UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

September 20, 2019

Ms. Cicely A. Muldoon, Superintendent
National Park Service
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, California 94956

Subject: Draft Environmental Impact Statement for Point Reyes National Seashore General Management Plan Amendment, Marin County, California (EIS No. 20190187)

Dear Ms. Muldoon:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The EPA provided several recommendations to the National Park Service in our November 30, 2018 scoping letter pertaining to the Point Reyes National Seashore General Management Plan DEIS, including the suggestion to analyze and discuss the potential impacts to water quantity and quality associated with the NPS authorizing new diversification activities (such as the production of row crops and the raising of new livestock) in the proposed Ranch Core and Pasture subzones. The EPA suggested the NPS include a comparison in the DEIS of the water usage requirements of each alternative, describe the source(s) for the water to be used for the new activities, and analyze and describe the potential impacts from activities such as fertilizer and pesticide use and livestock waste management.

Potential Impacts from Proposed Diversification Activities
The DEIS states that new diversification activities could be allowed in specified subzones under the preferred alternative, Alternative B. These diversification activities could include new types of livestock (pigs, chicken, sheep, and goats), row crops, horse boarding, ranch tours and farm stays, small-scale processing of dairy products, and sale of local agricultural products.

The DEIS describes that these diversification activities would be required to be incorporated into an individual Ranch Operating Agreement prior to implementation, and the ROAs would include required mitigation measures and best management practices. Additionally, the DEIS notes that confinement of livestock species would be required to meet the State Water Resources Control Board regulations for waste management and any other applicable regulations, and that row crops would be limited to 2.5 acres per ranch, could not be sustained by irrigation, and would be allowed only in previously disturbed areas in the Ranch Core subzone.

The EPA recognizes the efforts made by the NPS to ensure impacts associated with these diversification activities are addressed. We suggest the NPS provide additional information in the FEIS, however, regarding the potential impacts associated with these activities. For instance, some of the land contained

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cc via email: Leslie Ferguson, San Francisco Bay Regional Water Quality Control Board
Janet O'Hara, San Francisco Bay Regional Water Quality Control Board

Connell Dunning, Acting Manager
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in the Ranch Core subzone, such as the areas within alluvial fans, are in low-lying areas that could be vulnerable to flooding, and existing or proposed BMPs may not be sufficient to prevent or mitigate impacts from areas subject to repeated flooding events. Similarly, while we commend the NPS for limiting proposed crop production to previously disturbed areas, we have questions regarding the amount of water that will be required to sustain these crops, and whether row crops may be sited in low-lying areas susceptible to erosion, runoff, and flooding, thereby potentially introducing fertilizers and pesticides into impaired water bodies, including Tomales Bay, which is on the Clean Water Act section 303(d) list for pathogens, mercury, nutrients, and sedimentation.

Recommendations:
Include in the FEIS an assessment of the water usage for all proposed diversification activities, across all ranching and dairy operations. Identify the source(s) of water, and proposed water transport, for these activities and describe how reasonably foreseeable changes in climate could impact future water supply.

Assess the potential for erosion and flooding for all low-lying areas in the Ranch Core subzone, including all livestock confinement operations with waste management requirements.

Avoid proposing diversification activities in low-lying areas and flood zones. Where activities cannot be avoided, coordinate with the San Francisco Bay Regional Water Quality Control Board to identify all project design commitments to reduce future impacts from flooding events.

We note that effective October 22, 2018, the EPA no longer includes ratings in our comment letters. Information about this change and the EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: https://www.epa.gov/nepa/epa-review-process-under-section-309-clean-air-act. The EPA appreciates the opportunity to review this DEIS, and we are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD to the address above (mail code: TIP-2). If you have any questions, please contact me at 415-947-4161, or contact Jason Gerdes, the lead reviewer for this project. Mr. Gerdes can be reached at 415-947-4221 or gerdes.jason@epa.gov.

Sincerely