



CALIFORNIA
NATIVE PLANT SOCIETY

January 6, 2021

Dan Carl, District Director
North Central Coast and Central Coast
California Coastal Commission
455 Market Street, Suite 300 San Francisco, CA 94105
Dan.Carl@coastal.ca.gov

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

Dear Mr. Carl:

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 conservation organization, the Dorothy King Young Chapter of the California Native Plant Society (CNPS) joins our sister CNPS Chapters and CNPS Conservation Leads in requesting that the Coastal Commission **not** approve conditional concurrence with the Point Reyes plan at its January 14, 2021 Commission meeting.

The Coastal Commission 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 damaging spillover impacts to wildlife and other public resources in the coastal zone.

Coastal Commission staff requested that the NPS extend the review deadline through the March 2021 Commission meeting. In response to this request, the NPS set a deadline of January 20, 2021. Trump's Department of Interior is intent on filing a Record of Decision for the unpopular and environmentally damaging plan before the new administration.

The National Seashore is a keystone for California's interconnected coastal resources.

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Dorothy King Young Chapter P. O. Box 577, Gualala, California 95445



This 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 fairly 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.

We understand that the Point Reyes National Seashore lands and one-quarter-mile strip of tidal lands are not directly within the state coastal zone because of federal ownership, but ranching activities are having a large and long-lasting spillover impacts on coastal zone areas. Many of the proposed expansions of agricultural activities under the NPS Preferred Alternative would affect public uses and resources that are part of the state's 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 does not believe that the current GMPA is consistent 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 is limited, insufficient water quality data available for Point Reyes National Seashore, where water quality standards have not historically been met in creeks and wetlands that drain into Drake's Estero, Abbotts Lagoon, and the Pacific Ocean. The efficacy of proposed best management practices and water quality protection measures designed to protect coastal resources in the GMPA are, at best, uncertain.

The NPS Consistency Determination and the Commission staff report 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, migratory birds, climate change, and social and environmental justice. The 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 Dorothy King Young Chapter, along with our sister Chapters and Conservation Leads in CNPS believe that the impacts to coastal areas, marine and coastal wildlife, and public access are minimized in the NPS's plan and have not been thoroughly evaluated by the Coastal Commission. The Commission needs more time and information to confidently decide whether the NPSs plan is adequate and consistent with protecting the California coast. Any water quality assessment plan for Point Reyes

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should be finalized before any decision on concurrence. Please do **not** approve conditional concurrence with the Point Reyes plan at the January 14 Commission meeting.

Sincerely,

Renée Pasquinelli

Renée Pasquinelli
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