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November 10, 2023

**Th10b**

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

Via email to: [EORFC@coastal.ca.gov](mailto:EORFC@coastal.ca.gov)

**Re: Agenda Item Th10b: CD-0006-20 Annual informational briefing on the National Park Service's implementation of the Water Quality Strategy for Management of Ranching Operations for General Management Plan Amendment for Point Reyes National Seashore and North District Golden Gate National Recreation Area**

Dear Commissioners:

River Otter Ecology Project, based in Marin County, CA, engages the public in supporting conservation and restoration by linking river otter recovery to the health of our watersheds through research, education, community science, and advocacy. River otters, although not a protected species, are sentinel apex predators whose habitat includes all parts of watersheds, including the coast. Their presence and success are important indicators of ecosystem function and environmental health, including the biological productivity and quality of coastal waters.

A number of our long-term research sites, including at Drakes Bay, Drakes Estero, and Abbotts Lagoon, are in the vicinity or directly downstream of water quality testing sites, and as a result we have direct experience of conditions in those areas. Over a period of years, we have observed and documented putative ranch lease violations, discharges of pollutants, and other negative impacts to coastal resources. We have provided our documentation variously to park management (NPS), the Coastal Commission, and the SF Bay Regional Water Quality Control Board (RWQCB).

The Annual Water Quality Strategy Report submitted by NPS makes clear that water quality at Point Reyes National Seashore (PRNS) is appallingly bad, and that coastal resources continued to be degraded rather than protected to the maximum extent practicable. Ongoing discharges of pollutants threaten the integrity and biological productivity of Drakes Estero Marine Wilderness, the Point Reyes Headlands Area of Special Biological Significance, and the Point Reyes State Marine Reserve. Moreover, the report demonstrates that park visitors may be exposed in all seasons to *E. coli* at levels that are unsafe for humans, which is unconscionable.

Throughout the Federal Consistency process, and continuing in this Annual Report, NPS portrays itself as constrained by ongoing litigation, and unable to fully implement effective management actions without long-term leases and Ranch Operating Agreements. In reality, NPS Management Policies (2006) direct park management to "...take all necessary actions to maintain or restore the quality of surface waters and groundwaters." [Policy 4.6.3]. The Annual Report shows that the scale of corrective actions taken thus far is dwarfed by the problems the ranch inspection and water quality monitoring efforts have documented. **Removal of livestock or reduction in herd sizes would directly improve water quality in the near-term.**

For its part, the Coastal Commission has minimal authority in the Federal Consistency process to compel action by NPS. In contrast, the Commission has significant enforcement powers through its retained coastal permit authority over development by non-federal entities at PRNS. We recognize that the Commission exercises those powers only in the context of the Coastal Development Permit process, and that pursuant to Section 30401 of the Coastal Act, it cannot "duplicate or supersede the authority of any existing state agency," including the RWQCB. Even within those constraints, however, by exercising its enforcement authority at PRNS as broadly and energetically as possible, the Commission can make a positive difference in protecting coastal resources to the maximum extent practicable.

Respectfully,

A handwritten signature in cursive script that reads "Megan Isadore". The signature is written in black ink and is positioned below the word "Respectfully,".

Megan Isadore  
Executive Director

