



September 2, 2022

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

**RE: September 2022 Agenda Item Thursday 10b - CD-0006-20 (National Park Service, Marin Co.)
Request for Commission to NOT APPROVE Unless Amended**

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

The Environmental Action Committee of West Marin (EAC), local environmental nonprofit based in Point Reyes Station, CA submits these preliminary comments for consideration and will be supplementing these comments with our long-term partner, the National Parks Conservation Association (NPCA), in the coming days.

EAC requests the Commission not approve the submitted Water Quality Strategy unless amended.

We want to note that the General Management Plan Amendment (GMPA) was finalized on September 13, 2021 and the public is still waiting for completion of leases with the operators and the implementation framework to fully understand the National Park Service (NPS) plans.

This may be one of the final opportunities the Commission will have to weigh in on the format and information included in the annual water quality report that will provide critical information and transparency to the public on the success of the GMPA implementation.

Therefore, we ask the Commissioners to consider the below items to satisfy Sections 30230 and 30231 of the Coastal Act and increase public transparency in the implementation of the GMPA:

- 1) Require all Conditions to be satisfied that were agreed to in the 2021 Consistency Determination and in 2022 Coastal Commission Meetings and, to improve public transparency, require that NPS update its website to include: the annual report submitted to the Commission, links for water quality results, copies of leases, and Ranch Operating Agreements.
- 2) Include copies of the Ranch Operating Agreements; maps of pending and completed projects; and regulatory limits for water quality results in all tables, graphics, and charts in the annual report to improve public transparency in the implementation of the GMPA.
- 3) Expand the Strategy to define, *improved water quality*, and the milestones the Strategy seeks to achieve in 5 years, 10 years, and 20 year timelines. *Essentially, what is the baseline (current conditions) and*

what water quality targets is the NPS trying to achieve with the GMPA, lease requirements, and Ranch Operating Agreements?

- 4) Commit to retaining long-term sampling metrics in the Strategy. Retaining metrics over time ensures comprehensive long-term monitoring and flag issues with any changed conditions (environmental and operational).
- 5) Require reductions in animals if existing operational infrastructure fails to meet regulatory water quality standards. For example, if a dairy is unable to support the current number of animals due to failing manure management systems, the number of animals should be reduced to the current system capacity until after remedial measures have been implemented and reviewed to protect coastal resources and water quality.
- 6) Request the NPS outline the process for the annual operational ranch inspections, who is present, which partner regulatory agencies will be participating, and when those inspections will occur each year.
- 7) Finally, clarify what happens if an operator consistently fails to meet regulatory and GMPA standards as outlined in their lease agreement. As the Strategy notes, updated leases that are being signed include regulatory requirements for water quality, but it is unclear what actions the NPS will take if those standards are not met as those leases are not finalized and not available for public or commission review.

Thank you for the consideration of our comments.



Morgan Patton
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Environmental Action Committee of West Marin



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Environmental Action Committee of West Marin