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

October 19, 2020

Carey Feierabend, Acting Superintendent
National Park Service
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, California 94956

Subject: Final Environmental Impact Statement for Point Reyes National Seashore General Management Plan Amendment, Marin County, California (EIS No. 20200186)

Dear Acting Superintendent Feierabend:

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 September 20, 2019 comment letter on the Point Reyes National Seashore General Management Plan DEIS. These recommendations or requests for additional information focused on the proposed Ranch Core subzone, and the potential for proposed new diversification activities (such as the raising of livestock and cultivation of row crops) to be sited in low-lying areas. These low-lying areas could be 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. Additionally, we had questions regarding the amount of water that will be required to sustain these newly introduced crops.

We suggested the FEIS include: an assessment of the water usage for all proposed diversification activities, across all ranching and dairy operations; the source(s) of water, and proposed water transport, for these activities and a description of how reasonably foreseeable changes in climate could impact future water supply; and an assessment of 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. Finally, we recommended avoiding proposing diversification activities in low-lying areas and flood zones, and where activities cannot be avoided, coordinating with the San Francisco Bay Regional Water Quality Control Board to identify all project design commitments to reduce future impacts from flooding events.

We appreciate the additional information included in the FEIS pertaining to potential water use from proposed diversification activities, including an estimate of the volume of drinking water used by newly introduced livestock such as goats, chicken, and horses. The water use estimates included in the FEIS, however, do not account for the water consumption associated with many of the proposed diversification activities, including horse boarding facilities and overnight guest accommodations. We suggest that the Park Service commit in the Record of Decision that any requests to change ranch operating agreements to accommodate new diversification activities include an assessment of the water use anticipated from

said activities, as well as a description of the source of water to be used. We recommend the assessment also include an analysis determining whether the additional water use could impact the streamflow or water quality of sensitive resources.

In response to our concerns about activities in low-lying areas, the Park Service includes several mitigation and management measures in Appendix F to reduce impacts from proposed activities, including row crops. We note that while these measures are designed to minimize impacts from proposed activities, there is still potential for discharge of pollutants into sensitive waterbodies such as Tomales Bay. We recommend the Park Service commit in the ROD to avoid diversification activities in low-lying areas and flood zones, and where activities cannot be avoided, coordinate with the San Francisco Bay Regional Water Quality Control Board to identify and reduce water quality impacts to the greatest extent possible.

The EPA appreciates the opportunity to review this FEIS. If you have any questions, please contact me at 415-947-4167, 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,

JEAN PRIJATEL

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Jean Prijatel
Manager, Environmental Review Branch

cc via email: Leslie Ferguson, San Francisco Bay Regional Water Quality Control Board

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