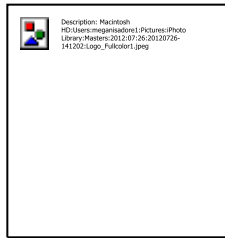


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April 1, 2022

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

Via email to: EORFC@coastal.ca.gov

Re: Agenda Item Th18a: Condition Compliance for Consistency Determination CD-0006-20, National Park Service, 2020 General Management Plan Amendment for the Point Reyes National Seashore and the North District of Golden Gate National Recreation Area.

Oppose Approval of the Water Quality Strategy and Climate Action Plan

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, and community science. 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.

We oppose approval of the National Park Service (NPS) Water Quality Strategy and Climate Action Plan for the following reasons:

1. The submitted Water Quality Strategy is not a good-faith effort to comply with Condition 1 of the Consistency Determination.

In its March 4, 2022 letter to Commission staff, NPS asserted that it could not comply with Condition 1 in a timely manner due to delays in finalizing the GMPA and Record of Decision, and subsequent litigation. The Water Quality Strategy submitted, only three weeks later, largely reiterates information and aspirational plans from Appendices F and L of the GMPA Final Environmental Impact Statement. This information was already available to the Commission and the public in April 2021, when the Commission included Condition 1 in its Consistency Determination Concurrence. If it satisfies Condition 1, then for all practical purposes, Condition 1 has no meaning or effect.

2. Condition 1 requires Executive Director review and approval of the Water Quality Strategy.

Due to NPS' delay in submitting the Water Quality Strategy, the Commission's staff and Executive Director have not had the opportunity to review and assess the Strategy. In its decision-making, the Commission regularly relies on the expertise of staff, and it would be well-served to do so in this case. The Commission can request that NPS withdraw its submission and return in the very near future, after staff has had an opportunity to review the Water Quality Strategy and form a recommendation for your consideration.

3. The Commission may want to consider revoking its concurrence with the Consistency Determination.

Under the present circumstances, the Commission may want to reconsider its concurrence with the Consistency Determination. However, it first may want to consider staff's assessment of NPS' compliance with the conditions of concurrence. To the extent that revocation of the Commission's concurrence may cede its authority under the Coastal Zone Management Act, such a decision may have unintended consequences, and should be carefully considered in conjunction with input from staff.

Thank you for your thoughtful attention to this very important issue.

Respectfully,



Megan Isadore
Executive Director