March 25, 2022

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

RE: Request for Commission Action on the Point Reyes Coastal Consistency Determination (CD-0006-20) at the April 2022 Meeting

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

The undersigned 122 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 put the Point Reyes Consistency Determination on the April 2022 Commission Agenda for action by the Commission, including the option to revoke the Conditional Concurrence it issued in April 2021.¹

When the Commission narrowly approved Conditional Concurrence by a 5-4 vote last April, it specifically directed the National Park Service (NPS) to address serious concerns it had with topics ranging from water quality to Tule Elk to climate change. For example, the Commission added a condition that the NPS would bring a water quality strategy to the Commission within 12 months for public review and Commission review and approval.² Importantly, the Commission retained oversight and jurisdiction over this condition, including independently reviewing the NPS’ water quality strategy to determine if it protects coastal resources to the maximum extent practicable, or if it should be rejected. Due to the very urgent concerns raised by the Commission and members of the public, the Conditional Concurrence required action on this matter within 12 months, which would be April 2022.

As Commission staff wrote to the NPS on May 10, 2021, “[t]he 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 NPS must be held accountable to bring forth adequate resource protection strategies within the timeframe the Commission directed, and NPS agreed to, a year ago. Development of these strategies within the one-year timeframe was fundamental to the Commission’s decision to conditionally approve

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¹ The current wording of the April 2022 agenda notes the Commission will consider this matter, but it is not clear that the Commission will vote on if the NPS has produced an adequate Water Quality Strategy within 12 months as required by the Commission: “Coastal Commission consideration of Water Quality Strategy and Climate Action Plan developed by National Park Service (NPS) as specified in Conditions I and IV of the Coastal Commission’s conditional concurrence on Consistency Determination No. CD-0006-20 for the 2020 General Management Plan Amendment for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area, Marin County.”

² “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.”
the Consistency Determination and remains essential for ensuring the protection of one of the most biologically important areas in the state. Please ensure that this Point Reyes Consistency Determination is placed on the April 2022 agenda for action by the Commission, including the option to revoke the Conditional Concurrence.

Sincerely,

Chance Cutrano  
Director of Programs  
Resource Renewal Institute

Neal Desai  
Senior Program Director, Pacific Region  
National Parks Conservation Association

And the following undersigned signatories

- Bonnie Kellogg  
  President  
  2 Wheel Safety Training

- Bonnie Robins  
  Director  
  Access Nature, Lewisboro Land Trust

- Theodora Simon  
  Investigator  
  ACLU of Northern California

- Eric Mills  
  Coordinator  
  ACTION FOR ANIMALS

- Julie Krachman  
  Secretary/Treasurer  
  Adiscovery

- Jeff Miller  
  Executive Director  
  Alameda Creek Alliance

- Theresa Harlan  
  Director  
  Alliance for Felix Cove

- Michael Garrity  
  Executive Director  
  Alliance for the Wild Rockies

- Dr. Ana Noles  
  Owner  
  Ana E Noles, PsyD

- Anna Cramer  
  Owner  
  Ann Kramer Photography

- Craig Elson  
  Founder  
  Arbor Lane Investments

- Christine Kittinger  
  Vice President  
  Assets Unlimited, Inc.

- Jules Evans  
  Principal  
  Avocet Research Associates

- Sally Harati  
  Director  
  Ban Toxic MHF

- Derick Carss  
  Photographer  
  Before it Gets Dark

- Birgit Winning  
  Executive Director  
  Bluecology

- Mike Young  
  Political and Organizing Director  
  California Environmental Voters (formerly CLCV)

- Daniel Glusenkamp  
  Executive Director  
  California Institute for Biodiversity

- Isabella Langone  
  Conservation Program Manager  
  California Native Plant Society

- Michael Painter  
  Coordinator  
  Californians for Western Wilderness

- Jeff Miller  
  Senior Conservation Advocate  
  Center for Biological Diversity

- Lia Schnipper  
  Co-Chair  
  Center Reach Farm, LLC
Cara Dana  
CEO  
CGDana Photography

Michael Murray  
Chair  
Coalition to Protect America's National Parks

Jia Li  
Founder  
Consciously be

Denise Boggs  
Director  
Conservation Congress

James McLachlan  
Director  
Conundrums2Solve

Jason Doherty  
Founder/Director  
Daraja Education Fund

Dave Rothwell  
Owner  
Dave Rothwell Photography

Debbie Fier  
Owner  
Debbie Fier Photography

Nancy Graalman  
Director  
Defense of Place

Dene Miles  
Owner  
Dené Miles Photography

Lindsay Donald  
Founder  
Donald Photography

Tara Thornton  
Deputy Director  
Endangered Species Coalition

Thomas Wheeler  
Executive Director  
Environmental Protection Information Center- EPIC

Morgan Patton  
Executive Director  
Environmental Action Committee of West Marin

Robert Raven  
Founder  
everythingismc2.org

Sheila Newenham  
President  
Exploring Nature

Joe Sweeney  
Organizer  
ForElk

Robin Chiang  
Executive Director  
Friends of Islais Creek

Matt Maguire  
President of the Board  
Friends of Lafferty Park

Larry Campbell  
Conservation Director  
Friends of the Bitterroot

Judy Schriebman  
Secretary  
Gallinas Watershed Council

Joseph III Scalia  
President  
Gallatin Yellowstone Wilderness Alliance

Daniel Heagerty  
Senior Director  
Generation Our Climate

Laura Cremin  
Vice President of the Board  
Golden Gate Audubon Society

Daniel Heagerty  
Executive Director  
Granite Chief Wilderness Protection League

Bradley Angel  
Executive Director  
Greenaction for Health and Environmental Justice

Shanna Edberg  
Director of Conservation  
Hispanic Access Foundation

David McGuire  
Director  
Shark Stewards, Earth Island Institute

Jonathan Huyer  
President  
Huyer Perspectives Photography

Lisa Levinson  
Campaigns Director  
In Defense of Animals

Rudi Dundas  
Director  
Innerlight Photo

Mark J Palmer  
Associate Director  
International Marine Mammal Project, Earth Island Institute
Jill Fortin  
Director  
Jay Witcher Orchestra

Jennifer Hadley  
Owner  
Jennifer Hadley Photography

Jim Zipp  
Owner  
Jim Zipp Photography

John Comisky  
Owner  
John Comisky Photo

Julie Picardi  
Owner  
Julie Picardi Photography

Keith Flood  
Owner  
Keith C. Flood Photography

Kimberly Baker  
Executive Director  
Klamath Forest Alliance

Patricia Puterbaugh  
Principle  
Lassen Forest Preservation Group

Barbara Salzman and Roger Harris  
Conservation Committee Co-Chairs  
Marin Audubon Society

David Long  
Co-President  
Marin Chapter of the California Native Plant Society

Jennifer Valentine  
CEO  
moved in the forest

Michelle Waters  
Owner  
Michelle Waters Art

Deb Castellana  
Director of Strategic Alliances  
Mission Blue

Matthew Polvorosa Kline  
Founder  
Mission Rewild

Victoria Canby  
Executive Director  
Museum of the American Indian

Melissa Samet  
Senior Water Resources Counsel  
National Wildlife Federation

Gerald Meral  
California Water Program Director  
Natural Heritage Institute

Rene Voss  
Director  
Natural Resources Law

Gary Theisen  
Owner  
Northwoods Photo

William Rossiter  
Vice President  
NY4WHALES

Pradip Thachile  
Managing Member  
OH Investors A

Joan Maloof  
Executive Director  
Old-Growth Forest Network

Patricia Mitchell  
Owner  
Patricia Mitchell Photography

Tracy Reiman  
Executive Vice President  
PETA (People for the Ethical Treatment of Animals)

Jonas Minton  
Senior Water Policy Advisor  
Planning and Conservation League

Daniel Dietrich  
Owner  
Point Reyes Safaris

Brian Elliot  
Conservation Director  
Pomona Valley Audubon Society

Camilla Fox  
Executive Director  
Project Coyote

Jeff Ruch  
Pacific Director  
Public Employees for Environmental Responsibility (PEER)

Marilyn Jasper  
Chair  
Public Interest Coalition

Tom Baty  
Board Chair  
Public Lands Conservancy
Douglas Punzel  
Operations  
PunzPics

Tony Sehgal  
Media Producer  
Pygmy Mammoth Productions

Miyoko Schinner  
Founder  
Rancho Compasion

Lisa Owens Viana  
Director  
Raptors Are The Solution

Rhett Taber  
Owner  
Rhett’s Wildlife Excursions

Roy Dunn  
Owner  
Roy Dunn Photography

Drew Feldmann  
Conservation Chair  
San Bernardino Valley Audubon Society

Sandra Zelasko  
Owner  
Sandra Lee Photography

Shani Kleinhaus  
Advocate  
Santa Clara Valley Audubon Society

Gordon Bennett  
President  
Save Our Seashore

Diane Gentile  
Founder  
Save Point Reyes National Seashore

Kathy Kayner  
Secretary  
Save The American River Association

Kerry Kriger  
Executive Director  
SAVE THE FROGS!

Ara Marderosian  
Executive Director  
Sequoia ForestKeeper®

Alan Carlton  
Chair, SF Bay Chapter Federal Lands Committee  
Sierra Club

Nickolaus Sackett  
Director of Legislative Affairs  
Social Compassion in Legislation

Shanti Zinzi  
Owner  
The Nature of the Beast

Jack Gescheidt  
Founder  
The TreeSpirit Project

William Given  
President  
The Wild Source

Chris Brinkman  
President  
TNL Holdings inc

Christine Price  
Founder  
Tribal ground

Scott Webb  
Advocacy Manager  
Turtle Island Restoration Network

Scott Artis  
Executive Director  
Urban Bird Foundation

Nancy Valente  
Principal  
Valente Archaeological Consulting

Laura Chariton  
President  
Watershed Alliance of Marin

Eric Molvar  
Executive Director  
Western Watersheds Project

Alison Hermance  
Director of Communications  
WildCare

George Nickas  
Executive Director  
Wilderness Watch

Will Tabor  
Owner  
Will Taber ornithology

Max Venturi  
Photographer  
Max Venturi Photography

Lisa Robertson  
President & Co-Founder  
Wyoming Untrapped