for your consideration.

Sincerely,
Matt Maguire

From: Kenneth Bouley
34 Drakes Summit Road
Inverness California 94937
(415) 259-1332
kennethbouley@gmail.com

To: California Coastal Commission

CC: U.S. Interior Secretary Deborah Haaland
Shannon A. Estenoz, Assistant Secretary for Fish and Wildlife and Parks
Cindy Orlando, Principal Deputy Regional Director - National Park Service
U.S. Representative Jared Huffman (CA-2nd district)
Point Reyes Superintendent Craig Kenkel

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

(Please note the attached PDF includes footnotes omitted from the below email.)

Thank you for receiving my comments regarding April 2022 Agenda Item Thursday 18a - CD-0006-20 (National Park Service, Marin County.) As a concerned, local citizen, I have closely read the various relevant publications and correspondence from the Park Service. I paid particular attention to one water quality study generated and leveraged by the Park Service in their process and obtained detailed raw data regarding that study via a request under the Freedom of Information Act (FOIA).

I don't believe the Park Service will be able to adequately improve water quality in the Seashore and I further think they are representing an overly optimistic view of their prospects for doing so. Specifically, the Park Service fails to acknowledge the known, steep decline in BMP effectiveness over time and instead cites their own, flawed study which exaggerates and misrepresents findings. The willingness to misrepresent is hard to miss and, in my opinion, casts doubt on the overall motives and objectivity of the materials. ***Details are in the postscript below.*** I specifically call the attention of **Commissioners Gold, O'Malley**, and any Commissioner interested in the details regarding Best Management Practices and the Park Service's analysis.

The Park Service does not have a strong record regarding enforcement of existing leases and permits in Point Reyes. Many of us are still waiting to hear if there will be any consequences whatsoever for the ranch leaseholder who was found to have illegally bulldozed a 900-foot path through native vegetation and into a creek supporting endangered species, in clear violation of his existing lease. (Marin IJ, "Point Reyes National Seashore: Ranch illegally bulldozed habitat."^[1]) This incident occurred in the Coastal Zone. Note it was the leaseholder himself who admitted to running the bulldozer and not, for example, a new employee who might not have known better. Note the incident was discovered by a member of the public, not by the Park Service. Note the very creek involved in the incident is referenced in the Park Service's water quality study as standing to improve via future BMP implementation.

Similarly, as far as I am aware, there has been no public notification of the consequences, clean-up, or related costs regarding the discovery (again by a private citizen, not by the Park Service) of a toxic dump on E Ranch in the Seashore. (“Old dump site prompts park investigation.”^[2]) I believe the dump site is in the Coastal Zone. In my opinion, the Park Service feigned surprise — “While it is common for ranch operations to have a small area of material storage, the nature and scale of this accumulated debris is concerning,” said Melanie Gunn, a spokeswoman for the park^[3] — but the site had been there for decades according to satellite imagery.

I note that recently there have been reports of issues with the septic systems at ranch buildings in the Seashore. It is my understanding that maintenance of septic systems is the responsibility of the leaseholders. Here is another example where we can learn whether or not the NPS is inclined to enforce the existing rules, such as they are. Ordinary citizens like me have not enjoyed transparency in the management of our park. Many of us are jaded to “no comment” type replies from NPS and are learning to use the FOIA, as arduous and slow as that process is.

If NPS will not punish egregious violations of policies already in place, it would be naïve to think they will start anytime soon.

I recommend the Commission to be aware that the National Park Service is under immense pressure to continue ranching in Point Reyes in the form of lobbying and influence from, among others, the Marin County Board of Supervisors (which has close ties with ranching interests in Point Reyes), Senator Diane Feinstein, and Rep. Jared Huffman (CA 2nd district, which includes Point Reyes National Seashore), who has acted out-of-character with his green reputation from the start in Point Reyes. Some of the committee members already received ex parte communications from Rep. Huffman and may well do so again. The Congressman has been supporting continued ranching in Point Reyes, including attempts to change the park charter (see his failed bill H.R. 6687^[4]) prior to the Environmental Impact Statement publication.

Under such pressure from powerful places, it is perhaps unsurprising that the Park Service has so far done next to nothing to improve the environment at Point Reyes which was not court-ordered or in some other way inescapable. Their recent attempt to stonewall the Coastal Commission by declining to meet previously agreed conditions is yet another example. I’m grateful that the Commission did not accept the obvious excuses and I urge the Commissioners to scrutinize what must be, under the circumstances, a hastily assembled attempt to check the bare minimum number of boxes.

I realize the Commission is not a political body and has a specific and constrained set of duties. However, this is also theoretically true of the National Park Service, which appears unwilling or unable to execute its duty regarding Point Reyes. I sincerely hope the Coastal Commission exerts its full influence strictly and conscientiously and does no rubber stamping. I urge the Commission to reopen and reverse the narrowly approved determination of consistency for the National Park Service’s General Management Plan Amendment regarding the future management of ranching in Point Reyes National Seashore.

Thank you.

Sincerely,

Kenneth Bouley
Inverness CA 49937

P.S. Below is a more **detailed analysis** of the Park Service's unsupported claims regarding expectations of future improvements in water quality in the Seashore. I would be happy to discuss any aspect of my review with any Commissioner.

In its March 4, 2022, letter to the California Coastal Commission,^[5] the Park Service wrote to the Commission, "Changes related to more robust requirements for ranch operations and additional restrictions on diversification activities will increase the certainty of water quality protections and reduce environmental impacts from dairy operations and forage production." [emphasis added]

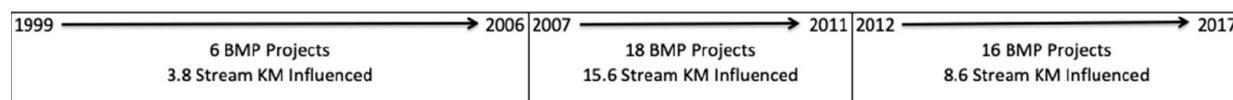
But *there is no such certainty*, and in fact the opposite is apparent. Recall that the Final Environmental Impact Statement (FIES) prepared for the General Management Plan Amendment^[6] (GMPA) specifies, "Under alternative F [removing ranching], impacts on water quality would be noticeable, long term, and beneficial because ranching activities would be phased out across the entire planning area." (GMPA, page vii), whereas "Alternative B [the selected plan] 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." (GMPA, page 135). This much is as per the Park Service.

Yet by the time the Record of Decision^[7] (ROD) was issued, the story had changed: "Implementation of the selected action and the measures discussed above will result in continued improvements in water quality in the planning area, consistent with trends that have been documented through long-term monitoring (Lewis et. al. 2019 ^[8] and Voeller et. al. 2021 ^[9])." (ROD, p D-9) [emphasis added]

Unacknowledged Diminishing Returns: The Park Service omits the fact that the cited papers explicitly characterize the impacts of the evaluated BMPs as exhibiting a steep decline of effectiveness over time. For example, the discussion in the Lewis paper states:

An interesting aspect of our findings is that, while the downward trend observed across grazed sites was significant across the entire period (Figure 4), there was a notable reduction in fecal coliform concentrations with the completion of the 1999-2006 BMP phase ... Comparing the 1999–2006 mean (1906) to the 2007–2017 mean (291), it appears that the initial prioritization and implementation of BMPs was associated with a mean reduction of fecal coliform by 1615 cfu/100ml—an 85% mean reduction that persisted throughout the remainder of the study period... (pp 7-8).

Here is Figure 2 from the Lewis paper:



So, 85% of the benefit was achieved in the first 42% of the effort measured by time, the first 15% of the effort measured by number of BMPs, and in the first 14% of the effort measured by length of fence influenced.

When the Park Service claims additional BMPs will cause a similar trend in water quality impacts, what trend do they mean? They presumably mean to imply water will continue to improve to a point where it meets standards (a speculation), rather than to imply that BMPs get progressively more expensive and less effective (the actual trend).

The Lewis paper states, "Fencing to limit or exclude cattle access to stream corridors has been shown to be highly effective in improving water quality and riparian habitat" (p. 7) and "All six BMPs implemented between 1999 and 2006 were stream corridor fencing (3.8 km), with five of the six projects directly eliminating cattle access to approximately 90% of the mainstem of Olema Creek." (p. 8) In the Voeller paper, more than half the BMPs (16/30) were fencing, and another 20% (6/30) involved water lines and/or troughs designed to keep the cattle out of creeks.

Although the Lewis paper discussion concludes their findings emphasize the need to prioritize BMP implementation, another clear conclusion is that fencing or coaxing cattle out of creeks (with artificial water sources) is by far the most cost-effective BMP, and then further improvements become increasingly more difficult to achieve.

In their comments to the draft GMPA/DEIS, the San Francisco Regional Water Board put it this way:

Technical or financial infeasibility of implementing appropriate BMPs, management or mitigation measures to eliminate or reduce impacts: In some Ranch Core locations, the suggested mitigation measures, such as "comply with requirements in the General CAF permit" may not be adequate. For example, the requirement to eliminate stormwater run-on into areas containing waste products, may be technically or financially infeasible. In the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS. ^[10] [emphasis added]

The Voeller paper has several other significant problems:

Inappropriate before/after approach: The paper implements a before and after comparison in its discussion (for example, "Overall, for the analysis by station, FIB below the water contact recreation numeric objective increased sixfold, from 0.06 to 0.38 of all samples after 2006..." (p 147). However, "before" and "after" were not determined relative to an effort to identify the expected effective dates of any of the Best Management Practices (BMPs), but rather were determined by the date at which the sampling switched from measuring fecal coliform (FC) to measuring Escherichia coli (EC), as part of a discipline-wide trend. ^[11] In other words, "before" and "after" are not defined as before and after anything that matters. A FOIA request asked for "The records containing information about why the water quality samples referenced in Voeller et al. (2021a) were split up and evaluated as years 2000-2006 and then 2007-2013," but this request was unaddressed in the FOIA response. ^[12] In fact, an arbitrary dividing line would have likely been better because it would not have introduced or amplified any inaccuracy or variability in the conversion of FC to EC as a potential source of error in

the results. In other words, if the method of converting the FC measures to EC includes any error, using that as the dividing line makes the most of the error and convolutes results.

Poorly defined and quantified explanatory variables: The explanatory variables in the Voeller paper (the putative causes of the measured improvements) are BMPs implemented over the study period (2000-2013). But there are only 30 BMPs in scope, across three watersheds, and they are arbitrarily defined and quantified. For example, 16 of the 30 BMPs involve fencing, but there is no effort to consider length or placement of the fence, number of animals excluded, etc. Neither do the authors know with any degree of certainty when the projects began and ended relative to the water quality measures which they allegedly improved. The same FOIA request asked for BMP project start dates and completion dates. The National Park Service's response included only estimated completion year for the projects. Responses for 12 of 30 (40%) BMPs say things like "Completed by 3/2010 based on imagery," meaning the project was done just some time before a certain year estimate. In other words, there is no knowledge of whether this BMP affected just the after results, or the before and after results. If it affected both, it is obviously not the cause of the measured improvements. For three of the 30 BMPs, the completion estimation dates are a three-year spread. The same FOIA request asked for "The expected timeframe for effectiveness of BMPs to be measurable," but this item was unaddressed in the FOIA response.

The arbitrariness of the before and after dividing line and the paucity of the BMP data point to a longitudinal study (with realistically represented trend lines) rather than a before/after study.

Paucity of data and omitted explanatory variables: As mentioned, there were only 30 (arbitrarily defined) BMPs implemented over the study period, with unknown effective dates. These BMPs were implemented in three watersheds. For two of the three, there was a significant uncontrolled variable as admitted by the authors:

"Changes in management not documented in this study could have also contributed to reductions in FIB concentrations. This included conversion of the dairies to organic operations (two in 2006 and one in 2011). General changes associated with this conversion included overall reduction of herd sizes and adherence to a number of regulatory requirements under the National Organic Program..." (p 147)

Conversion of some operations to the organic standard is an uncontrolled variable affecting two of the three watersheds with BMPs over the study period. Elsewhere in the results we learn that "at the watershed scale, the FIB reduction was more pronounced for those containing dairies (98%) when compared with the watershed with a single beef cattle operation (71%)." (P. 147) Not only was no effort made to control for differences between dairies and beef ranches with respect to BMP effectiveness, and not only was there no effort to control for the change to organic operations, but these uncontrolled variables affected the same subset of watersheds (two watersheds with dairies and which experienced a shift to organic versus one watershed without dairies that did not experience that shift), further obscuring any inferences about true causality.

The same FOIA request to the NPS regarding this study requested "The records containing information about the confounders (changes in conditions over the study area and timeframe that was considered as possibly affecting the Voeller et al. 2021a paper's findings) cited in Voeller et al.

2021a, specifically those records associated with the transition to organic certification for any dairy in the tested watersheds.” But this aspect of the FOIA request was unanswered.

And although switching to organic can be viewed as simply the implementation of yet further BMPs, these are not the BMPs credited with the water improvements in the study. (One of the main changes involved in going organic is a reduction in herd size, and presumably further reductions would result in further improvements.) Furthermore, going organic is something that can only be done once, implying that whatever improvements were attributable to the switch (which we don’t know, since that is not established in the study), there is no reason to believe additions improvements are achievable.

Additionally, and probably most significant, the only watershed that did not have a major uncontrolled variable (Home Ranch Creek watershed) had just two BMPs over the study period.

In summary, the study only scoped in three watersheds and 30 BMPs; the two watersheds with the biggest improvement had a significant uncontrolled variable over the study period; and the third one had only two BMPs, with uncertain start and completion dates.

Misrepresented results: The study claims, “Overall, for the analysis by station, FIB below the water contact recreation numeric objective increased sixfold, from 0.06 to 0.38 of all samples after 2006 while the values > 4,000 MPN/100 mL declined by > 75%, from 0.59 to 0.13 (see Table 3, Fig. S5).” (p 147)

Of course, all stations are in one watershed or another and so station level data rolls up to watershed level data. Table 3 from the report (which has no station level data) is given below:

Table 3
Best cumulative link mixed model estimates of proportion of samples in each class by time period and watershed adjusted for average rainfall over the study period. Values in bold have standard errors > 0.1.

	Abbotts		Kehoe		Home Ranch Creek		E. Schooner Creek	
Class (MPN/100 mL)	2000-2006	2007-2013	2000-2006	2007-2013	2000-2006	2007-2013	2000-2006	2007-2013
Below numeric objective	0.10	0.34	0.06	0.24	0.19	0.53	0.24	0.60
Numeric objective to 4 000	0.46	0.51	0.37	0.54	0.54	0.40	0.54	0.34
4 000–10 000	0.16	0.07	0.17	0.09	0.11	0.03	0.09	0.03
10 000–100 000	0.23	0.07	0.31	0.10	0.13	0.03	0.10	0.02
> 100 000	0.06	0.01	0.09	0.02	0.03	0.01	0.02	0.00

Note that the maximum ratio increase in Category 1 measures (below the recreational contact threshold) for any watershed in the table is 400% (.06 vs .24 for Kehoe). Although you can’t average averages, even if you do, you can’t get results outside the range of all the averages. In other words, the only way “the analysis by station” can give a six-fold increase in Category 1 measures is if it reports a selected slice of the data, for example, the one station with the most dramatic improvement. (It could be something else, but what it actually means is not explained in the paper.) But doing so misrepresents the situation, seemingly willfully.

Furthermore, the authors admit that their category model can be misleading. Specifically, the results show that there was a two-and-a-half-fold increase in the number of measurements below the regulatory threshold in the sole watershed in the study with no BMPs enacted over the study period (namely East Schooner Creek, which was included in the study as a control watershed, even though it had no BMPs.) See highlighted values in the same table:

Table 3

Best cumulative link mixed model estimates of proportion of samples in each class by time period and watershed adjusted for average rainfall over the study period. Values in bold have standard errors > 0.1.

	Abbotts		Kehoe		Home Ranch Creek		E. Schooner Creek	
Class (MPN/100 mL)	2000-2006	2007-2013	2000-2006	2007-2013	2000-2006	2007-2013	2000-2006	2007-2013
Below numeric objective	0.10	0.34	0.06	0.24	0.19	0.53	0.24	0.60
Numeric objective to 4 000	0.46	0.51	0.37	0.54	0.54	0.40	0.54	0.34
4 000-10 000	0.16	0.07	0.17	0.09	0.11	0.03	0.09	0.03
10 000-100 000	0.23	0.07	0.31	0.10	0.13	0.03	0.10	0.02
> 100 000	0.06	0.01	0.09	0.02	0.03	0.01	0.02	0.00

The number of measurements also went down starkly in categories 3, 4, and 5 in East Schooner Creek (despite no BMPs.) Considering increases in Category 1 measures, the one watershed with no BMPs (East Schooner Creek, 250% increase) performed *nearly the same* as the one watershed that did not have an organic conversion over the study period (Home Ranch Creek, 279% increase.) This is curious, and could cast doubt on the overall conclusions, but the paper dismisses the anomaly as “likely due to artifacts from categorical versus continuous models.” (P. 147)

So, under the binned or category model approach, one or a subset of categories can go up or down independently of, or disproportionately to, the overall trend for the station, watershed, or the study overall. The shuffling between categories is not necessarily indicative of the overall change in average values or water quality. For example, if you compare student grades year over year for some year-class, the number of A’s can go up even if the overall class numerical average drops, the number of F’s can increase even if the overall class numerical average increases, or vice-versa.

But the categorical model did not apply only to East Schooner Creek and although the authors are willing to cite this aspect of that model type to explain away the apparently anomalous trend, they do not point out the obscuring effect of the categories on the watersheds they wish to stress. The categorical model *misleads in the same way for all watersheds* (a four-fold increase in Category 1 measures is nothing like a 400% improvement in water quality), and selectively citing it for only those watersheds including BMPs while explaining it away for the uncooperative watershed is misleading. In other words, the reader is asked to take seriously the (outlying and possibly cherry-picked) six-fold increase in Category 1 measures for some unspecified station, but invited to ignore the two-and-a-half-fold increase in the watershed which lacked BMPs.

Note the artificial and misleading measures-related categories are superimposed on the already dubious before / after category, further casting doubt on the conclusions.

Point Reyes National Seashore added news of this study to their website, “Best Management Practices Improve Water Quality on the Point Reyes Peninsula,”^[13] shortly after the study was published. That page includes the claim, “The scientists also found that water samples met regulatory criteria six times more often.” As discussed above, that claim, if true in any sense, is certainly not representative of the actual data scoped in the study. But here it is repeated without qualification.

The discussion section of the Voeller paper reads, “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.” (p 147) The same PRNS webpage borrows wording from here: “Bacteria concentrations *may* still *periodically* exceed regulatory

objectives.” Leaving aside the inserted and indeterminate “may” (there is no doubt, they certainly will *frequently* exceed objectives) from that statement, “periodically” means “from time to time.” (Another meaning is *at regular intervals*, but this meaning cannot be operative here.) Actual exceedances in the after period are between 47% and 76% across watersheds. In summary, instead of glibly reporting regulatory compliant measures increased six-fold, the authors and the NPS could have more honestly relayed, “measures are still outside of regulatory compliance *most of the time* despite the presence of numerous BMPs.”

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Note on precipitation: the Voeller paper adjusts bacteria measures for rainfall in its analysis, something the authors say is necessary for a meaningful trend evaluation. Voeller is also an author on the Lewis paper, which says for its study area and period, adjusting for precipitation is unnecessary. Responding to last spring’s citizen-sponsored water quality tests (“Point Reyes seashore water tests find high bacteria levels,” Marin IJ^[14]), the Park Service minimized the findings, citing the effect of precipitation (“Seashore spokeswoman Melanie Gunn told the Light the test results were “in line with what we might expect after a rain event at this time of year.”^[15]). However, *it does rain*, after all, more or less, on and off, and the dismissal of rain-influenced measures as anecdotal seems to ignore the fact that contaminants and run-off from ranches in the park eventually reach the ocean and may affect plant and animal life there.

Common BMPs such as creek exclusion fencing and pasture water troughs are designed to cause cattle to defecate more centrally in pastures instead of in or near streams. This would seem to change the outflow *profile* of bacteria to the ocean and not necessarily the overall amount, depending on soil type, topology, etc., or perhaps not to the same degree that controlling for (controlling away) post-storm measures may imply. In other words, if BMPs cause a re-profiling of bacteria outflow to downstream waterways, controlling for precipitation actually obscures the fact that all that has changed is when, not how much, bacteria enter the waterways. In fact, salmonid species whose potential habitat includes some streams in Point Reyes, such as steelhead trout and coho salmon, are actually spurred upstream by freshwater outflows, so concentrating outflows after rains may be in that sense more concerning.

Conclusion re: water quality: Both the Voeller and Lewis papers include disavowals of conflict of interest, but all three authors of the Voeller paper and second author on the Lewis paper (again, Point Reyes National Seashore Range Program Manager, Dylan Voeller) are NPS personnel whose employer issued the claim of non-impairment under severe political pressure from prominent politicians and ranching interests. It does not avoid the appearance of conflict of interest that the park service ceased water quality testing in the Pacific-draining watersheds in the year following then Interior Secretary Salazar’s direction to the Park Service to pursue 20-year leases for the Point Reyes ranches. Neither does it avoid the appearance of bias that the authors decided to write a paper, using 8-year-old data, and publish *just in time* to be referenced by their employer’s controversial Record of Decision. The paper was published after the public comment period on the draft General Management Plan Amendment but before the final decision and so was not available for public comment during that phase of the formal process. Add to this the apparently selective reporting of cherry-picked data described above and appearances of bias are magnified.

[1] <https://www.marinij.com/2021/08/29/point-reyes-national-seashore-ranch-illegally-bulldozed-habitat/>

[2] <https://www.ptreyeslight.com/news/old-dump-site-prompts-park-investigation/>

[3] Ibid.

[4] <https://www.congress.gov/bill/115th-congress/house-bill/6687>

[5] CD-0006-20 – National Park Service, Point Reyes National Seashore - Update and Request for Extension of Time for Presentation of Water Quality Strategy for Commission Review. Superintendent Craig Kenkel to Executive Director John Ainsworth

[6] https://www.nps.gov/pore/getinvolved/planning_gmp_amendment.htm

[7] <https://www.nps.gov/pore/learn/news/newsreleases-20210913-gmp-amendment-rod.htm>

[8] <https://www.mdpi.com/2071-1050/11/19/5516>

[9] <https://bioone.org/journals/rangeland-ecology-and-management/volume-76/issue-1/j.rama.2021.02.011/Improved-Microbial-Water-Quality-Associated-with-Best-Management-Practices-on/10.1016/j.rama.2021.02.011.short>

[10] General Management Plan Amendment: Draft Environmental Impact Statement: Public Comments, comment #7018. https://www.nps.gov/pore/getinvolved/planning_gmp_amendment_deis_public_comments.htm

[11] “However, *Escherichia coli* (EC) is a better measure of coliform bacteria risks to human health than total or fecal coliform (FC) (Edberg et al. 2000), and as demonstrated by Deroose et al. (2020), regulatory numeric targets for FC can overestimate fecal contamination as compared with EC. Consequently, many microbial water quality monitoring programs have shifted their FIB measurements from FC to EC over the past few decades (Cude 2005; Garcia-Armisen et al. 2007; Rasmussen and Ziegler 2003).” P 140.

[12] FOIA DOI-NPS-2021-00S31S. Center for Biological Diversity to: National Park Service.

[13] <https://www.nps.gov/articles/000/best-management-practices-improve-water-quality-on-the-point-reyes-peninsula.htm>. Last updated: April 30, 2021.

[14] <https://www.marinij.com/2021/03/20/point-reyes-seashore-water-tests-find-high-bacteria-levels/>

[15] <https://www.ptreyeslight.com/news/private-tests-show-bad-water-quality-near-park-ranches/>

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

From: [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

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

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

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: [Jason Hull](#)
To: [Coastal Point Reyes Management Plan](#)
Subject: Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-
Date: Thursday, March 31, 2022 2:22:09 PM

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.

Cows produce 150 billion gallons of methane per day.

Please protect the native tule elk from being culled in our National Seashore.

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,
Jason Hull
jhull@miyokos.com

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

From: [Zorina Kibrick](#)
To: 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

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: [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

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

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

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

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

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

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

From: [Franziska Gerhardt](#)
To: Energy@Coastal
Subject: Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-
Date: Thursday, March 31, 2022 12:56:07 PM

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.

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' 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 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,
Franziska Gerhardt
Franziska.Gerhardt@gmx.de

From: [Debi Griepsma](#)
To: Energy@Coastal
Subject: Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-
Date: Thursday, March 31, 2022 12:48:07 PM

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.

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 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 Commission to do the right thing. Please protect our National Seashore, and revoke your conditional concurrence.

Sincerely,
Debi Griepsma
debiane3@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

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

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

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

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

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

From: [CARL FALCONE](#)
To: [Coastal Point Reyes Management Plan](#)
Subject: Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-
Date: Thursday, March 31, 2022 12:23:17 PM

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?

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 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,
CARL FALCONE
CFALCONE@MIYOKOS.COM

From: [CARL FALCONE](#)
To: [Coastal Point Reyes Management Plan](#)
Subject: Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-
Date: Thursday, March 31, 2022 12:23:12 PM

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.

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?

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.

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,
CARL FALCONE
CFALCONE@MIYOKOS.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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Public Comment on PRNS Water Quality for April 7 CCC Meeting
Date: Thursday, March 31, 2022 3:08:47 PM

From: Laura Phillips <spikey@pixar.com>
Sent: Wednesday, March 30, 2022 8:34 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Public Comment on PRNS Water Quality for April 7 CCC Meeting

Dear California Coastal Commission Members,

You are by now well aware of the dangerously high pollution levels that were found in Kehoe Lagoon, Abbotts Lagoon and South Kehoe Creek, as verified by independent laboratory water quality tests. How sad and ironic that this is happening in our National Seashore- now once of the most polluted places in California. How is this possible in a national park, especially when the Point Reyes National Park Service declares it's mission statement to be the following:

The National Park Service and Its Mission

"Point Reyes National Seashore was authorized in 1962 and established in 1972 to preserve and protect wilderness, natural ecosystems, and cultural resources along the diminishing undeveloped coastline of the United States. Located just an hour's drive from a densely populated metropolitan area, the Seashore is a sanctuary for countless plant and animal species and a haven for human inspiration, education, and recreation."

The actions of the NPS these past many years has been the antithesis of their own mission statement above. The ranches are clearly and verifiably destroying the natural ecosystems and polluting the national seashore's waters. Rather than protecting the wilderness and wildlife, as their mission statement claims, half of the trapped and captive Tule Elk herd have perished within a short year of dehydration and starvation under NPS management. The NPS "management" of the national seashore, it's wildlife and wilderness, has continually proven to be horrific and derelict in every aspect.

You are the stewards of our spectacular California Coastline and coastal waters. The future of Point Reyes National Seashore is in your hands, since the NPS has continually demonstrated it's dereliction of duty to protect and preserve PRNS wilderness and wildlife. Under NPS management, the public has continued to be deprived of coastal access, deprived of unmarred coastal views, the coastal waters have continued to be polluted with e-coli, which will continue to close the beaches and threaten the health of the public and numerous endangered species. Native wildlife and plants will continue to be destroyed and disappear. I am asking you to do the right thing, protect this precious and unique place, protect its native wildlife and plant life, protect the quiet and the breathtaking views and please protect the magnificent Tule Elk. These are all

treasures, for all to enjoy and appreciate. The passing of "Plan B" as the ROD was a tragedy for both the public, wildlife, and history. PRNS should be focused on PRESERVING and PROTECTING it's wilderness, not protecting ranches and killing rare Tule Elk! Ranches have NO PLACE in a national park, and you have the authority to do what's right for the wilderness, the wildlife and the future. It's all in your hands- please proceed bravely and boldly and rescind the Consistency Determination CD-0006-20.

Thank you for your consideration.

Sincerely,

Laura Phillips

Art Director and Green team member , Pixar Animation Studios

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; 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

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: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: water testing on PRNS
Date: Thursday, March 31, 2022 3:09:08 PM

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

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: [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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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 (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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

From: [Danielle Berg](#)
To: [Coastal Point Reyes Management Plan](#)
Subject: Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-
Date: Thursday, March 31, 2022 2:41:10 PM

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 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.

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

Kindly act in the best interest of the public good.

Sincerely,
Danielle Berg
daniberg19@gmail.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

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

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

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

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

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

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

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

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

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 (CO₂) 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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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 CO₂ 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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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: [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

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

From: ramblin@cox.net
To: Energy@Coastal
Cc: ramblin@cox.net
Subject: April 7: Agenda Item 18a CD-0006-20-Point Reyes National Seashore Water Quality.
Date: Friday, April 1, 2022 4:05:22 PM

NPS/PRNS officials were to be held accountable to establish, test, and enforce healthy water quality standards throughout the Seashore—especially on the suspect private, for-profit cattle ranch lease holdings.

PRNS management recently requested a delay—after nearly one year—to submit this comprehensive written water quality management plan for the Seashore. 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. But on March 24, 2022, PRNS did ultimately submit, as committed to the CCC board, at least a *one-year* plan addressing the Seashore's water quality management. In the April 2021 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. After hours of testimony in the April 2021 hearing, this bare 5-4 CCC approval of the PRNS GMPA pivoted on a stated commitment by PRNS's current Superintendent Craig Kenkel to within one year provide the CCC written, comprehensive, science-based water quality testing and enforcement protocols in a climate context.

This has become a horrific farce of negligence by superintendent Craig Kendel and his associates. Private Cattle Ranches Have NO PLACE IN/ON PUBLIC NATIONAL PARKS. These private ranches have polluted the grounds, the water and the wildlife, especially The Tule Elk which thrive only at PRNS.

Please do not let this desecration continue. Do not extend leases to these ranches. Let us purify the one, the only, Point Reyes National Seashore and Environs.

Please acknowledge receipt of my email, append this email to the record and respond with minutes of your findings post April 7th 2022 meeting .

Thank You for your consideration

Kindest Regards,...
Charlene Kerchevall
760-967-7673 telephone
ramblin@cox.net email

From: [dorette.english](#)
To: Energy@Coastal
Subject: Fw: Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-20 (National Park Service, Marin Co.)
Date: Monday, April 4, 2022 10:51:59 AM

I had incorrect subject on comment submitted Friday, April 1

----- Forwarded Message -----

From: dorette.english <dqe1@att.net>
To: EORFC@coastal.ca.gov <eorfc@coastal.ca.gov>
Cc: pointreyesmanagementplan@coastal.ca.gov <pointreyesmanagementplan@coastal.ca.gov>
Sent: Friday, April 1, 2022

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: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Pt Reyes National Seashore Leases
Date: Sunday, April 3, 2022 10:56:21 AM

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

From: Kathy Gervais <kagvet@yahoo.com>
Sent: Sunday, April 3, 2022 10:54 AM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Pt Reyes National Seashore Leases

The pollution from the farms in Point Reyes National Seashore must be lessen. My wish is that leases of the farms be retired and that the farms revert back to natural ecology which would benefit the elk and other wildlife in the park. It would also be an opportunity for coastal plains to be restored in the area.

The fence for the trapped elks can be taken down and they would be free to roam the park and not suffer when water/food is scarce on the Point.

Please rescind your approval of the NPS plans to maintain the leases.

Thank you,

Kathy Gervais DVM

Novato, California

Sent from my iPhone

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Pt. Reyes Water Quality item 18aCD-0006-20
Date: Friday, April 1, 2022 4:34:48 PM

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
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Public Comment on PRNS Consistency Determination agenda item for April 7, 2022 CCC Meeting
Date: Friday, April 1, 2022 5:08:36 PM

From: Sarah Butler <sarahgbutler@hotmail.com>
Sent: Friday, April 1, 2022 5:02 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Public Comment on PRNS Consistency Determination agenda item for April 7, 2022 CCC Meeting

Dear Coastal Commissioners,

I am a property owner in west Marin, and am writing to request that the Coastal Commission revoke the Conditional Concurrence it issued regarding the PRNS Management Plan in April 2021.

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.[2] 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. To further delay action on these urgent concerns would make a mockery of these outstanding issues taking place within 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, Sincerely,

Sarah Butler

233 Overhill Rd.

Orinda, CA 94563

also Via De La Vista,

Inverness, CA

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; 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

From: Elizabeth Kay Fife <fife@usc.edu>
Sent: Friday, April 1, 2022 4:54 PM
To: NorthCoast@Coastal <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

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Public Comment on PRNS Water Quality for April 7, 2022
Date: Friday, April 1, 2022 4:42:54 PM

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> 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
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Public Comment on PRNS Water Quality for April 7, 2022
Date: Friday, April 1, 2022 4:38:07 PM

From: Maximilienne Ewalt <maxewalt@gmail.com>
Sent: Friday, April 1, 2022 4:36 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Public Comment on PRNS Water Quality for April 7, 2022

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
To: Krygsman_Vail@Coastal; 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

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

From: Bear McGuinness <bear.mcguinness@gmail.com>
Sent: Friday, April 1, 2022 4:17 PM
To: NorthCoast@Coastal <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
To: Krygsman_Vail@Coastal; 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

From: Elizabeth Kay Fife <fife@usc.edu>
Sent: Friday, April 1, 2022 4:54 PM
To: NorthCoast@Coastal <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

From: [Robinson, Aurora@Coastal](mailto:Robinson.Aurora@CoastalEnergy@Coastal)
To: Energy@Coastal
Subject: FW: Subject Line: Public Comment on PRNS Water Quality for April 7, 2022 CCC
Date: Friday, April 1, 2022 3:09:23 PM

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

From: Stephanie Charles <smcharles@consultant.com>
Sent: Friday, April 01, 2022 2:49 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Subject Line: Public Comment on PRNS Water Quality for April 7, 2022 CCC

Hello members of CCC.

I am writing to support the testing of waters in and around Pt Reyes area to determine the levels of contamination and water quality.

This is a vital process adhering to standards that must be met for human, animal and ocean health in our National parks.

Please enforce and hold the NPS/ PRNS responsible for adhering to water testing and quality throughout the seashore.

Thank you

Stephanie and Martin Charles

Sent from my iPhone

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Subject Line: Public Comment on PRNS Water Quality for April 7, 2022 CCC
Date: Sunday, April 3, 2022 10:26:10 AM

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

From: Stephanie Charles <smcharles@consultant.com>
Sent: Friday, April 1, 2022 2:49 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Subject Line: Public Comment on PRNS Water Quality for April 7, 2022 CCC

Hello members of CCC.

I am writing to support the testing of waters in and around Pt Reyes area to determine the levels of contamination and water quality.

This is a vital process adhering to standards that must be met for human, animal and ocean health in our National parks.

Please enforce and hold the NPS/ PRNS responsible for adhering to water testing and quality throughout the seashore.

Thank you

Stephanie and Martin Charles

Sent from my iPhone

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: THE NPS must be held accountable for protecting PRNS in our state
Date: Sunday, April 3, 2022 6:53:54 PM

From: Sheryl Owyang <sherylrowyang@yahoo.com>
Sent: Sunday, April 3, 2022 3:24 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Cc: Sheryl Owyang <sherylrowyang@yahoo.com>
Subject: THE NPS must be held accountable for protecting PRNS in our state

I am a Bay Area native and am writing to comment on the lack of water quality testing and enforcement of the extensive private ranch lease holdings in Point Reyes National Seashore by the NPS.

The CCC narrowly approved the PRNS GMPA in April 2021 and gave the NPS an entire year to provide CCC written, comprehensive, science-based water quality testing and enforcement protocols in a climate context.

I understand that PRNS management recently requested a delay—after nearly one year—to submit this comprehensive written water quality management plan for the Seashore. 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. But on March 24, 2022, PRNS did ultimately submit, as committed to the CCC board, at least a *one-year* plan addressing the Seashore's water quality management.

Please do your job and hold the NPS accountable! Do NOT let the NPS renew the cattle ranch leases on PRNS. Please require that the NPS phase out these private ranches that environmental groups have shown are damaging to California's coast and wildlife.

Thank you.

Sheryl Owyang
San Francisco, CA 94118

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: the ranches in Point Reyes
Date: Saturday, April 2, 2022 10:42:37 AM

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

From: GMail Account <dferry108@gmail.com>
Sent: Saturday, April 2, 2022 7:12 AM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: the ranches in Point Reyes

The ranches were supposed to leave in the 1980's after being bought out.
The ranches are poisoning the park with the thousands of cows and cattle.
The idea of killing elk and allowing all the other plants and wildlife to be injured and killed to benefit the ranchers is an obscene tragedy.

From: [Jennifer Valentine](#)
To: melanie_gunn@nps.gov; [Coastal Point Reyes Management Plan](#); ccutrano@rri.org
Subject: please protect the Tule Elk behind the fence at Tomales Point.
Date: Tuesday, April 12, 2022 1:51:25 PM

The NPS has announced it is updating the plan for the Tomales Point Area at the northern end of the Seashore. This includes the elk that have suffered numerous droughts, trapped behind an 8 foot fence to prevent them from competing for forage or water with the neighboring ranches that lease land in the national park.

There have been cattle in creeks, confrontations with livestock or ranchers, illegal dumpsites, unsanitary conditions, broken fences, locked gates, injured, sick and dying of thirst wildlife.

the tule elk need to be protected - set them free or at least take care of the survivors

thank you

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

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.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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

From: [Bruce Campbell](#)
To: Energy@Coastal
Subject: re: Agenda Item Thursday 18a (April 7th) re: Point Reyes grazing management plan
Date: Friday, April 1, 2022 4:58:28 PM

Greetings Coastal Commission members,

These are my comments on the forthcoming Agenda item for April 7th known as Thursday 18a in regards to the Point Reyes National Seashore grazing situation. First, thanks so much for putting your foot down this time by not letting the scofflaw National Park Service weasel out of even giving an update on any progress in water quality and climate action strategies relating to the General Plan Amendment process!

It is quite obvious – unless one loves polluted waters and wants to see Tule Elk numbers continue to plunge in the area, that the cattle grazing situation at Point Reyes has not worked out well. I note that Interior Secretary Salazar back in November 2012 was focused on establishing wilderness in some of the marine environs of the area, but he did direct the NPS to extend grazing leases “from 10 to 20 years to provide greater certainty and clarity for the ranches operating within the national park’s Pastoral Zone and to support the continued presence of sustainable ranching and dairy operations.”

If one does the basic math, “10 years” from Salazar’s statement in November 2012 is November 2022. Also with the clear damage within the national seashore done by the cattle, it should not be able to claimed to be a “sustainable ranching” operation when it causes so much havoc for other species. TEN years was too much – we must learn from such mistakes and make sure they do not re-occur after the “ten-year window” closes. Yep, these unsustainable grazing practices

I was saddened to note that a slight majority of CCC members were hoodwinked by gullible staff and voted 5-4 to keep a third of this prized national seashore in private grazing hands on the premise that some serious issues regarding wildlife, climate, and water quality issues. Perhaps the NPS is rushing to get some plan together currently, but it appears that they did not want to even update the CCC on these serious environmental issues crying for attention at Pt. Reyes. (Hopefully the CCC staff is usually better, but I remember they sure got hoodwinked by Southern California Edison to get their spent fuel rod assembly waste in thin overstuffed canisters not far from the high tide line at San Onofre.)

Oddly enough, in the southern Sierra Nevada, the National Park Service is known as a considerably better forest manager than the U.S. Forest Service. So it is disturbing indeed that the NPS at Point Reyes appear to not care about environmental quality or public access and recreation. I hope that it is leftover from the Salazar call in 2012 which bureaucrats figured means they have to pander to the local grazing industry for ten to twenty years.

It is sad that the NPS also chose to mislead the CCC by acting like they can't come up with plans to improve water quality and impact on wildlife due to a lawsuit.

Enough is enough! The NPS has been under the influence of the Salazar directive. However the grazing was to be conditional – and the NPS shows no serious interest in addressing the serious contamination and overgrazing problems in the area which seriously impact marine species, Tule Elk, and others.

Act for the coast, wildlife, and recreation access. KINDLY MANDATE THAT NO CATTLE GRAZING MAY OCCUR AT POINT REYES NATIONAL SEASHORE AFTER NOVEMBER 30th, 2022 ! There is insufficient evidence to justify the “Federal Consistency Determination”, so please withdraw any approval of continued (damaging) grazing at Pt. Reyes at least AFTER NOVEMBER 30th, 2022.

Thank you so much for your consideration and best wishes for what appears to me to be a quite easy decision (given your mandate),

Bruce Campbell
10008 National Bl. # 163
Los Angeles, CA 90034

From: [Matt Maguire](#)
To: [Coastal Point Reyes Management Plan](#)
Cc: [Point Reyes National Seashore Restoration](#)
Subject: Re: Comment on Hearing Item #TH18a, National Park Service Consistency Determination No. CD-0006-20
Date: Friday, April 8, 2022 12:27:33 PM

Dear Commission Staff:

I submitted the comment letter below on March 30th, in both email and attached .pdf form, but it does not appear in the record of correspondence for the above hearing. Please add it to the record now. Also, I would appreciate it if you could confirm it's inclusion in a reply email.

Thank you,
Matt Maguire

From: Matt Maguire
Sent: Wednesday, March 30, 2022 6:38 PM
To: pointreyesmanagementplan@coastal.ca.gov
Subject: Comment on Hearing Item #TH18a, National Park Service Consistency Determination No. CD-0006-20

Dear Commission Staff:

Please find attached my comments for the Commission's upcoming hearing on the National Park Service's Consistency Determination No. CD-0006-20. I would appreciate your distributing them to all commissioners and submit them for the record. The full text is also included below my signature.

Thank you,
Matt Maguire

***Matt Maguire
626 East D St.
Petaluma CA 94952***

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

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

March 30, 2022

Dear Commissioners:

Now that the National Park Service knows the Coastal Commission means business (and thank you, Commissioners, for not allowing Supt. Kenkel an unwarranted delay on the NPS' agreed-upon response) and has submitted its water and air pollution plans, there are several issues before you for your consideration:

* Is their Water Quality Strategy plan viable? Will it actually mitigate the pollution and negative impacts of excessive manure and runoff into PRNS waterways, lagoons and the Pacific Ocean? Can it demonstrate that such mitigation will reduce the levels of toxic waste, fecal bacteria and excess nutrients to safe levels? What is the monitoring and enforcement process to ensure this?

* Is their Climate Action Strategy plan viable? Will it mitigate the over six and a half times more greenhouse gas pollution caused by the privately owned cattle than that originating from the 2 million-plus visitors each year? Does it address increasing temperatures, ongoing drought, and ocean rise? Again, can it demonstrate that such mitigation will reduce the levels of methane and other GHG pollutants to safe levels? What is the monitoring and enforcement process to ensure this?

* Is the NPS capable of enforcing these measures? Can it be trusted to consistently uphold these programs over time?

* Can the San Francisco Bay Regional Water Quality Control Board be trusted as a partner in overseeing and enforcing provisions of the plan?

It appears as submitted the NPS' Water Quality Strategy and Climate Action Strategy could improve water and air pollution caused by the ranches – if enforced. However, NPS' track record of enforcement in the Seashore has been historically weak at best, and at worst represents a dereliction of duty.

For instance, NPS claims that according to the Regional Water Quality Control Board's General Waste Discharge Requirements, dairy operators are required to conduct regulatory monitoring downstream of their operations during three wet season storm events per year as part of their individual waste management plans. But when asked about testing and results, the RWQCB states "the National Park Service has the responsibility to hold its facility operators to standards that ensure compliance with water quality regulations and permits," that NPS is the enforcing agency. To date, NPS has told members of the public that the waste management plans for individual ranches are designed and monitored by the ranchers themselves. And when that information has been requested, the public is told that the plans are "proprietary" and therefore not available.

Likewise, NPS says in its water protection plan that recreational beach sampling for fecal indicator bacteria is conducted weekly per the Marin County Ocean and Bay Water Quality Testing Program. Yet just last year, Marin County Environmental Health Services was contacted by local concerned citizens who had tested and found dangerous levels of contaminated waters in Abbotts Lagoon, which had not been tested since 2013 by either the NPS or Marin Health. Marin Health responded by providing warning signs which were posted

by one citizen. When they were promptly removed, presumably by NPS, Marin Health said the waters were NPS' jurisdiction, since they were in the Seashore. NPS was contacted regarding the dangers but refused to repost any signs or take any action to protect the public from exposure. No signs have been seen to date, despite the known dangers.

Such a cavalier stance by the NPS does not inspire confidence that they will be diligent in their oversight.

NPS' water plan does propose new water testing sites on Drake's Bay and along the coast at the northern end of the peninsula. However it lacks testing sights on the ocean side of the southern end of the Seashore (Figure 1), which invites continued pollution from the dairies located on that part of the coast. This lack needs to be addressed before the Commission confirms a Consistency Determination.

Upon close reading of the Environmental Impact Statement for the GMPA, it's clear that ranch operations cannot continue if clean waters and clean air are to be achieved in the park and the native flora and fauna are to be protected and given a chance to thrive. No climate action plan or strategy can alter this reality. Even methane digesters don't capture the belches and gas cows emit, so there will always be excessive environmental damage in PRNS as long as ranching continues.

In the past few years, there has been a growing awareness on the part of the public that the NPS has acted more as a handmaiden to the ranching interests than an agency tasked with protecting the public's precious resources. The ignoring of years-long water violations, the lack of testing, the discovery of massive trash dumps festering for years on certain ranches (right under the nose of the NPS), the bulldozing of anadromous fish streambanks, the stonewalling of public efforts to address the destruction of deep-rooted native grasses, the shooting and starving of native tule elk, the lack of accountability when ranches were discovered violating the terms of their leases, all testify to the fact that the NPS is unlikely to be an effective steward of our Seashore, regardless of how good their plans look on paper.

Our world is being consumed by mega-fires, is suffering extreme drought and vanishing water supplies and the massive extinction of vast portions of our planet's plant and animal life. 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 only due to the Commission'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 private, profit-seeking ranchers. The Commission is in the position to uphold the Coastal Act by putting an end to the

pollution and degradation caused by ranching operations, with all its attendant impacts, 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.

Thank you for your consideration.

Sincerely,
Matt Maguire

From: [Teufel, Cassidy@Coastal](mailto:Teufel.Cassidy@Coastal)
To: james.coda@comcast.net; [Ainsworth, John@Coastal](mailto:Ainsworth.John@Coastal); [Huckelbridge, Kate@Coastal](mailto:Huckelbridge.Kate@Coastal); [Coastal Point Reyes Management Plan](mailto:Coastal.Point.Reyes.Management.Plan@coastal.ca.gov); donnebrownsen@coastal.ca.gov; [Bochco, Dayna@Coastal](mailto:Bochco.Dayna@Coastal); [Hart, Caryl@Coastal](mailto:Hart.Caryl@Coastal); [Turnbull-Sanders, Effie@Coastal](mailto:Turnbull-Sanders.Effie@Coastal); [Aminzadeh, Sara@Coastal](mailto:Aminzadeh.Sara@Coastal); steve.padilla@coastal.ca.gov; [Wilson, Mike@Coastal](mailto:Wilson.Mike@Coastal); [Rice, Katie@Coastal](mailto:Rice.Katie@Coastal); [Escalante, Linda@Coastal](mailto:Escalante.Linda@Coastal); [Harmon, Meagan@Coastal](mailto:Harmon.Meagan@Coastal); [Uranga, Roberto@Coastal](mailto:Uranga.Roberto@Coastal); [Groom, Carole@Coastal](mailto:Groom.Carole@Coastal)
Cc: "Kenkel, Craig A"
Subject: RE: Second Request for Recusal of Commissioner Rice
Date: Friday, April 1, 2022 2:42:32 PM

Mr. Coda –

Thank you for your letter, which we have reviewed. On your concern about conflicts of interest, please see Coastal Act Section 30318, which addresses the issue of local government officials who are Commission members being allowed to vote on matters in both capacities.

Regards,
Cassidy

*Cassidy Teufel
Manager
Energy, Ocean Resources
and Federal Consistency
California Coastal Commission
455 Market Street, Suite 228
San Francisco, CA 94105-2219
(805) 585-1825
<http://www.coastal.ca.gov/>*

From: james.coda@comcast.net <james.coda@comcast.net>
Sent: Thursday, March 31, 2022 10:34 AM
To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>; Teufel, Cassidy@Coastal <Cassidy.Teufel@coastal.ca.gov>; Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>; donnebrownsen@coastal.ca.gov; Bochco, Dayna@Coastal <dayna.bochco@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Turnbull-Sanders, Effie@Coastal <effie.turnbull-sanders@coastal.ca.gov>; Aminzadeh, Sara@Coastal <sara.aminzadeh@coastal.ca.gov>; steve.padilla@coastal.ca.gov; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>; Groom, Carole@Coastal <carole.groom@coastal.ca.gov>
Cc: 'Kenkel, Craig A' <Craig_Kenkel@nps.gov>
Subject: Second Request for Recusal of Commissioner Rice

California Coastal Commission,

Attached is my second request for the recusal of Commissioner Rice. My reason, very briefly, is that Commissioner Rice is also a member of the Marin County Board of Supervisors and the Marin County Board's position (which Ms. Rice

voted in favor of) is that it supports NPS's preferred alternative which has been incorporated into its Coastal Consistency Determination and, later, its Record of Decision. Because of her position as a member of the Marin Board, she was in April of 2021, and is now, committed to supporting the Marin Board's and NPS's position. Therefore, she has a conflict of interest.

Commission members are required by the Coastal Act to approach each matter with an open mind and to review the facts, apply the Coastal Act and reach an objective decision. As a member of the Marin County Board of Supervisors, she cannot do that, as I explain in the attached letter. I believe she has also failed to comply with the ex parte communication provision of the Coastal Act, as explained in my letter.

Sincerely,

James Coda

THE CCC STAFF HAS BEEN PROVIDED A COPY OF THIS EMAIL AND THE ATTACHED LETTER.

From: james.coda@comcast.net
To: [Teufel, Cassidy@Coastal](mailto:Teufel.Cassidy@Coastal); [Ainsworth, John@Coastal](mailto:Ainsworth.John@Coastal); [Huckelbridge, Kate@Coastal](mailto:Huckelbridge.Kate@Coastal); [Coastal Point Reyes Management Plan; donnebrownsey@coastal.ca.gov](mailto:Coastal.Point.Reyes.Management.Plan@coastal.ca.gov); [Bochco, Dayna@Coastal](mailto:Bochco.Dayna@Coastal); [Hart, Caryl@Coastal](mailto:Hart.Caryl@Coastal); [Turnbull-Sanders, Effie@Coastal](mailto:Turnbull-Sanders.Effie@Coastal); [Aminzadeh, Sara@Coastal](mailto:Aminzadeh.Sara@Coastal); steve.padilla@coastal.ca.gov; [Wilson, Mike@Coastal](mailto:Wilson.Mike@Coastal); [Rice, Katie@Coastal](mailto:Rice.Katie@Coastal); [Escalante, Linda@Coastal](mailto:Escalante.Linda@Coastal); [Harmon, Meagan@Coastal](mailto:Harmon.Meagan@Coastal); [Uranga, Roberto@Coastal](mailto:Uranga.Roberto@Coastal); [Groom, Carole@Coastal](mailto:Groom.Carole@Coastal)
Cc: ["Kenkel, Craig A"](mailto:Kenkel.Craig.A)
Subject: RE: Second Request for Recusal of Commissioner Rice
Date: Friday, April 1, 2022 6:56:42 PM

Hi Cassidy,

Yes, I've already had this discussion with Louise Warren. I think it's important to point out that § 30318 doesn't say the excepted class of people listed in it, such as county supervisors, don't by definition have a conflict of interest, it says they can vote regardless of any conflict. There is certainly tension between it and § 30320 which talks about commission decisions being "quasi-judicial;" how fundamental fairness requires the commission to conduct its affairs in an objective and impartial manner, free of undue influence and the abuse of power and authority; and how the coastal program requires public confidence in the commission and its practices.

Below is a cut and paste of my email conversation with Louise Warren:

Hi Louise,

Thank you for responding to me and for your answer.

I was not aware of the section you quote. I should have read the entire act. I started with the ex parte communication section of the act and later added the conflict discussion without reading above the "Fairness and Due Process" section. So, the way I read the act now, the legislature has written the act in a way to allow people who have a conflict of interest to participate anyway. Well, that's politics. As for the ex parte communication, I still believe it was improper because the disclosure statement did not fully disclose the discussion and because of the website statement that ex parte discussions that "relate to alleged violations of the coastal act" are "not permissible."

The "quasi-judicial" part of the act gave me the impression that the decisions commissioners made had to be objective. With § 30318, that's not the case and it's disappointing.

Best,

Jim

From: Warren, Louise@Coastal <Louise.Warren@coastal.ca.gov>
Sent: Friday, April 1, 2022 11:33 AM

To: james.coda@comcast.net

Cc: Brownsey, Donne@Coastal <donne.brownsey@coastal.ca.gov>;
KRice@marincounty.org

Subject: FW: Second Request for Recusal of Commissioner Rice

Dear Mr. Coda,

The email below was forwarded to me for response. We appreciate your interest in the Coastal Commission's work.

Commissioner Rice is not required to recuse herself from the National Park Service item related to Point Reyes. The Coastal Act has a specific provision to address exactly this type of situation. Coastal Act section 30318 states:

Nothing in this division shall preclude or prevent any member or employee of the commission who is also an employee of another public agency, a county supervisor or city councilperson, member of the Association of Bay Area Governments, member of the Association of Monterey Bay Area Governments, delegate to the Southern California Association of Governments, or member of the San Diego Comprehensive Planning Organization, and who has in that designated capacity voted or acted upon a particular matter, from voting or otherwise acting upon that matter as a member or employee of the commission. Nothing in this section shall exempt any such member or employee of the commission from any other provision of this article. (Emphasis added).

Thus, Commissioner Rice may vote on the National Park Service item as a member of the Coastal Commission.

In addition, Commissioner Rice has filed an ex parte disclosure form related to her conversation with Congressman Huffman, as required by the Coastal Act.

If you have further questions, please let me know.

Thank you,
Louise

Louise Warren
Chief Counsel, California Coastal Commission
455 Market Street, Ste. 228
San Francisco, CA 94105
(415) 904-5227
Louise.Warren@coastal.ca.gov

Best,

Jim

From: Teufel, Cassidy@Coastal <Cassidy.Teufel@coastal.ca.gov>

Sent: Friday, April 1, 2022 2:42 PM

To: james.coda@comcast.net; Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>; Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>; donnebrownsey@coastal.ca.gov; Bochco, Dayna@Coastal <dayna.bochco@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Turnbull-Sanders, Effie@Coastal <effie.turnbull-sanders@coastal.ca.gov>; Aminzadeh, Sara@Coastal <sara.aminzadeh@coastal.ca.gov>; steve.padilla@coastal.ca.gov; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>; Groom, Carole@Coastal <carole.groom@coastal.ca.gov>

Cc: 'Kenkel, Craig A' <Craig_Kenkel@nps.gov>

Subject: RE: Second Request for Recusal of Commissioner Rice

Mr. Coda –

Thank you for your letter, which we have reviewed. On your concern about conflicts of interest, please see Coastal Act Section 30318, which addresses the issue of local government officials who are Commission members being allowed to vote on matters in both capacities.

Regards,

Cassidy

*Cassidy Teufel
Manager
Energy, Ocean Resources
and Federal Consistency
California Coastal Commission
455 Market Street, Suite 228
San Francisco, CA 94105-2219
(805) 585-1825
<http://www.coastal.ca.gov/>*

From: james.coda@comcast.net <james.coda@comcast.net>

Sent: Thursday, March 31, 2022 10:34 AM

To: Ainsworth, John@Coastal <John.Ainsworth@coastal.ca.gov>; Huckelbridge, Kate@Coastal <Kate.Huckelbridge@coastal.ca.gov>; Teufel, Cassidy@Coastal <Cassidy.Teufel@coastal.ca.gov>; Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>; donnebrownsey@coastal.ca.gov; Bochco, Dayna@Coastal <dayna.bochco@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Turnbull-Sanders, Effie@Coastal <effie.turnbull-sanders@coastal.ca.gov>; Aminzadeh, Sara@Coastal <sara.aminzadeh@coastal.ca.gov>; steve.padilla@coastal.ca.gov; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Rice, Katie@Coastal <katie.rice@coastal.ca.gov>; Escalante, Linda@Coastal

<linda.escalante@coastal.ca.gov>; Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>;
Uranga, Roberto@Coastal <roberto.uranga@coastal.ca.gov>; Groom, Carole@Coastal
<carole.groom@coastal.ca.gov>

Cc: 'Kenkel, Craig A' <Craig_Kenkel@nps.gov>

Subject: Second Request for Recusal of Commissioner Rice

California Coastal Commission,

Attached is my second request for the recusal of Commissioner Rice. My reason, very briefly, is that Commissioner Rice is also a member of the Marin County Board of Supervisors and the Marin County Board's position (which Ms. Rice voted in favor of) is that it supports NPS's preferred alternative which has been incorporated into its Coastal Consistency Determination and, later, its Record of Decision. Because of her position as a member of the Marin Board, she was in April of 2021, and is now, committed to supporting the Marin Board's and NPS's position. Therefore, she has a conflict of interest.

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Sincerely,

James Coda

THE CCC STAFF HAS BEEN PROVIDED A COPY OF THIS EMAIL AND THE ATTACHED LETTER.

From: ellenfranzwallace@gmail.com
To: Energy@Coastal
Subject: Take down the fence
Date: Saturday, May 28, 2022 9:46:08 AM

Please take down the fence for the Tule elk. Why are we grazing cattle on National Park land anyway. It is supposed to be for wild animals not cattle. We don't need cattle. People don't need to eat so much meat. People will survive longer without it...the people that live the longest live in the blue zone areas and they don't eat meat. Please take down the fence so that the elk can survive...

Ellen Franz Wallace

Sent from my iPhone

From: [Judy Hayden](#)
To: Energy@Coastal
Subject: True Elk
Date: Monday, May 23, 2022 12:46:10 PM

Dear Sirs:

We must save the True Elk. This decision, should not be this hard. Take down the fence. Let these animals run free. They will go where they need to go and I seriously doubt that they will hang around the cattle and sheep that don't belong there. When a human makes a bad decision, bad things happen, and the decisions that you all are making are cruel, inhumane, idiotic, and just all around bad. To let animals that have lived there for years and years die, so a cow can have more grass, when there is plenty of space for them all to thrive is terrible. Just irresponsible.

This world is dying and you all are not helping.

Judy

[Judy Hayden, R.N., Nurse Paralegal](#)
[Donnell, Kieschnick, Wolter & Gamez P.C.](#)
[555 N. Caranchua, Ste 400](#)
[Corpus Christi, Texas 78401](#)
[361-866-8194](#)
[Fax: 361-880-5618](#)

From: [Phoebe Lenhart](#)
To: [Coastal Point Reyes Management Plan](#)
Cc: melanie_gunn@nps.gov; ccutrano@rri.org
Subject: Tule elk behind the fence at Tomales Point
Date: Saturday, April 30, 2022 6:02:10 PM

To whom it may concern,

This email is sent to all the above regarding the inhumane treatment that the tule elk are receiving at Tomales Point.

I insist that the Point Reyes National Seashore be returned to the wildlife and that all cattle be removed promptly. I also insist that the 8 foot fence that was installed be removed promptly, too. This park belongs to the tule elk, wildlife, and the people!

In closing, I would like to suggest that the CA State Parks assume the ownership and management of the Point Reyes National Seashore with all its wildlife. In my opinion, the National Park Service is guilty of animal abuse and is fired by the people.

Thank you in advance for your consideration.

Sincerely,

Phoebe Lenhart
107 Humboldt Rd
Crescent City, CA 95531
(elaphusandfelis2@gmail.com)

Sent from my iPad

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Point Reyes Water Quality
Date: Friday, April 1, 2022 2:11:17 PM

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
To: Krygsman_Vail@Coastal; 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

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 tule 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 dying 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
To: Krygsman_Vail@Coastal; 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

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
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting
Date: Friday, April 1, 2022 2:47:16 PM

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

From: Brenda Carey <brenda@brendacarey.net>
Sent: Friday, April 1, 2022 2:47 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

Dear Commission,

I am saddened to learn that you voted against the best interest of the ecological health, and against the will of most people who live in this area, to continue to allow the expansion of private, for-profit cattle ranching in the Point Reyes National Seashore. I am especially disgusted to hear that the cattle ranch leases are being extended!

It seems that some members of this commission care a great deal about the water quality of this seashore and the creatures for whom it is their natural habitat, such as elk and seals (not cows). Others on this commission should be investigated for their conflicts of interest that are causing them to vote against protecting this biodiverse and fragile seashore that my family and I love to visit.

We have all witnessed the continuing decline in water quality in this park, as cattle ranching is taking over this public land. The fact that a water quality report has not been done, and continues to be procrastinated on, really smacks of impropriety. Superintendent Craig Kenkel promised a water quality report. We are waiting. Let's make it happen and get to the bottom of how much damage these cattle are causing. Then let's put a stop to this nonsense and restore this park to actual public parkland instead of some red neck's private cow poop dump.

It is upsetting to watch the deterioration of this beautiful park land while this commission, who should be caretakers, are allowing private for-profit businesses that are so detrimental to this environment have their way with the place.

No more delays! This park belongs to the public and as a member of the public, I am joining with many others who are demanding that this commission take proper steps to protect this area. That starts with good water quality testing! The water quality of this area is so important to us all. Please do the right thing and stop the delays.

Sincerely,

Brenda Carey

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting
Date: Friday, April 1, 2022 2:24:29 PM

From: Bev Alexander <smileybev@gmail.com>
Sent: Friday, April 1, 2022 2:23 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

Dear Members of the California Coastal Commission,

Cattle are not endangered, nor are ranchers, but the waters off and on Point Reyes are.

For many years, there has not been adequate (or any?) monitoring, and the National Park Service has taken no **concrete** steps to correct this situation. Since it is the practice of leasing the land of Point Reyes National Seashore that is the source of pollution, that practice needs to end.

Not adequately monitoring water quality has protected the private ranchers from consequences for many years. Why allow the National Park Service more time to make promises that, if the past is any indication, will never be realized? ("Fool me once...")

Approving the NPS plan would only be giving them more time to protect the ranchers irresponsibility.

Your **denial** of the Park Service's attempts to drag out further their history of non-performance would make a real contribution to the health of the natural environment of Point Reyes and the waters of the Pacific Ocean.

Sincerely,
Beverly Alexander

[Protect Wild Petaluma](#)
341 Liberty Street
Petaluma CA 94952

"Hope is not the conviction that something will turn out well, but the certainty that it is worth doing, no matter how it turns out." - Vaclav Havel

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting
Date: Friday, April 1, 2022 2:13:30 PM

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

From: Susan Bradford <sbradford@sonic.net>
Sent: Friday, April 1, 2022 2:12 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

To the California Coastal Commission,

PRNS's current Superintendent Craig Kenkel, on a stated commitment to provide within one year to the CCC written, comprehensive, science-based water quality testing and enforcement protocols in a climate context, this has not been done, even though they were given more than ample time.

As a member of the public I am demanding that NPS/PRNS officials be held accountable to establish, test, and enforce healthy water quality standards throughout the Seashore—especially on the suspect private, for-profit cattle ranch lease holdings.

The public voiced their overwhelming preference on how the PRNS should act and they have not listened. Please uphold your responsibilities and follow through with your requirements for the PRNS.

Thank you,

Susan Bradford

San Rafael, Ca

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting
Date: Friday, April 1, 2022 2:11:11 PM

From: Molly Flanagan <flamolly@gmail.com>
Sent: Friday, April 1, 2022 2:09 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

I am writing to express my heartfelt concern and dismay about the water quality in Pt. Reyes national seashore. With the operation of ranches, it is imperative for NPS/PRNS to create, test, and enforce healthy water quality standards throughout the park, especially on and around ranch lands. We must ensure this area has safe water to support everyone who needs it to survive in this fragile drought-stricken ecosystem. Thank you for using your authority to ensure this happens.

Sincerely,
Molly Flanagan
Bay Area Resident (Oakland)

From: NorthCoast@Coastal
To: Krygsman.Vail@Coastal; Teufel.Cassidy@Coastal
Subject: FW: Public Comment on PRNS Water Quality for April 7, 2022
Date: Friday, April 1, 2022 2:03:58 PM

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

From: Jennifer Valentine <faboo1028@yahoo.com>
Sent: Friday, April 1, 2022 2:01 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Public Comment on PRNS Water Quality for April 7, 2022

i'm demanding that NPS/PRNS officials be held accountable to establish, test, and enforce healthy water quality standards throughout the Seashore—especially on the suspect private, for-profit cattle ranch lease holdings.

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; Teufel_Cassidy@Coastal
Subject: FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting
Date: Friday, April 1, 2022 2:03:48 PM

From: Arnold Erickson <erickson18@comcast.net>
Sent: Friday, April 1, 2022 2:01 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

We write to urge the Commission to take decisive action on the water quality issues at Point Reyes National Seashore. The park service has had adequate time to address this issue and clean coastal waters are fundamentally incompatible with the private ranching on public land in the area.

The Commission has a singular opportunity to ensure that Point Reyes can be restored to give the highest protection to the water, the biodiversity that exists in the area, and the public interest. Please act accordingly.

Arnold Erickson
Marion Lovett
85 Taylor Dr
Fairfax, CA. 94930

erickson18@comcast.net
415-300-6270

From: NorthCoast@Coastal
To: Krygsman_Vail@Coastal; 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

-----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
To: Energy@Coastal
Subject: FW: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting
Date: Friday, April 1, 2022 3:50:50 PM

From: Carmel Parr <cparr99@msn.com>
Sent: Friday, April 01, 2022 3:50 PM
To: NorthCoast@Coastal <NorthCoast@coastal.ca.gov>
Subject: Public Comment on PRNS Water Quality for April 7, 2022 CCC Meeting

NPS/PRNS officials need to be held accountable to establish, test, and enforce healthy water quality standards throughout the Seashore—especially on the suspect private, for-profit cattle ranch lease holdings.

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

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

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: [Chris Jones](#)
To: Energy@Coastal
Subject: Public Comment on April 2022 Agenda Item 18A - CD-0006-20 (National Park Service, Marin Co.)
Date: Friday, April 1, 2022 3:44:28 PM

Dear Commissioners:

The damage that ranching does to Pt. Reyes National Park is a disgrace. Recent studies have shown that the nearby ocean water quality is dangerous - way beyond the level of unsafe to swim. Ranching may be carried out in many parts of California. Why does it have to be done in a National Park? Why does it persist here at Pt. Reyes, years and years after the leases should have run out - and would have except for the Park Service's cosy relationship with the ranchers.

The Park Service, by their performance and total failure to monitor what the ranchers have been up to in terms of compliance with their operating permits, have lost the public's trust. They cannot be trusted to take the ranch operation permits seriously in the future, as they have never done so in the past.

Please rescind you conditional approval of the GMPA for Pt. Reyes National Seashore.

Chris Jones
436 Trail Ridge Place
Santa Rosa CA 95409

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

From: [Jon Povill](#)
To: [Coastal Point Reyes Management Plan](#)
Subject: Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-
Date: Friday, April 1, 2022 12:27:14 PM

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 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.

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,
Jon Povill
jp@paxdyne.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

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

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

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

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

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

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

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

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

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

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 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 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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

From: [shakil hamid](#)
To: [Coastal Point Reyes Management Plan](#)
Subject: Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-
Date: Friday, April 1, 2022 8:57:11 AM

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.

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.

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 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,
shakil hamid
Shakil_Hamid@usa.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

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

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

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

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

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

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

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

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

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 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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: THERESA L HARLAN <tharlantiger@comcast.net>

Subject: Public Comment on April 2022 Agenda Item Thursday 18a - CD-0006-20

(National Park Service, Marin Co.)

Date: March 30, 2022 at 11:56:34 AM PDT

To: "EORFC@coastal.ca.gov" <EORFC@coastal.ca.gov>

Theresa Harlan

Cc: "pointreyesmanagementplan@coastal.ca.gov"

www.alliance4felixcove.org

<pointreyesmanagementplan@coastal.ca.gov>

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 descendant of the Coast Miwok Felix Family, I frequently drive through ranches to get to my mom's ancestral home at Laird's Landing. I am witness to the impact of grazing on her ancestral Coast Miwok homelands. It's time to end ranching on these beautiful homelands which we all share.

If California leadership, like the California Coastal Commission, does not step forward to protect the waters, lands, plants and wildlife 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.

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>

To:EORFC@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

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Public Comment on PRNS Water Quality for April 7 CCC Meeting

Lonna Richmond <lonnajeane@gmail.com>

Wed, Mar 30, 7:33 AM (9 days ago)

to NorthCentralCoast

Project Name and Application Number: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. (CT-SF)

To The Commissioners,

The NPS has had many many years to mitigate the damage that the ranch/dairy businesses have done in PRNS, and your commission gave them a year to get their act together and still they are asking for more time. This does not show good faith on their part and we want the Commission to vote to re-open the Conditional Consistency Determination from last April. That may require that this be agendized for a future Commission meeting, since it is not on the Agenda as a decision to re-open or not.

And at the future meeting, please re-open the Determination and then deny the previous Finding of Consistency.

The damages done need restoration and require care and attention by the NPS. First get rid of the businesses, the fences, and get restoration people who care about this magnificent park help get back our coastal prairie ecosystem. Water quality will improve greatly as it has in other places that stopped ranching/dairy runoff from manure and pesticides.

Sincerely,

Lonna Richmond

From: Robert Johnston <rajohnston@ucdavis.edu>

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

To: Materials <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