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,

Center for Biological Diversity
Randi Spivak, Public Lands Program Director
Washington, DC

Environmental Action Committee of West Marin (EAC)
Morgan Patton, Executive Director
Point Reyes Station, CA

Resource Renewal Institute
Chance Cutrano, Director of Programs
Mill Valley, CA

Marin Audubon Society
Barbara Salzman, President
Mill Valley, CA
National Parks Conservation Association
Neal Desai, Senior Director, Pacific Region
Sacramento, CA

Save Our Seashore
Gordon Bennett, President
Inverness, CA

Action for Animals
Eric Mills, Coordinator
Seattle, WA

Alameda Creek Alliance
Jeff Miller, Director
Fremont, CA

All-Creatures.org
Veda Stram
Athens, NY

Animal Legal Defense Fund
Cristina Stella, Managing Attorney
Cotati, CA

Animals Are Sentient Beings, Inc.
Sarah B. Stewart, President
Watertown, MA

Biodiversity First!
Linda Seeley, Secretary
Shandon, CA

Californians for Western Wilderness
Michael Painter, Coordinator
San Francisco, CA

California Native Plant Society, Marin Chapter
Carolyn K Longstreth, Board Member
Mill Valley, CA

Center for Farmworker Families
Dr. Ann López, Executive Director
Felton, CA

Climate Action Now!
Markos Major, Director
San Francisco, CA

Coalition on the Environment and Jewish Life
Rabbi Daniel Swartz, Executive Director
Scranton, PA

Coalition to Protect America’s National Parks
Philip A. Francis, Jr., Chair
Washington, DC

Committee for the Preservation of the Tule Elk
Bruce E. Keegan
San Francisco, CA

Conservation Congress
Denise Boggs, Director
Rohnert Park, CA

Conservation Council for Hawaii
Moana Bjur, Executive Director
Honolulu, HI

Conserve Southwest Utah
Tom Butine, Board President
St. George, UT

Dorothy King Young Chapter of the California Native Plant Society
Renee Pasquinelli, Conservation Co-chair
Gualala, CA

EarthAction
Lois Barber, Executive Director
Amherst, MA
Earth Island Institute
David Phillips, Executive Director
Berkeley, CA

Eastern Coyote/Coywolf Research
Jonathan Way, Founder
Barnstable, MA

Ecologistics, Inc.
Stacey Hunt, CEO
San Luis Obispo, CA

Ecology Party of Florida
Cara L. Campbell, Chair
Ft. Lauderdale, FL

Endangered Habitats League
Dan Silver, Executive Director
Los Angeles, CA

Endangered Species Coalition
Tara Thornton, Deputy Director
Washington, DC

Environmental Protection Information Center
Thomas Wheeler, Executive Director
Arcata, CA

Eyak Preservation Council
Carol Hoover, Executive Director
Cordova, AK

The Fire Restoration Group
Craig Thomas, Director
Garden Valley, CA

ForELK
Diana Oppenhiem, Founder
San Francisco, CA

Friends of the Black-tail Prairie Dog
David Orr, Founder and President
Austin, TX

Friends of the Earth U.S.
Ariel Moger, Legislative and Political Coordinator
Washington, DC

Fund for Wild Nature
Marnie Gaede, President
Sebastopol, CA

Gallinas Watershed Council
Judy Schriebman, Secretary
San Rafael, CA

Global Movement Network
Diana Oppenheim, Founder
San Francisco, CA

Golden Gate Audubon Society
Laura Cremin, Vice President
Berkeley, CA

Golden West Women Flyfishers
Cindy Charles, Conservation Chair
San Francisco, CA

Granite Chief Wilderness Protection League
Daniel Heagerty, Director
Mill Valley, CA

Harvard Law School Animal Law and Policy Clinic
Katherine A. Meyer, Director
Cambridge, MA

Hilton Pond Center for Piedmont Natural History
Dr. Bill Hilton Jr., Executive Director
York, SC
Howling For Wolves
Maureen Hackett, Founder and President
Hopkins, MN

In Defense of Animals
Lisa Levinson, Wild Animals Campaign Director
San Rafael, CA

Interfaith Council for the Protection of Animals and Nature
Lewis Regenstein, President
Atlanta GA

International Marine Mammal Project
Mark J. Palmer, Associate Director
Berkeley, CA

Kickapoo Peace Circle
Marcia Halligan
Viroqua, WI

Klamath Forest Alliance
Kimberly Baker, Executive Director
Arcata, CA

Madrone Audubon Society
Susan Kirks, President
Sonoma, CA

MLK Coalition of Greater Los Angeles
Julie Levine
Los Angeles, CA

Movement Rights
Pennie Opal Plant, Co-founder
San Francisco, CA

National Wolfwatcher Coalition
Nancy Warren Executive Director
Duluth, MN

Northcoast Environmental Center
Larry Glass, Executive Director
Arcata, CA

Northeast Oregon Ecosystems
Wally Sykes
Joseph, OR

Northwest Animal Rights Network
Rachel Bjork, Board President
Seattle, WA

Northwest Arkansas Audubon Society
Carol Joan Patterson
Fort Smith, AR

NY4WHALES
William Rossiter, Vice President
New York, NY

Oceanic Preservation Society
Courtney Vail, Director of Strategic Campaigns
Greenbrae, CA

Ocean Voyages Institute
Mary T Crowley, President and Founder
Sausalito, CA

Ohio Valley Environmental Coalition (OVEC)
Vivan Stockman, Executive Director
Huntington, WV

Old Growth Forest Network
Joan Maloof, Executive Director
Easton, MD

Patagonia
Hilary Dessouky, General Counsel
Ventura, CA
Paula Lane Action Network (PLAN)  
Susan Kirks, Chair, Board of Directors  
Petaluma, CA

Rainforest Action Network  
Ginger Cassady, Executive Director  
San Francisco, CA

Pelican Media  
Judy Irving, Executive Director  
San Francisco, CA

Regional Parks Association  
Amelia Wilson, President  
Berkeley, CA

Petaluma Wetlands Alliance  
John Schribbs, President  
Petaluma, CA

RESTORE: The North Woods  
Michael Kellett, Executive Director  
Concord, MA

Planning and Conservation League  
Jonas Minton, Senior Water Policy Advisor  
Sacramento, CA

The Rewilding Institute  
John Davis, Executive Director  
Albuquerque, NM

Point Reyes Safaris  
Daniel Dietrich, Owner  
Inverness, CA

Sandra Lee Photography  
Sandy Zelasko, Owner  
Valley Center, CA

Predator Defense  
Brooks Fahy, Executive Director  
Eugene, OR

Santa Cruz Climate Action Network  
Pauline Seales, Organizer  
Santa Cruz, CA

Project Coyote  
Camila Fox, Executive Director  
Mill Valley, CA

Santa Cruz Climate Action Network  
Lori Andresen, President  
Duluth, MN

Public Interest Coalition  
Marilyn Jasper, Chair  
Loomis, CA

SAVE THE FROGS!  
Kerry Kriger, Ph.D.  
Laguna Beach, CA

Public Lands Conservancy  
Don Neubacher, Board Member  
Point Reyes, CA

Shark Stewards  
David McGuire, Director  
Sausalito, CA

Public Trust Alliance  
Michael Warburton, Executive Director  
Mill Valley, CA

Sierra Club  
Olga Bolotina, SF Bay Chapter Chair  
Berkeley, CA
Social Compassion in Legislation
Nickolaus Sackett, Director of Legislative Affairs
Laguna Beach, California

Spottsoode Winery, Inc.
Beth Novak Milliken & Lindy Novak
St. Helena, CA

Supporters for Del Norte Roosevelt Elk
Phoebe Lenhart
Crescent City, CA

Tending the Ancient Shoreline Hill
Margot Cunningham, Head
Richmond, CA

Topanga Peace Alliance
Julie Levine
Topanga, CA

Turtle Island Restoration Network
Todd Steiner, Executive Director
Forest Knolls, CA

Watershed Alliance of Marin
Laura Chariton, President
Mill Valley, CA

Wellkind
Catriona Glazebrook, Executive Director
Burlingame, CA

Western Watersheds Project
Erik Molvar, Executive Director
Laramie, WY

Wholly H2O
Elizabeth Dougherty, Executive Director
Oakland, CA

WildCare
Alison Hermance, Director of Communications
San Rafael, CA

Wild Horse Education
Laura Leigh, President
Reno, NV

WildernessPress Photography
Andrw Carothers-Liske, Owner
Emeryville, CA

Wilderness Watch
George Nickas, Executive Director
Missoula, MT

The Wildlife Trust
Edward S. Loosli, President
Walnut Creek, CA

Wild Zone Conservation League
Patrick Lee Hord, Director
El Cajon, CA

Yellowbilled Tours
Richard Cimino, Owner
Larkspur, CA