

CALIFORNIA COASTAL COMMISSION

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May 10, 2021

Craig Kenkel
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Re: **CD-0006-20, National Park Service**, Consistency Determination, 2020 General Management Plan Amendment for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area

Dear Mr. Kenkel:

On April 22, 2021, by a vote of five in favor, four opposed, the California Coastal Commission conditionally concurred with the above-referenced consistency determination submitted by the National Park Service (NPS) for the 2020 General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area. As specifically described in the NPS consistency determination and Coastal Commission staff report, the NPS requested Commission review of the “detailed elements” of the GMPA: the proposed zoning framework, management of ranch operations, and elk management.

The Commission’s adopted conditions for consistency determination CD-0006-20 provide for the following:

First, that the NPS submit a water quality strategy as follows:

The NPS will provide a water quality strategy for review and approval by the Executive Director before new leases with ranchers are finalized. This strategy 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 impacts on water quality. The water quality strategy shall include the following elements:

1. Proposed 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. The strategy should be 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. Both the strategy and timeline should be updated on an annual basis to reflect information and analysis provided under items 2 and 3 below.

2. Proposed sampling methodology for collecting quantitative water quality data in areas of the GMPA outside of the Tomales Bay watershed, consistent with the strategy provided in item 1 above. Data collection should be sufficient to enable comparison to existing water quality standards (e.g., concentrations of indicators of bacterial contamination as described in existing policies and programs of the State Water Control Board and RWQCB) and to inform identification of water quality-related issues and prioritization of management strategies to address those issues, as described in Item 3 below. The sampling methodology should incorporate guidelines and requirements from state and federal agencies (i.e., RWQCB, State Water Control Board, and/or U.S. Environmental Protection Agency) related to sampling coverage and frequency, sample testing procedures, and reporting of results.
3. A provision for annual NPS reporting of water quality monitoring results and measures taken and planned to address identified water quality issues to the Executive Director. These annual reports should include monitoring results from all previous years, comparison of water quality data with relevant state and federal water quality standards, proposed measures to address identified issues including identification of priority areas for additional ranching or grazing related best practices, and plans (including responsible entities, funding, timing and schedule) for incorporating such practices into ROAs or implementation through other measures, as appropriate.
4. The annual report to the Executive Director shall also describe the best management practices and ranching measures implemented in the previous year. For example, this reporting should include miles of fencing installed or repaired, number of stream crossings constructed or improved, installation of dairy-related infrastructure or practices to address manure management, and other ranching-related measures installed, and their locations and efficacy. This information will help provide details regarding actual implementation of the GMPA.
5. Annual reports shall also include results of continuing or proposed implementation of best management practices and water quality monitoring of ranch lands in the PRNS and GGNRA portions of the Tomales Bay watershed, including Olema and Lagunitas Creeks.

The Commission also adopted the following conditions during its deliberations:

1. 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.

Clarification of Intent: Further discussion at the Commission hearing between the Commission and the NPS resulted in the following clarifications. Submission of the first-year version of the strategy will be prior to NPS approval of any leases under the GMPA. The Commission and NPS also agreed 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.

2. Condition: The National Park Service will return to the Commission in five years so that the Commission can hear from them in regard to the progress that has been made on protection of coastal resources, including a report on the status of elk herd management, and make appropriate advisory comments and allow the public to be heard on these issues.
3. Condition: The National Park Service will come back to the Commission with a Climate Action Plan to address ranching activities at the same time that it brings its water quality strategy to the Commission.

Clarification of Intent: Further discussion at the Commission hearing between the Commission and the Park Service clarified the scope and content of the plan as follows. 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.

Also, not formally adopted as a condition, there was NPS agreement to provide the Executive Director with 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 GMPA planning area.


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.

The link to the CCC staff recommendation and related documents, which we have sent you previously and are posted on our website, can be found at:
<https://www.coastal.ca.gov/meetings/agenda/#!/2021/4>.

If you have any questions, please feel free to call me at (415) 396-9708.

Sincerely,

DocuSigned by:

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Kate Huckelbridge
Deputy Director
Energy, Ocean Resources, and Federal Consistency Division

cc: Coastal Commission, North Central District Office
Office for Coastal Management (OCM) (David Kaiser, Kerry Kehoe)