

Center for Biological Diversity * Coalition to Protect America's National Parks * Sierra Club *
Environmental Action Committee of West Marin (EAC) * Marin Audubon Society *
Resource Renewal Institute * National Parks Conservation Association * Save Our Seashore *

Action for Animals * Alameda Creek Alliance * All-Creatures.org * Animal Legal Defense Fund *
Animals Are Sentient Beings, Inc. * Biodiversity First! * Californians for Western Wilderness *
Center for Farmworker Families * Climate Action Now! * Coalition on the Environment and Jewish Life *
Committee for the Preservation of the Tule Elk * Conservation Congress * Conservation Council for
Hawaii * Conserve Southwest Utah * Dorothy King Young Chapter of the California Native Plant Society *
Earth Island Institute * EarthAction * Eastern Coyote/Coywolf Research * Ecologistics, Inc. * Ecology
Party of Florida * Endangered Habitats League * Endangered Species Coalition *
Environmental Protection Information Center * Eyak Preservation Council * ForELK *
Friends of the Black-tail Prairie Dog * Friends of the Earth U.S. * Fund for Wild Nature *
Gallinas Watershed Council * Global Movement Network * Golden Gate Audubon Society *
Golden West Women Flyfishers * Granite Chief Wilderness Protection League *
Harvard Law School Animal Law and Policy Clinic * Hilton Pond Center for Piedmont Natural History *
Howling For Wolves * In Defense of Animals * Interfaith Council for the Protection of Animals and
Nature * International Marine Mammal Project of Earth Island Institute * Kickapoo Peace Circle *
Klamath Forest Alliance * Madrone Audubon Society * Marin Chapter, California Native Plant Society *
MLK Coalition of Greater Los Angeles * Movement Rights * National Wolfwatcher Coalition *
Northcoast Environmental Center * Northeast Oregon Ecosystems * Northwest Animal Rights Network *
Northwest Arkansas Audubon Society * NY4WHALES * Ocean Voyages Institute *
Oceanic Preservation Society * Old Growth Forest Network * OVEC-Ohio Valley Environmental Coalition
* Patagonia * Paula Lane Action Network (PLAN) * Pelican Media * Petaluma Wetlands Alliance *
Planning and Conservation League * Point Reyes Safaris * Predator Defense * Project Coyote
Public Interest Coalition * Public Lands Conservancy * Public Trust Alliance * Rainforest Action Network*
Regional Parks Association * RESTORE: The North Woods * Sandra Lee Photography *
Santa Cruz Climate Action Network * Save Our Sky Blue Waters * SAVE THE FROGS! * Shark Stewards *
Social Compassion in Legislation * Spottswoode Winery, Inc. * Supporters for Del Norte Roosevelt Elk *
Tending the Ancient Shoreline Hill * The Fire Restoration Group * The Rewilding Institute *
The Wildlife Trust * Topanga Peace Alliance * Turtle Island Restoration Network *
Watershed Alliance of Marin * Wellkind * Western Watersheds Project * Wholly H2O *
Wild Zone Conservation League * WildCare * Wilderness Watch * WildernessPress Photography *
Yellowbilled Tours

January 7, 2021

RE: Coastal Consistency Determination by the California Coastal Commission for the Proposed Point
Reyes National Seashore General Management Plan Amendment CD-0006-20

Dear California Coastal Commissioners,

The National Park Service (NPS) is asking the Coastal Commission to fast-track concurrence with a
Consistency Determination for the Proposed Point Reyes National Seashore General Management Plan

Amendment (GMPA), despite inadequate information regarding coastal zone impacts and the fact that the proposed plan and expanded agricultural activities are not consistent to the maximum extent practicable with the California Coast Management Program (CCMP).

The undersigned **100** 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 Object to the Point Reyes plan at its January 14, 2021 Commission meeting. It is substantively and politically prudent for the Commission to allow time for the Commission staff and the Biden administration's NPS to work together – free of the current political pressure – to finalize this plan.**

As we outline below, this process and plan have been co-opted by the Trump administration in its waning days. There is no reason why the Coastal Commission should fast-track approval of a plan and forgo the careful consideration that Californians and Point Reyes National Seashore deserve.

- Your staff requested that the NPS extend the review deadline through the March 2021 Commission meeting, calling the extension “warranted and necessary.” In response to this request, the NPS set a deadline of January 20, 2021, signaling that the Trump administration is intent on fast-tracking the controversial and complex plan before the new administration assumes office, even if it comes at the expense of not allowing California (through its Coastal Commission) to protect its coastal resources.
- In a multi-party Settlement Agreement in 2017, the NPS, environmental groups, Seashore ranchers, and Marin County agreed that the NPS could have until July 2021 to complete the GMPA. Your staff’s request to have until March 2021 in order to fully review the plan falls squarely within this agreed upon timeframe, yet the Trump administration now wishes to prevent the Commission from conducting a careful review process.
- Your staff has reported a high level of public interest in the GMPA (e.g. Commission staff recently stating it has received more than 20,000 public comments during its review of the GMPA opposing the NPS plan for ranching at Point Reyes National Seashore and Golden Gate National Recreation Area and its spillover impacts to wildlife and other public resources in the coastal zone).
- Your staff has determined that there are significant spillover effects from proposed ranching activities in the plan related to water quality and the protection of marine resources. Your staff believes that the current GMPA is inconsistent with Coastal Act policies related to marine resources (Section 30230) and water quality (Section 30231), particularly for the Point Reyes portion of the GMPA planning area. Your staff also raised concerns that there are limited, insufficient water quality data available for Point Reyes National Seashore, where water quality standards have historically not been met in creeks and wetlands that drain into Drakes Estero, Abbotts Lagoon, and the Pacific Ocean. The efficacy of proposed best management practices and water quality protection measures for coastal resources in the GMPA are, at best, uncertain.

Any water quality assessment plan including a timeline for compliance targets and enforcement measures for Point Reyes should be finalized before any decision on concurrence.

- Your staff's concern that more time was needed to adequately review this GMPA is confirmed in the NPS Consistency Determination and the Commission staff report – both which are missing credible analyses of additional impacts to the environment and public access that will result from the GMPA, many of them with spillover effects on the coastal zone, including impacts to water quality, water quantity, and migratory birds. For example, the Staff Report states the NPS informed Commission staff that “we expect adjustments to the timing of harvest mowing to be limited.” This refers to harvest of silage, which overlaps with bird nesting season, and the NPS is stating that it won't end the unnecessary killing of birds due to this practice. Related, the NPS highlights its lack of commitment to ensure protection of coastal resources, stating (emphasis ours) that “Approaches to minimize harvest impacts on wildlife should be considered when using this Practice Standard (e.g., harvest timing, cutting procedures, and cover patterns).” (GMPA Appendix F pg 25), yet “considerations” does not equal protection.

This is just one of the many examples of the fine details within the GMPA that require additional time for careful analysis and point to why the Commission should object and let the Staff have more time to address by working with a NPS that isn't being politically pressured.

- GMPA also lacks specificity on proposed mitigation measures; the NPS refers to this missing information as “programmatic details” which will be described at some future date and “may be subject to future review by the Commission, after site-specific actions are developed.”

The National Seashore is a keystone for California's interconnected coastal resources. This Federal administration's refusal to accept the Commission's proposed timeline is an attempt to usurp the state's ability to request additional information. It denies the Commission the time necessary to adequately analyze and evaluate how the maintenance of ranching operations and further agricultural development in these national parks will affect coastal resources for decades to come.

The Commission needs more time and information to confidently decide whether the NPS' plan is adequate and consistent with protecting the California coast. Please object to the Point Reyes plan at the January 14 Commission meeting.

Sincerely,

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