

## CALIFORNIA COASTAL COMMISSION

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# Th10b

## Addendum

November 14, 2023

**TO:** Coastal Commissioners and Interested Parties

**FROM:** Cassidy Teufel, Deputy Director  
Alexis Barrera, Environmental Scientist

**SUBJECT:** Addendum to Staff Report for Annual Informational Briefing for CD-0006-20 (National Park Service)

This addendum includes several edits to the November 2, 2023, staff report for the annual informational briefing on the National Park Service's implementation of the Water Quality Strategy for Management of Ranching Operations for General Management Plan Amendment for Point Reyes National Seashore and North District Golden Gate National Recreation Area.

These edits provide several minor additions and corrections to the staff report and are shown below in ~~striketrough~~ and **bold underline** text.

## Recommended Staff Report Modifications

Page 6, Required Information for Annual Report, second full paragraph:

“Status: Data collected through implementation of the Water Quality Strategy over the course of 2023 is available in Appendix A to this report – the Annual Report and Water Quality Report provided by NPS. As noted on p. 5 of that Water Quality Report, data from previous years can be accessed in several locations:

Previous monitoring data is available through the National Water Quality Monitoring Council Water Quality Portal (available at: <https://www.waterqualitydata.us/>).<sup>2</sup> Analysis of previous data is presented in the park’s General Management Plan Amendment Final Environmental Impact Statement under Appendix L (available at: <https://parkplanning.nps.gov/document.cfm?documentID=106632>), in Voeller et al. 2021 (available at: <https://doi.org/10.1016/j.rama.2021.02.011>), and in Lewis et al. 2019 (available at: <https://doi.org/10.3390/su11195516>).

**In addition, recently collected water quality data from 2023 that has not yet been uploaded to the above locations was submitted by NPS and can be provided by Commission staff upon request.”**

Page 7, Required Information for Annual Report, last paragraph:

*“Monitoring Program 1 (short-term assessment):* As discussed on pages 12-13 of the Annual Report and pages 63-73 of the Water Quality Report, throughout the last year, NPS completed 6-week winter and summer assessment monitoring at 16 sites in the watersheds of the Point Reyes Peninsula. NPS is continuing implementation of the program for Water Year 2024. As described on page 75 of the Water Quality Report, triggering actions are implemented when certain benchmarks for water quality are exceeded during sampling. Triggering actions are implemented soon after monitoring results show water quality exceedances, which includes taking additional grab samples upstream of the monitoring station to find the source of the pollution entering the waterway. In addition to that sampling, ranch operations are also investigated to search for the source of pollution, such as the presence of animals, ground disturbance, and runoff from high use areas entering the waterway. During and after large rain events this past winter, several sites exceeded the E. coli recreational water quality benchmark and un-ionized ammonia triggers.”

Page 11, Required Information for Annual Report, fifth bullet point and first full paragraph:

- ~~“Additionally in late winter 2022-23 NPS completed three additional planting events, on GGNRA ranches planting 43 willows, 11 oaks, 10 buckeyes, and 8 coffeeberry, 4 Coyote brush, 6 twinberry and 20 juncus sprigs. 34 cages were placed to protect plants and removed Himalayan blackberry on a GGNRA ranch riparian area. Approximately 1.3 acres addressed.~~

~~Although the Annual Report was prepared by NPS before the 2023 reports had been submitted, NPS notes that exclusion fencing to reduce pressure on sensitive riparian habitat will continue to be installed throughout the project area. Additionally in 2023, a park rancher completed a livestock water system update to better distribute cattle~~

away from surface water resources in the Tomales Bay watershed. Future plans include road decommissioning and improvement projects in spring 2024. **Activities conducted in 2023 and are planned for early 2024 are summarized below:**

- **370 feet of exclusion fencing was installed on one ranch allotment to protect a tributary to Lagunitas Creek.**
- **Livestock Water Supply extension was installed on one ranch allotment consisting of approximately 5,025 feet of pipeline, 2 troughs, and 2 storage tanks.**
- **Upland and Riparian Vegetation Management and Planting on two Golden Gate National Recreation Area ranch allotments.**
- **Along approximately 200 linear feet of Cheda Creek, 46 total native plants including live oak, buckeye (*Aesculus californica*), coyote brush (*Baccharis pilularis*), coffeeberry, common rush, and coast twinberry (*Lonicera involucrate*) were planted, and invasive blackberry was removed with hand tools. Approximately 75 linear feet of riparian fencing was repaired.**
- **Along approximately 230 linear feet of a tributary to Olema Creek, 56 total native plants including willow, live oak, buckeye, and coffeeberry were planted, and invasive blackberry was removed with hand tools.**
- **NPS plans to implement road decommissioning and improvement projects”**

Page 17, Required Information for Annual Report, first full paragraph:

*“Marin County Environmental Health Services (EHS)*

*Marin County EHS staff are in the process of developing a summary of relevant enforcement efforts to provide Commission staff for inclusion in this report. That summary will be added here when available.*

**On November 14, EHS submitted a summary of enforcement-related work via email to Commission staff, which is provided below:**

***In response to many public complaints (beginning in January 2022) concerning the status of the dairy and ranch septic systems located within the Point Reyes National Seashore boundaries, Marin County Environmental Health Services was tasked with coordination of sanitary inspections with the National Parks Service. Beginning approximately in early February 2022 and continuing until mid-August 2022 all occupied (17) ranches and dairies within the park boundaries were jointly inspected by Marin County EHS and NPS staff to identify the status of the septic systems.***

***Marin County EHS’s role was to assist in technical assistance in the evaluation of the on-site wastewater systems that serve the ranches and dairies located within the park boundaries. EHS staff conducted visual inspections and conducted hydraulic load tests on all the occupied residences and other plumbed structures. After those joint inspections, the identified deficiencies and corrective actions were provided to the National Parks staff. Corrective action was to be conveyed to the ranch and dairy owners by the NPS staff.***

***Marin County has issued two septic repair permits, for the properties had dysfunctional leach fields. These systems are installed and functional currently. One system has been “repaired” by the resident by jetting/clearing out the leach lines and***

**has been determined to be functioning. Several ranches have taken minor corrective actions and are deemed to have acceptable systems. Two ranches have been identified as having overt sewage discharges and are now on a “pump and haul” provision (this is only a temporary solution), a new system will need to be installed. One ranch has obtained a permit to repair a system, but no action has been taken for the installation of the system. Follow-up inspections by Park and EHS staff have been conducted to verify corrective actions throughout current year (2023).**

**Further corrective action is deemed necessary on several dairies and ranches. NPS will need to follow up (as the enforcement agency) on the required corrective actions as was identified in their notice of compliance letters. Marin County EHS will work collaboratively with the NPS in the processing of any permits that will be required for those systems needing repairs.**

Staff Conclusion: **NPS has fulfilled this commitment** ~~In progress.~~”

Page 19, Notable Findings first bulleted section under Water Quality Monitoring Results Summary:

- “Monitoring Program 1: During the six-week winter and summer period, in general the majority of samples taken were within the benchmark range for each parameter, with the exception of *E. coli*.

Winter:

- All dissolved oxygen results collected over the six weeks were within the benchmark range for this parameter.
- 98% of pH samples during this assessment were within the benchmark range for this parameter. **(2% of samples were not within the benchmark range)**
- All specific conductance results were within the benchmark range for this parameter.
- **Thresholds of 25 NTU and 55 NTU based on values in literature for effects on salmonids were included for comparative purposes when describing turbidity results.** 81% of turbidity samples during this assessment were ~~within the benchmark range for this parameter.~~ **below the 25 NTU level. (19% of samples were above the 25 NTU level.)**
- For *E. coli*, all sites in the Drakes Bay Watershed below dairy operations, **three sites in the Kehoe Creek watershed, and two sites on tributaries within grazing operations** exceeded the six-week geomean contact recreation water quality benchmark. **As a result, additional triggered assessment and synoptic monitoring were conducted at these locations. Monitoring revealed runoff from one feeding area, which prompted short-term corrective actions for that site.**
- All ammonia results were within the benchmark range for this parameter.

Summer:

- ~~93%~~**91%** of dissolved oxygen results were within the benchmark range for this parameter. **(9% of samples were not within the benchmark range)**
- 98% **97%** of pH results were within the benchmark range for this parameter. **(3% of samples were not within the benchmark range)**
- All specific conductance results were within the benchmark range for this parameter.
- 98% of turbidity results were ~~within the benchmark range for this parameter~~ **below the 25 NTU threshold. (2% of samples were above the 25 NTU threshold.)**
- For *E. coli*, all sites with flowing water, with the exception of one site, exceeded the six-week geomean contact recreation water quality benchmark.

- For ammonia, ~~only one site was sampled due to low flow of water at other sites~~ **only one site was sampled that sustained flow through the entire summer six-week assessment period, however an additional three sites were sampled until they ceased flowing.** This site **The site with sustained flow** was within the benchmark range for this parameter.”

Page 19, Notable Findings second bulleted section under Water Quality Monitoring Results Summary:

- “Monitoring Program 2: The majority of results from monthly sampling were within the benchmark range for each parameter.
  - ~~79%~~ **81%** of dissolved oxygen results were within the benchmark range for this parameter. **(19% of samples were not within the benchmark range)**
  - ~~94%~~**92%** of pH results were within the benchmark range for this parameter. **(8% of samples were not within the benchmark range)**
  - ~~99%~~**Greater than 99%** of specific conductance values were within the benchmark range for this parameter. **(Less than 1% of samples were not within the benchmark range)**
  - 88% of turbidity measurements from coastal sites were ~~within the benchmark range for this parameter~~ **below the 25 NTU threshold. (12% of samples were above the 25 NTU threshold.)**
  - ~~74%~~ **69%** of E. coli results were within the benchmark range for this parameter. **(31% of samples were not within the benchmark range)**
  - ~~88%~~ **90%** of enterococci results were within the benchmark for this parameter.” **(10% of samples were not within the benchmark)**

Page 19, Notable Findings last bulleted section under Water Quality Monitoring Results Summary:

- Monitoring Program 3: Samples met benchmarks established under the San Francisco Bay Regional Water Quality Control Board’s General Waste Discharge Requirements for Confined Animal Facilities with the exception of ~~one site for pH and specific conductance~~ **pH and specific conductance during the first winter sample event at one site.**

Page 20, Notable Findings fourth and fifth bulleted section under Water Quality Monitoring Results Summary:

- Monitoring Program 4: ~~98%~~ **99%** of samples were within the benchmark range for enterococci. **(1% of samples were not within the benchmark range)**
- Monitoring Program 6: ~~Over half of the results from monthly sampling~~ **82% of the calculated geomeans from summer 2022, winter 2023, and summer 2023** were within **below** the benchmark range for the TMDL five-week geomean benchmark for fecal coliform.
  - ~~Winter: 67% of sites sampled were within the benchmark range for this parameter.~~
  - ~~Summer: All sites sampled were within the benchmark range for this parameter.~~