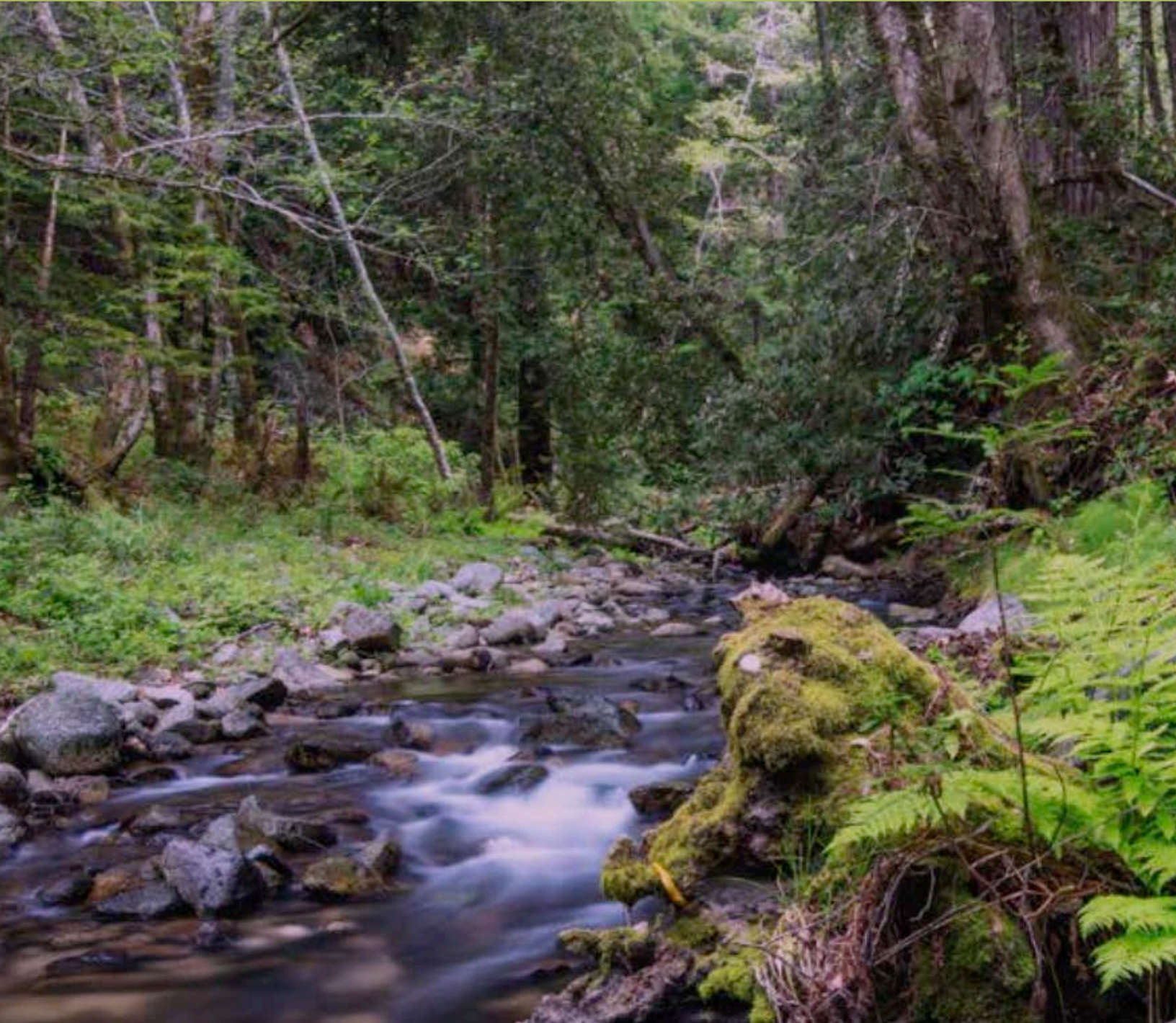




U.S. Department of the Interior  
Bureau of Land Management

# Cotoni-Coast Dairies

California Coastal National Monument



Draft Resource Management Plan Amendment & Environmental Assessment  
Public Comments Report | June 2020

**U.S. Department of the Interior  
Bureau of Land Management**



**Draft Resource Management Plan Amendment  
&  
Environmental Assessment**

**Cotoni-Coast Dairies  
California Coastal National Monument**

**Public Comment Summary Report**

Prepared by the Consensus Building Institute

June 2020



## TABLE OF CONTENTS

<b>Section 1   Overview of Public Comment Report .....</b>	<b>5</b>
1.1. Introduction to this Report.....	5
1.2. Summary of Comments Received .....	6
1.3. How to Find a Specific Comment .....	6
<b>Section 2   General Comments .....</b>	<b>7</b>
<b>2.1. Non-NEPA/BLM Issues .....</b>	<b>7</b>
2.1.1 Outside BLM Jurisdiction, Authority, or Scope .....	8
2.1.2 Addressed through Policy, Regulations, or Administrative Actions.....	8
2.1.3 Issues Considered, but Not Analyzed in Detail .....	8
2.1.4 Cited References .....	9
2.1.5 General Comments, Non-Substantive.....	9
<b>2.2. NEPA Process.....</b>	<b>9</b>
2.2.1 Level of NEPA Documentation .....	9
2.2.2 Stakeholder Consultation and Public Involvement .....	10
2.2.3 Informed Decision.....	11
<b>2.3. Purpose and Need .....</b>	<b>11</b>
2.3.1 Statutes, Policies, and Restrictions .....	11
<b>2.4. Management Alternatives.....</b>	<b>12</b>
2.4.1 Range of Alternatives .....	12
2.4.2 Preferred Alternative .....	14
2.4.3 Alternatives Considered, but Not Analyzed in Detail.....	14
<b>2.5. Alternatives: Menu of Options for Preferred Alternative.....</b>	<b>14</b>
2.5.1 Land Uses .....	14
2.5.2 Cultural and Heritage Resources.....	15
2.5.3 Fire and Fuels .....	15
2.5.4 Vegetation Management .....	16
2.5.5 Biological Resources: Habitat, Wildlife, and Special Status Species .....	16
2.5.6 Services and Facilities.....	17
2.5.7 Access Opportunities .....	18
2.5.8 Hunting / Shooting.....	21
<b>2.6. Environmental Analysis.....</b>	<b>21</b>
2.6.1 Analysis and Uncertainty.....	21
2.6.2 Existing Conditions and Environmental Consequences .....	22
2.6.3 Cumulative Effects .....	24

## Section 3 | Agency, Organization, & Form Letter Comments..... 26

### 3.1. Agency Comments .....26

California Coastal Commission.....	27
California Department of Fish and Wildlife .....	28
California Department of Transportation .....	29
City of Santa Cruz Water Department .....	29
County of Santa Cruz Planning Department .....	30
Santa Cruz County Board of Supervisors .....	32
Santa Cruz County Board of Supervisors, District 3 .....	32
County of San Mateo Parks Department .....	34
United States House of Representatives .....	34

### 3.2. Organization Comments.....35

Amah Mutsun Land Trust.....	35
California Mountain Biking Coalition .....	36
Clean Coalition .....	37
California Certified Organic Farmers.....	37
Conservation Lands Foundation .....	38
California Native Plant Society, Santa Cruz Chapter .....	38
Defenders of Wildlife .....	39
Davenport North Coast Association.....	39
Friends of Juristac .....	43
Friends of the North Coast.....	44
Girls Rock Women’s Mountain Biking.....	47
Mountain Bikers of Santa Cruz .....	48
Mountain Lion Foundation .....	49
Public Lands Conservancy .....	49
Peninsula Open Space Trust .....	50
Rural Bonny Doon Association.....	51
Redwood Meadows Ranch Homeowners Association.....	53
San Andreas Land Conservancy .....	54
Safe Ag Safe Schools .....	55
South Bay Indigenous Solidarity .....	55
Santa Cruz Climate Action Network.....	56
Santa Cruz County Horseman’s Association .....	56
Santa Cruz County Farm Bureau .....	57
San Diego Mountain Bikers Association .....	58
Sempervirens Fund .....	58
Save the Redwoods League .....	60
US Hang Gliding and Paragliding Association .....	61

### 3.3. Form Letters .....62

Form Letter A (MTB) - Author List.....	62
Form Letter A (MTB) - Example.....	64
Form Letter B (ENV) - Author List .....	66
Form Letter B (ENV) - Example .....	67

**Section 4 | Individual Commenters ..... 70**

**4.1 NEPA and General Management/Planning.....70**

4.1.1 RMPA/EA Process and General Management/Planning .....70

4.1.2 Non-NEPA or BLM Issues / Non-Substantive .....71

**4.2 Preservation of Resources and Land Uses .....72**

**4.3 Services and Facilities – the 4 T’s ..... 74**

**4.4 Public Access and Recreation..... 76**

4.4.1 Educational Opportunities and Common Recreation (Hiking, Biking, and Equestrian Use) .....76

4.4.2 Hunting.....79

## SECTION 1 | OVERVIEW OF PUBLIC COMMENT REPORT

### 1.1. INTRODUCTION TO THIS REPORT

This report contains a summary of the public comments (in the form of letters, emails, electronic submissions, and comment forms) received by the Central Coast Field Office from agencies, organizations, and individuals on the Cotoni-Coast Dairies (C-CD) Draft Resource Management Plan Amendment (RMPA) and Environmental Assessment (EA). Pursuant to 43 CFR 46.305, the BLM considered the public comments and revised the Proposed RMPA and associated environmental assessment accordingly. Although the public comments on the draft were voluminous, there are many major themes that were identified repeatedly among the interested parties. Whether or not these comments were thought to merit individual discussion, the BLM responded by modifying the proposed action, improving the impact analyses, making factual corrections, or indicating those circumstances which would trigger additional NEPA review.

This report is organized as follows:

- **Section 1 | Overview of the Comments**  
This section describes the organization of this document; summary of the comments; and how to use this document.
- **Section 2 | General Comment Topics**  
This section presents a summary of general comments received by the BLM on the Draft RMPA/EA. Similar comments have been collected into topic areas for which a single response will be provided.
- **Section 3 | Agency and Organization Comments & Form Letters**  
This section provides a list of the commenters by name of the agency/organization and a codified identifier for each commenting entity. Each entity's comments are summarized and grouped by topics. This section also includes example from letters submitted by numerous entities.
- **Section 4 | Individual Commenters**  
This section lists the names of individuals not associated with a particular agency, organization, or form letter. Individuals who indicated they are affiliated with a specific business or company are noted. While individuals often commented on multiple topics, this section groups individuals by the primary issue mentioned in the comments.

## 1.2. SUMMARY OF COMMENTS RECEIVED

During the public comment period (which lasted from February 14 to April 3, 2020), 862 comment submissions were received from individuals, agencies, and organizations. The commenters included federal and state officials; public interest groups; and private citizens. Public comments on the Draft RMPA/EA were assessed both individually and collectively by the BLM. Several of these were letters and/or emails containing identical text that had been suggested by environmental groups, neighborhood associations, recreation organizations, and agricultural groups. Each comment letter typically contained multiple individual comments on one or more of the topics addressed in the Draft RMPA/EA.

The following sections include a summary of the comments received during the public comment period for the Draft RMPA/EA in order to provide an overview of the concerns expressed during the comment period and to demonstrate the BLM decision-makers are aware of these concerns. All the comments received during the public comment period for the C-CD Draft RMPA/EA are included in the administrative record for the C-CD Draft RMPA/EA and are available for review upon request to the BLM's Central Coast Field Office.

## 1.3. HOW TO FIND A SPECIFIC COMMENT

A numeric identifier was used to develop the "Comment Code" for each comment letter, form, electronic submission and/or email received by the Central Coast Field Office. Each commenting entity has a unique commenter code. For the purpose of this document, multiple comments received by the same agency/organization are combined under the same commenter code.

A legend of "Commenter Codes" used to track comments on the C-CD Draft RMPA/EA is provided below:

### Commenter Code Legend

AG-*NAME*	Agency Comment
ORG-*NAME*	Organization (or Club) Comment
FORM_*NAME*	Form Letter
IND-	Individual Commenter

*The BLM has made a good faith effort to interpret names and comments that were hand-written on comment forms and letters.*

## SECTION 2 | GENERAL COMMENTS

This section provides a summary of comments received on general or recurrent issues. These comments are aggregated by topic. The comment summaries provide a brief overview of the comments for the reader's convenience in reviewing the responses; comment summaries may include one or more example comments to help summarize the issue. The comment summaries are not intended to provide a complete representation or interpretation of the comment's meaning.

The comment topics (or major themes) are listed briefly below and are provided in full in the remainder of Section 2:

### **2.1 Non-NEPA/BLM Issues**

- 2.1.1 Outside BLM Jurisdiction, Authority, or Scope
- 2.1.2 Addressed through Policy, Regulations, or Administrative Actions
- 2.1.3 Issues Considered, but Not Analyzed in Detail
- 2.1.4 Cited References
- 2.1.5 General Comments, Non-Substantive

### **2.2 NEPA Process**

- 2.2.1 Level of NEPA Documentation
- 2.2.2 Stakeholder Consultation and Public Involvement
- 2.2.3 Informed Decision

### **2.3 Purpose and Need**

- 2.3.1 Statutes, Policies, and Regulations

### **2.4 Management Alternatives**

- 2.4.1 Range of Alternatives
- 2.4.2 Preferred Alternative
- 2.4.3 Alternatives Considered But Not Analyzed in Detail

### **2.5 Alternatives: Menu of Options for Preferred Alternative**

- 2.5.1 Land Uses
- 2.5.2 Cultural and Heritage Resources
- 2.5.3 Fire and Fuels
- 2.5.4 Vegetation and Management
- 2.5.5 Biological Resources: Habitat, Wildlife, and Special Status Species
- 2.5.6 Services and Facilities
- 2.5.7 Recreation
- 2.5.8 Hunting / Shooting

### **2.6 Environmental Analysis**

- 2.6.1 Analysis and Uncertainty
- 2.6.2 Existing Conditions and Environmental Consequences
- 2.6.3 Cumulative Effects

## 2.1. NON-NEPA/BLM ISSUES

Many comments raised concerns that are not environmental issues within the context of the National Environmental Policy Act (NEPA) or are outside the scope of the C-CD RMPA/EA because they are not under the authority or within the jurisdiction of the BLM.



### 2.1.1 Outside BLM Jurisdiction, Authority, or Scope

---

#### A. Leaving Property As-Is

Multiple comments requested that the BLM leave the property as-is, citing concerns including the need to protect and preserve remaining open lands and potential impacts to neighboring communities and local public services.

#### B. Outside BLM Jurisdiction or Authority

The BLM received comments requesting that the BLM take management actions that fall under the authority of other entities.

### 2.1.2 Addressed through Policy, Regulations, or Administrative Actions

---

#### A. Planning vs. Implementation-Level Decisions

Several comments requested the BLM make site- or project-specific decisions or management actions. While the RMPA/EA does include some project-specific decisions related to recreation and travel and transportation management (e.g. the location of trailheads and trails), these decisions are typically not included within an RMPA.

### 2.1.3 Issues Considered, but Not Analyzed in Detail

---

#### A. Resource Inventories

Several comments acknowledged the lack of information or data related to robust resource inventories on the C-CD property at the time of developing the Draft RMPA/EA; however, commenters frequently expressed concerns about the implications if planning decisions and management were to move forward without completed inventories and surveys.

***ORG-CLF:** CLF is concerned that the agency intends to limit the RMP development process, thereby not doing their due diligence to assess, document, and disclose necessary information. BLM must adhere to their own guidance and NEPA in developing an RMP, which includes analysis and inventory of objects and values and “rigorously explor[ing] and objectively evaluat[ing]” a range of alternatives*

#### B. Revenue and Expenditures

Comments frequently expressed a need to identify reliable funding sources for implementing the RMPA that would ensure adequate and sustainable management of the C-CD property.

***ORG-DF:** The RMPA fails to explain how these services [e.g., monitoring, enforcement, maintenance, etc.] could be provided given current funding and capacity.*

***ORG-FONC:** [The Preferred Alternative should include:] Access and usage not to exceed sufficiency of funding and personnel to fully implement, monitor, and enforce compliance with the RMPA.*

### C. Patrol/Law Enforcement

*ORG-DNCA: The RMPA/EA does not adequately address the local impacts of the proposed alternatives on fire readiness and response, other emergency services, or security of adjacent landowners and the Davenport community.... While these may be administrative actions that do not fall under the purview of "planning activities," the North Coast community needs a better understanding of what they are to be reassured that activities contemplated in the RMPA do not pose undue burdens on local citizens.*

### D. Cumulative Impacts on Neighboring Properties

Several commenters requested the BLM to thoroughly analyze and discuss impacts (including cumulative impacts) of proposed C-CD development activities on adjacent properties and projects.

## 2.1.4 Cited References

---

### A. 2004 Coast Dairies Long Term Resource Protection and Access Plan

The BLM received comments that indicated some of the RMPA/EA decisions are based on outdated information in the 2004 plan.

There were also requests for the BLM to address potential conflicting information.

*ORG-DNCA: [P]lease address how the RMPA will follow the guidance of the Coast Dairies Long Term Resource Protection and Access Plan particularly the "Goals and Standards" identified in Chapter V, the "Adaptive Management" in Chapter VIII, and the "List of Laws, Ordinances, Regulations, and Standards" in Appendix 9. How will inherent conflicts between the two plans be resolved?*

## 2.1.5 General Comments, Non-Substantive

---

### A. Document Format and Terminology

The BLM received comments conveying challenges to assimilate and provide germane comments due to the document format and length.

### B. Non-Environmental Issues or Non-Substantive Comments

The BLM received multiple comments that were unrelated to environmental issues or impacts and/or lacked substantive input to inform the draft RMPA/EA review (e.g., expressed support or opposition for a particular alternative without additional discussion).

## 2.2. NEPA PROCESS

### 2.2.1 Level of NEPA Documentation

---

#### A. EIS Warranted or Revised EA Supporting FONSI Decision

Multiple commenters were of the opinion that an EA is not the appropriate level of NEPA documentation, and that an environmental impact Statement (EIS) should be prepared. Several commenters indicated that the RMPA should undergo the more robust EIS process, or the EA would require substantial revisions (e.g., robust resource inventory surveys, cumulative impact analyses,

well-defined preferred alternative, and mitigation measures) to sufficiently support a FONSI decision.

**ORG-RBDA:** ...BLM should identify a Preferred Alternative that complies with all applicable state and federal laws and policies, conduct a full Environmental Impact Study before proceeding with any public access, and clearly spell out the mitigations it intends (and has the resources) to implement to reduce all impacts to an insignificant level.

**AG-COUNTY\_SCPD:** The analysis in Chapter 4 would be much clearer and understandable if the impact analysis and conclusions were organized and summarized in a table or separate section. There needs to be a detailed explanation and presentation of how the adverse effects described in Chapter 4 would be avoided, minimized, or mitigated to a less than significant level. For each adverse effect identified in Chapter 4 the analysis needs to identify a project design feature(s) or use restrictions that avoid, minimize or mitigate the adverse effect. This is a critical step needed to support either a FONSI or a requirement for an environmental impact statement or a supplement to the existing environmental impact statement.

## 2.2.2 Stakeholder Consultation and Public Involvement

---

### A. Public Comment Period

Several comments requested more time for the public comment period for at least 30 days, particularly due to the impacts of COVID-19.

### B. BLM Engagement

Multiple comments expressed appreciation for the BLM staff's effort and public involvement process through the scoping period.

The BLM also received comments requesting the BLM provide more details on public involvement through the next stages of ongoing management planning and implementation (e.g., reviewing progress and applying adaptive management measures).

**AG-COUNTY\_SCPD:** Appendix C contains a "General Monitoring Plan" which provides very general information on monitoring and adaptive management.... The RMPA Appendix C General Monitoring Plan should provide more specific information about this process. Are the five-year updates an internal, administrative process, or are they intended to include a publicly available report with opportunity for public participation and comment?

### C. Coordination with Others

Commenters frequently emphasized the importance of consultation and coordination with related projects and planning efforts.

**AG-CCC:** [T]hese nearby projects and planning efforts will collectively increase the volume of visitors to the north coast, as will the RMPA, and it is important to ensure that all of these projects are designed in collaboration with one another, and that the connectivity or potential connectivity between the projects and the properties is clearly defined. At a minimum, planned physical improvements need to be coordinated, but perhaps most importantly, the final RMPA

*will need to identify appropriate and complementary management provisions that can be implemented to ensure that use occurs in a manner that is sustainable and protective of coastal resources throughout the north coast area. The RMPA needs to clearly and explicitly account for this broader context, and include enforceable provisions that can ensure that its implementation will not overwhelm the resource, including the need for adequate funding to fully support integrated use, maintenance, and management, both initially and going into the future, as the surrounding context changes as these other projects and planning efforts come to fruition.*

### 2.2.3 Informed Decision

---

#### A. Additional Studies Needed

Commenters shared concerns that additional studies (e.g., resource inventories and cumulative impact analyses) are needed before an informed decision can be made to move forward with the RMPA. Commenters expressed concerns with the BLM deferring analysis of impacts of the proposed management uses until after selecting a specific mix of uses and trail locations.

***ORG-RBDA:** [The ORG-FONC Comment Letter] contains a number of comments by highly-qualified experts in various fields relevant to management of Cotoni-Coast Dairies in a manner consistent with the above- cited legal requirements. Those experts conclude that your Environmental Assessment is inadequate to the goal of informed decision-making and public participation, but rather gives only cloudy assurances that potential impacts will be addressed.*

## 2.3. PURPOSE AND NEED

### 2.3.1 Statutes, Policies, and Restrictions

---

#### A. Management Requirements

The BLM received comments expressing concerns that the draft RMPA/EA does not align with the intent and stipulations outlined in the FLPMA and Presidential Proclamation 9563 to support public access while ensuring protection of the objects and values identified in the Presidential Proclamation (e.g., sensitive habitats, special status species, etc.). Commenters stated that although the RMPA/EA indicates that public access will have environmental impacts, it does not adequately provide assurances for protecting the property's objects and values. In addition to the Presidential Proclamation, commenters cited other laws, policies, and management restrictions (e.g., Omnibus Public Lands Act, Secretarial Order 3308, BLM policy manuals, and the property deed restrictions) that indicate the RMPA/EA should prioritize conservation over public access.

***ORG-DF:** [Although] adding the C-CD property to the California Coastal National Monument necessitates public access, the original monument proclamation named first and foremost the protection of the "biological treasures" within the Monument. We believe that this perspective should remain paramount and that expanded access to the property should pose minimal impact to these treasures.*

***ORG-SF:** Numerous statutes, policies and legal requirements dictate how this unit is supposed to be managed. They consistently provide clarity that the ecological, archeological and cultural values are paramount and must be preserved.... The Omnibus Public Lands Act - This statute makes clear that units of the system must be managed to a higher conservation standard than other lands managed by the BLM and further supports the argument that recreational activities*

*can occur on national monument lands only when there is adequate protection for the ecological, archeological and cultural values.... Policies of the Department of the Interior and Bureau of Land Management - The Secretarial Order, 15-Year Strategy and Policy Manuals make clear that agency policy prioritizes conservation over other uses, including recreation, within the National Conservation Lands.*

## 2.4. MANAGEMENT ALTERNATIVES

This section 2.4 briefly describes recurrent themes about the RMPA alternatives in general. The following section 2.5 provides more specific public input related to the menu of options (e.g., vegetation management options and potential access points).

### 2.4.1 Range of Alternatives

#### A. Alternative A / No Action Alternative

Multiple commenters supported Alternative A because it offered the greatest protection and preservation of natural resources and habitats; however, many of the same commenters expressed concern the minimal management approach does not ensure long-term stewardship of the property. Several commenters therefore suggested the Preferred Alternative incorporate additional management measures (e.g., comprehensive grazing and vegetation management similar to Alternatives B and C) and adaptive management into the land use plan.

*ORG-CNPS-SC: ...supports Alternative A along with a planned grazing program to maintain the grasslands of the Cotoni-Coast Dairies property. ...provides the greatest protection and preservation of natural resources and habitats. Land use plans must include specific, measurable goals and objectives to effect desired outcomes. We support adaptive management to enable long-term stewardship of the property.*

Other commenters conveyed that Alternative A does not offer sufficient public access opportunities. Several commenters also had concerns with particular components of the public access design (e.g., support or concerns with a particular proposed access point or trail route).

*AG-CCC: As a general point, Alternative A would result in underutilization of the public recreational access potential of the nearly 6,000-acre BLM property, thereby not appropriately maximizing public recreational access opportunities as required by the Coastal Act.... Alternative A does not appear consistent with the Coastal Act, nor does it conform with the terms and conditions of CDP 3-11-035. Thus, it does not appear that Alternative A is an appropriate alternative to pursue for long-term use and management of the property.*

The BLM received several comments stating that Alternative A does not qualify as a No Action Alternative and is therefore noncompliant with NEPA. Commenters called for the BLM to analyze the status quo as the No Action Alternative.

#### B. Alternative B

Several commenters indicated Alternative B offered a suitable balance between Alternative A, which includes the least amount of public access, and Alternative C, which offers the most public access



opportunities. Overall, comments indicated support for the BLM's proposed phased approach to expanding and developing recreational opportunities and access.

**AG-COUNTY\_SCPD:** *Alternative B, or a similar amount of parking and trail development, provides a balance between recreation and wildlife habitat protection.*

**ORG-SBIS:** *[W]e support the lower trail mileage proposed in Alternative B unless or until BLM can demonstrate it has the capacity to manage a more extensive trail network. There is no need to impact cultural or natural resources with ill-conceived or unnecessary trails.*

Concerns and support related to components shared with either Alternative A or Alternative C frequently carried over for Alternative B. For example, several commenters valued the additional level of fuels reduction, vegetation, and invasive species management in Alternatives B and C.

**ORG-SRL:** *Regarding Alternative B, similar to Alternative A, the exclusion of equestrian use along the section of trail in RMZ#1 does not align with the proposed trail use in the SVR public access plan.*

Common concerns with Alternative B often related to allowing recreational hunting with habitat/wildlife enhancements and broadcast spraying of herbicides.

### C. Alternative C

Multiple commenters supported Alternative C because it offered the highest level of public access among the three alternatives. Similar to Alternative B, commenters appreciated the additional management activities to protect communities and the natural environment from major threats like hazardous wildfires and the spread of invasive species.

As with Alternative B, comments overall supported the BLM's proposed phased approach for providing public access. However, several commenters still felt the level of public access and activities would be too harmful (e.g., habitat damage, water quality degradation, community disturbance, etc.).

The increased proposed recreational activities in Alternative C corresponded with increased concerns about the potential negative environmental, social, and economic impacts. For instance, several commenters indicated they were fine with dogs on leash (as described in Alternatives A and B), but were opposed to off-leash areas (as described in Alternative C). Similar to Alternative B, common concerns with Alternative C often related to allowing recreational hunting with habitat/wildlife enhancements and broadcast spraying of herbicides.

**ORG-CAMTB:** *[O]f the three proposed alternatives, only Alternative C provides a minimum viable mileage of trails to provide for a meaningful user experience. We believe that there are additional opportunities to increase trail access and reconfigure the trail layout to be more conducive to public enjoyment while still meeting management goals.*

**ORG-DF:** *[P]roceeding with the scope and scale of development in Alternative C could cause overuse of the property in terms of human access and the extent of disturbance to wildlife, and it*

*should be rejected outright.... In short, despite best intentions, people will push their use opportunities beyond enforceable limits, and this creep of human overuse will exceed the capacity of managers to regulate.*

## 2.4.2 Preferred Alternative

---

### A. Preferred Alternative Missing

The BLM received comments expressing concerns that the RMPA/EA does not define and analyze a preferred alternative.

***ORG-FONC:** The EA is invalid as a matter of law for failing to include a proposed action... By only identifying three conceptual alternatives from which various components will be selected by BLM to divulge a proposed action at a later date, BLM renders it impossible for the public or the agencies – including BLM – to evaluate “the environmental impact of the proposed action”, compare the proposed action to alternatives, or to have a clear basis of choice among options with the issues sharply defined.*

Multiple commenters (e.g., [ORG-FONC](#) and [ORG-DNCA](#)) developed separate alternatives that they requested the BLM consider for the Preferred Alternative and analyze compared to the other alternatives.

## 2.4.3 Alternatives Considered, but Not Analyzed in Detail

---

### A. Recreation Outside CCNM Boundaries

Commenters conveyed the importance for the BLM to manage the CCNM in a way that considers impacts to and by the larger landscape.

***ORG-SF:** Because it is at the center of this network of protected lands, CCD serves as an essential link, both for wildlife and for recreation users, to other portions of the larger landscape. As such, the BLM’s management decisions will determine whether this unit supports, or harms, the conservation and sustainable recreation opportunities that are occurring (or being planned) across these other properties.*

## 2.5. ALTERNATIVES: MENU OF OPTIONS FOR PREFERRED ALTERNATIVE

### 2.5.1 Land Uses

---

#### A. Agriculture and Grazing

Generally commenters conveyed support for the benefits and protection of sustainably managed agriculture and grazing operations. A few raised concerns about managing grazing in a way that minimizes its impact on habitat and wildlife.

***ORG-PLC:** We support BLM’s Alternative A that would “continue to manage livestock grazing as specified in the 2014 Interim Management Plan, replacing and maintaining infrastructure over time to support this program.” We are not supportive of additional grazing. In addition, grazing should be phased out when inappropriate due to resource concerns such as water quality or endangered species.*

## B. Acquisition / Easements

The BLM received comments that expressed both support for and concerns with potential land acquisition and easements. Those who raised concerns stated that Presidential Proclamation 9563 prohibits incorporating any lands into the property that are not already included within the property's boundaries. If adjacent land were proposed to be acquired by the BLM, that would require a separate presidential proclamation/congressional legislation, and the property would need to undergo its own NEPA planning process. Other comments supported the BLM considering opportunities for land acquisition/easements, as this would expand options to design more sustainable and logical public access (e.g., trail networks).

***AG-COUNTY\_SC-BOS-D3:** [W]ith respect to the C-CD property, no lands outside of the current property boundaries can be automatically incorporated into the CCNM. Moreover, if adjacent land is proposed to be acquired by the BLM, that property would have to go through its own process to become part of the CCNM, either through a separate Presidential Proclamation or through Congressional Legislation, where that property would go through its own environmental review and management plan with public participation.*

***FORM\_A-MTB:** Consider acquisition of neighboring lands, or easements, from willing sellers that support C- CD objects and values or provide opportunities for public access to C-CD, consistent with resource management goals and objectives. Collaborate with local experts in trail design and construction to ensure locally appropriate, high quality, and low maintenance trail infrastructure.*

## 2.5.2 Cultural and Heritage Resources

---

### A. Local Tribal Uses

Commenters emphasized a need to protect cultural resources and protect the rights of Tribes. Several specifically mentioned the descendants of the Cotoni People and expressed appreciation for the BLM's engagement with the Amah Mutsun Tribal Band as an advisory partner in the management of the C-CD property.

## 2.5.3 Fire and Fuels

---

### A. Fire Management

Overall, comments frequently identified fire management as a major priority for the BLM.

***ORG-SF:** It is essential that the BLM develop a comprehensive plan to prevent, mitigate, and respond to wildfire. The BLM should develop its wildfire prevention and response plan in close coordination with CalFire, the Bonny Doon Fire Safe Council, and with input from the surrounding communities. We are pleased that the BLM is proposing to continue, and expand, its shaded fuel break projects along Warrenella Road and Bonny Doon Road to mitigate the risks of wildfire and help keep surrounding communities safe. We also strongly support the proposed prescribed burning program on Cotoni-Coast Dairies presented in Alternatives B and C to promote ecological health and reduce the risk of catastrophic wildfire.*

## 2.5.4 Vegetation Management

---

### A. General Management of Vegetation

The BLM received comments that overall supported the BLM implementing a comprehensive weed management plan, particularly to help reduce wildfire risk and the spread of non-native species. Multiple comments encouraged the BLM to work with biological processes for vegetation control (e.g., insects) and ecological succession. Commenters also requested the BLM further articulate its Integrated Pest Management approach for the property. Those that supported the option with the greatest land preservation approach, Alternative A (which does not include substantial new vegetation or fuels management), requested the BLM to develop a planned grazing program to maintain grasslands on the property.

### B. Herbicides and Pesticides

The BLM received many comments expressing concern about the application of herbicides and pesticides. Many expressed opposition specifically to aerial or broadcast application as described in Alternative C. Some comments suggested specific conditions and limitations for applying herbicides and pesticides, including no use of synthetic herbicides/pesticides, use herbicides/ pesticides after exhausting other alternatives, and implement informational and notification procedures for neighboring properties.

***ORG-CCOF:** The monument boundaries are adjacent to a number of certified organic farms for which herbicide drift can cause economic damages.... [The BLM should] remove the option to allow helicopter application of Aminopyralid and Clopyralid or any synthetic herbicide or pesticide within monument boundaries. The risk of drift from aerial applications is too high.*

***ORG-POST:** Selective use of herbicides for managing invasive species (e.g. Clematis vitalba) is important for effective control, but must be implemented in a measured way and not through broadcast spraying (MA-VEG-7).*

## 2.5.5 Biological Resources: Habitat, Wildlife, and Special Status Species

---

### A. Habitat Protection and Restoration

***ORG-POST:** ...strongly supports the creation of core fish and wildlife protection areas that will help ensure biodiversity conservation goals can be achieved more effectively and efficiently. It's unclear whether the Recreation Management Zones (RMZs) were defined to achieve these goals. Core habitat areas should be defined to meet biodiversity conservation goals and located in areas known or likely to be used by wildlife, including creek corridors and ridgelines. Diverse habitat types, elevation gradients, and connectivity must be protected to support climate change adaptation.*

A few comments also requested the BLM further consider Wild and Scenic designation of San Vicente Creek and other creeks, which could help support recovery of native fishes and other aquatic species.

## B. Wildlife and Special Status Species Protection

**ORG-DF:** Any extensive development of the property would trigger the need for Biological Opinions from NOAA Fisheries and the US Fish and Wildlife Service for the various listed species found on the property, including Central California Coast coho salmon, Central California Coast steelhead trout, California red- legged frog, and potentially tidewater goby. It is not clear to Defenders how development of the site could proceed given the high levels of potential disturbance to listed species proposed in several of the RMPA alternatives. The C-CD RMPA already outlines substantial disturbance to listed species caused by general habitat damage, grading of new parking areas, etc. This type of development seems contrary to the California Coastal National Monument Boundary Enlargement proclamation....

**IND-0036:** ...such trail networks (and potential areas where bikers, hikers, and dogs might foray from such networks) should not negatively impact the 40 specific species (plus) that are “objects” to be protected on the C-CD site many of which are concentrated in the riparian areas on site – as well as not deteriorate habitat conditions in ANY of the C-CD site’s riparian areas.

**IND-0273:** Given the documented impacts of human activity on animal communities and the already substantial land area in the Santa Cruz Mountains devoted to recreation, further research is needed to understand how large a geographic area devoted to recreation and at what human densities these animal populations can withstand without declining.... With these results in mind, I ask that BLM have an adaptive roll out of recreation on the property with the most restrictive measures first (such as those outlined in alternative A) combined with monitoring to assess impacts on wildlife. If impacts are determined to be negligible, then and only then would further development be allowed.

## 2.5.6 Services and Facilities

### A. 4 T’s – Traffic, Trauma, Toilets, and Trash

The BLM received several comments concerned with the amenities and services to fully cover what were often referred to as the “4T’s” – Traffic, Trauma (police, fire, and rescue response), Toilets, and Trash. Occasionally, “transients” were also identified as a concern. Commenters appreciated management actions that would minimize public access impacts like providing garbage receptacles in closed containers and removed daily. Commenters also valued amenities that supported equitable access to those with limited mobility (e.g., ADA compliant picnic tables).

Commenters requested evidence that the BLM will have the capacity and resources to implement these amenities and services. Several comments suggested leveraging opportunities such as volunteer backcountry patrols to help expand the BLM’s capacity to monitor and enforce activities on the property.

**IND-0008:** Our North Coast landscape is shared by a continuous stream of travelers. The expense of our local area and other social factors result in an abundance of transients living out of vehicles parked nightly up and down our coast. Any new parking & public toilet facility needs to be designed to mitigate against these becoming relied on for nightly camping.

**IND-099:** ...reoccurring problems had to do with irresponsible behavior by out-of-area visitors who frequented the North Coast beaches and literally left tons garbage for the Santa Cruz



*County to pick up.... There were also continual problems with make-shift and generally poorly designed & inadequate parking space and constant crime due to the remoteness of the area and the relatively long wait for response time from police and other emergency services.*

**ORG-SCC-HA:** *Before the monument can open, we need a sustainable source of funds for maintenance, including trash pickup, bathroom cleaning, and rule enforcement.*

## 2.5.7 Access Opportunities

---

### A. General Access and Allowable Uses

Commenters expressed diverse perspectives on the types and level of allowable recreational activities. As previously mentioned, those who wished to maximize public access generally supported the public access and allowable recreational uses in Alternative C (although not all proposed access/uses were supported), whereas others generally supported the components in Alternative A that limited access and allowable activities to have a smaller environmental impact than the other alternatives.

Commenters generally supported allowing multiple types of activities, as long as these activities are managed in a way that minimizes impacts to the ecosystem and neighboring communities and aligns with current or upcoming planning and management.

Commenters expressed concern about impacts to the neighboring communities and properties and suggested either prohibiting or limiting activities in areas close to these communities and properties.

### B. Research, Education, and Stewardship

Several commenters requested the BLM support opportunities for research and education to enhance awareness and understanding of the Monument and the surrounding landscape. Commenters also recommended supporting volunteer opportunities that could both help address personnel capacity concerns as well as support educating visitors about the Monument's history, culture, geology, biology, trails, etc.

### C. Parking/Access Fees

The BLM received differing viewpoints related to charging fees or permits for parking and/or trail use. Several commenters viewed fees and permits as a reliable source of funding; others were concerned this could lead to potentially dangerous and crowded on-road parking.

**ORG-MBOSC:** *The BLM should charge for parking to create a sustainable funding source for the management of the property. Parking lots should be large enough to prevent overflow parking on local roads.*

**AG-COUNTY\_SC-BOS-D3:** *Parking on the North Coast also requires vigilance to prevent unauthorized and dangerous parking along the coast highway and county roads.... The EA needs to analyze the potential impact on public safety from the charging of parking fees that would result in on-road parking at C-CD access points.*

## D. Trails and Access Points

Commenters shared different perspectives for specific trail design and access points. Several comments raised safety concerns for specific local roads, which they stated the road conditions would be unsafe (e.g., steep grade, narrow, or sharp turns) or impede local services (e.g., Cal Fire responsiveness as the Big Creek Fire Station on Swanton Road). Comments on the potential access points and trailheads were similar to previous comments raised during the scoping period and documented in the [scoping report appendices](#). Comments related to the specific trail design and access points include:

### Access Points / Trails

- **Swanton Road.** Offers access from major roads to the northern part of the property. However, there are concerns related to public safety and road conditions (e.g., tight corners and narrow road) and potentially impeding the Big Creek Fire Station emergency response.
- **Molino Creek.** Proposed trailhead promotes public access; however, the area has sensitive habitat and wildlife.
- **Warrenella Road.** Utilizes existing road to access areas closer to the middle of the property; however, has safety and road condition concerns.
- **Cement Plant Road.** Presents an alternative to using Warrenella Road. However, there were concerns about unsafe road conditions, potential for traffic accidents, and negative impacts to small community nearby.
- **CEMEX Site.** Currently unavailable (county planning underway), but was proposed as an alternative to Cement Plant Road.
- **San Vicente Creek.** Utilizes existing parking and access to the center of the property; however, there are special status species (salmonids) in the creek.
- **Liddell Creek.** Proposed trailhead promotes additional public access; however has sensitive habitat, wildlife, and cultural resource concerns. There are also public safety concerns (flooding potential) and possible land use conflicts (quarry operations and public water supply facility).
- **Bonny Doon Road.** Utilizes an existing road. However, there were concerns about unsafe road conditions and negative impacts to local communities.
- **Yellow Bank Creek.** Potential location for building a pedestrian bridge across Hwy 1.
- **Marina Ranch Gate.** Offers an access point to the southern part of the property; however, there are sensitive and culturally significant areas to avoid.
- **“Northgate” (Hwy 1 marker 30.22).** Proposed as an alternative access point (rather than Swanton Road and Cement Plant Road) that allows for connecting to the San Vicente Redwoods.
- **“Southgate.”** Proposed as an alternative access and trail system for accessing Recreation Management Zone 3. Some comments recommended a hybrid access option of Northgate and Southgate.

### Trail Connectivity

- **San Vicente Redwoods.** In general, overall support for connecting to the San Vicente Redwoods trail. Several requested that trail development prioritize this connection.
- **Rail Trail.** Connecting to the Rail Trail was also generally supported.

- **East-West / North-South.** Several comments requested the BLM to consider connecting the ends of the property together to promote regional trails. Commenters noted that the BLM should avoid sensitive habitat, wildlife, and cultural resource areas.

#### **E. Common Recreational Uses – Hiking, Biking, and Equestrians**

Commenters with concerns mentioned environmental impacts (e.g., erosion) of several of these common recreational uses and recommended limiting these activities to minimize such impacts. Several also expressed concerns about potential user conflicts on multi-user trails. Comments in support of allowing biking, hiking, and equestrian access stated these activities provide the public with an immersive natural experience, and can be managed in a way that minimizes environmental impacts (e.g., close bike and equestrian trails during wet periods to limit erosion and trail failure).

#### **F. Off-Trail Hiking and Camping**

Comments ranged from a desire to have backcountry hiking and camping options to prohibiting off-trail hiking and camping. Comments with concerns about allowing hike-in/off-trail or dispersed camping stated that this may lead to issues such as increased wildfire risk, transient encampments, trash, and crowded parking/trails. Comments suggested either prohibiting camping or minimize impacts (e.g., special use permits, seasonal limitations, and prohibiting campfires).

#### **G. E-bikes**

Comments differed on whether e-bikes should be allowed on trails. Those in support indicated e-bikes enable access by a more diverse array of cyclists and should be allowed on bike access trails in a manner consistent with the BLM regulations. Other commenters expressed safety concerns about the speed of e-bikes, questioned whether e-bikes are allowed under the C-CD deed restrictions, and/or questioned e-bike management given neighboring properties' restrictions (e.g., San Vicente Redwoods prohibits e-bikes). Some comments clarified support for allowing Class I e-bikes, but had concerns about Class II e-bikes.

#### **H. Dogs**

Comments ranged from allowing dogs to be off leash to prohibiting dogs on the property. Those who recommended prohibiting dogs expressed concerns that even with on-leash rules, dogs might disturb sensitive species (e.g., red-legged frog) and vegetation, risk spread of invasive species, and potentially conflict with other recreational users. Other comments conveyed caution and suggested methods to minimize potential dog impacts (e.g., dogs stay on leash, confined to established trails, and/or kept out of sensitive habitats). Among those who supported allowing dogs with limitations, there were diverse opinions on whether to establish enclosed, off-leash areas.

#### **I. Other Specific Recreational Uses**

The following issues were raised less frequently than the vast majority of comments and/or no comments offered an opposing opinion:

- **Hang gliding/paragliding** – Differing perspectives on allowing this activity. Comments in support offered specific strategies to address safety concerns. Others noted the neighboring San Vicente Redwoods property prohibits this activity.
- **Rock climbing/rappelling** – Differing perspectives on allowing this activity. Several comments who voiced concerns also noted the San Vicente Redwoods property prohibits this activity.

- **Fishing** – Commenters generally supported the BLM’s decision to prohibit fishing, citing concerns about impacts to endangered/special status species and habitat.
- **Smoking** – Comments supported prohibiting smoking on the property, particularly due to fire risks. No comments were received that conveyed an opposing view.

### 2.5.8 Hunting / Shooting

---

Commenters expressed diverse perspectives about allowing recreational hunting and/or target shooting. Several indicated allowing hunting conflicts with management restrictions like the Presidential Proclamation. Many shared concerns that hunting/shooting poses public safety risks (particularly due to the property’s relative small size and proximity to other properties/communities) and potential environmental damage (e.g., habitat/vegetation degradation, risk to cultural resources, pollution, wildfire risk, noise disturbance, and affected wildlife). Among these comments, several also expressed opposition to habitat/wildlife enhancement for the purposes of recreational hunting.

Some comments clarified that the only hunting that should be allowed is necessary management actions to reduce non-native wildlife (e.g., feral pigs).

Comments in support for allowing these activities included those stating that hunting can be managed in a safe and sustainable manner through close coordination with California Department of Fish and Wildlife (CDFW). Commenters identified multiple benefits including providing a source of funding to support management and provide an opportunity for an activity unavailable anywhere else in the county. As an alternative to firearms, some requested that the BLM at least allow archery hunting.

Multiple comments, including from the California Coastal Commission ([AG-CCC](#)), indicated they need more information about the proposed hunting-related activities to adequately evaluate potential impacts. CDFW ([AG-CDFW](#)) issued a comment to address several of the concerns raised about hunting and offered several considerations for how the BLM might structure and implement its hunting program.

## 2.6. ENVIRONMENTAL ANALYSIS

### 2.6.1 Analysis and Uncertainty

---

#### A. Adequate Analyses and Baselines

The BLM received multiple comments that stated that the EA did not provide sufficient descriptions of existing conditions (Chapter 3) or analyses on environmental consequences (Chapter 4). This often led to commenters requesting the BLM conduct an EIS process.

***ORG-SF:** ...urges the BLM to complete more thorough baseline inventories of natural and cultural resources prior to commencing any new recreational activity.... Furthermore, the BLM should develop adaptive management criteria that outline the circumstances under which recreation uses might be limited or modified if deleterious impacts are observed. Those adaptive management criteria, and plans, should be completed before new recreation is allowed.*

**ORG-DNCA:** *[P]ublic access is a new and completely different activity on this property. The short-term and cumulative impacts of such a fundamental change in management from a century-old practice must be fully assessed with a full EIS process.*

## 2.6.2 Existing Conditions and Environmental Consequences

---

### A. Biological Resources

The BLM received comments indicated the RMPA/EA did not adequately survey and document specific biological resources (e.g., plant communities, animal species, habitat areas, etc.). Commenters often requested that more detailed surveys and impact reports are completed prior to any activities that might disturb the soil and include adequate monitoring.

**AG-CITY\_SCWD:** *The SCWD completes annual juvenile salmonid monitoring surveys in Liddell Creek and Laguna Creek through snorkel survey methods. In 2015 and 2016, juvenile coho salmon (*Onchorhynchus kitsuch*) were observed in Laguna Creek; in 2018, juvenile coho salmon were observed in Liddell Creek. Please update the document to reflect recent observations of coho salmon in Liddell Creek and Laguna Creek.*

### B. Cultural and Historic Resources

The BLM received comments requesting that archaeological surveys and impact reports are completed prior to any activities that might disturb the soil and include adequate monitoring.

### C. Fire and Fuels

As mentioned previously, comments generally supported proactive management actions to reduce the rise of hazardous fire. A few comments raised concerns with specific strategies such as the effectiveness for current rural road conditions as fuel breaks.

**ORG\_DNCA:** *Based on recent fires in California, where wildfires have jumped Highway 101, rural roads like these cannot be considered firebreaks or even reliable access for suppression. The Wildland Urban Interface (WUI) between C-CD and Bonny Doon, Davenport, New Town, and or Swanton is of particular concern to the DNCA.*

### D. Water Resources

A few commenters were concerned the RMPA/EA utilized previous research on existing water use, water rights, and diversions (e.g., compiled by the Santa Cruz Resource Conservation District in 2013), that they believe to be inadequate. Commenters requested the BLM conduct a more thorough and updated survey of water use, water rights, and diversions.

**AG-CITY\_SCWD:** *In Chapter 3.9, the RMPA-EA references additional research on existing water use and diversions on the Cotoni-Coast Dairies property compiled by the Santa Cruz Resource Conservation District in 2013. As the senior water rights holder on Liddell Creek and Laguna Creek, it is our belief that the referenced document was not sufficiently detailed to adequately identify all existing and potential water uses and restrictions or otherwise fully characterize water rights on the property. Please include an exhaustive study of existing and potential water uses and restrictions, diversions and water rights from Liddell Creek, Laguna Creek, and associated springs and tributaries.*



#### E. Agriculture and Grazing

Commenters shared concerns that the RMPA/EA does not adequately describe agriculture and grazing benefits (e.g., habitat connectivity and vegetation fuels management), nor does the EA sufficiently consider and present mitigation measures to minimize public access impacts on agriculture and grazing.

*ORG-SCCFB: [N]owhere does the EA acknowledge or attempt to identify, evaluate, and mitigate the adverse impact that the proposed alternatives will have on agriculture [e.g., aerial spraying of herbicides adjacent to organically farmed fields, trespassing, vandalism, stress to grazing cattle].*

#### F. Lands and Realty

*AG-COUNTY\_SC-BOS-D3: [T]he RMPA needs to be amended to accurately reflect the language in Proclamation 9563 and to specify that the RMPA only applies to the current C-CD boundaries. This means that the Lands and Realty section needs to be revised to reflect, that with respect to the C-CD property, no lands outside of the current property boundaries can be automatically incorporated into the CCNM.*

#### G. Services and Facilities

The BLM received multiple comments expressing concerns that local services (e.g., local law enforcement) have the capacity to support sufficient monitoring, enforcement, and emergency response. Commenters indicated that local authorities already limited staffing and resource challenges.

#### H. Transportation and Travel Management

Commenters requested more information on the transportation system (e.g., traffic analysis, parking analysis, and design features), both for near-term and long-term projected impacts.

*AG-CT: We request to review the full traffic analysis to see how the increased vehicle trips will impact our facilities. Specifically, we would like to see the impacts of the project at the Caltrans intersections on State Route (SR) 1 to examine what operational and safety issues may occur.*

*AG-COUNTY\_SCPD: A traffic analysis should address overall circulation and quantitatively assess transportation impacts using trip generation calculations. Additionally, a parking analysis should be provided as part of the traffic study to determine the appropriate amount of parking supply to prevent overflow parking on Highway 1. The analysis should also address safety issues, specifically related access off of Highway 1 and pedestrian roadway crossings.*

*ORG-DNCA: There must be a detailed analysis of traffic safety issues based on accurate peak visitor projections now and using future planning horizons, including background traffic.*

#### I. Access and Recreation

Many comments called for more detailed analyses related to increased public access and recreational activities.

**ORG-DNCA:** *Human access to this new addition to the CCNM brings with it likely impacts of human access to sensitive species and habitats never considered under the original CCNM. These impacts, and particularly their cumulative impacts, must be fully considered as new uses and access is developed.*

Commenters frequently requested the BLM provide information and analyses specific to the proposed activity (e.g., specifically analyze hunting impacts).

**J. Noise**

Given that public access is new to the property, several commenters requested the BLM conduct more detailed analyses on potential noise impacts on wildlife and neighboring communities.

**K. Visual Resources**

Commenters called for additional information about facilities and other development to analyze potential visual impacts.

**ORG\_DNCA:** *[T]here is no mention of how the visual impacts of parking areas and associated facilities will be mitigated. The DNCA requests that Appendix D be amended to include visual mitigation measures. Additionally, the DNCA does not support the VRM Class III assigned to the three Alternatives. Changes to the visual landscape should be managed pursuant to VRM Class II. Lastly, site topography is not acknowledged as a key determinant of impact [e.g., parking lot visible from upper marine terraces].*

### 2.6.3 Cumulative Effects

---

The BLM received multiple comments that identified where the EA appeared to lack sufficient analyses of cumulative or synergistic environmental, economic, and social impacts of allowing increased public access. For instance, several comments said the cumulative impacts did not analyze proposed allowable uses in adequate detail (e.g., specifically analyze impacts of recreational hunting).

Concerns were raised about impacts on a range of issues, including adjacent properties and communities, non-federal public services and infrastructure, sensitive plant and animal species, water reliability, pollution, fire risk, illegal activities, etc. Comments also requested the BLM consider how other recreational opportunities in the region might further add to these impacts (e.g., potentially even more traffic and crowding due to overall attraction to the region). Comments called for more detailed and quantified analyses of these cumulative/synergistic impacts and associated mitigation measures.

**ORG-DNCA:** *The RMPA/EA fails to adequately analyze the RMPA's synergistic impacts with the two Reasonably Foreseeable Future Actions (RFFAs), which are identified.... It underestimates both the scale of impacts and the qualitative changes in impacts, which result uniquely from the combination of C-CD actions with other adjacent new recreation uses. In particular the revision must address additive and synergistic effects on the immediate risks to transportation, emergency services, public health, and safety of the Davenport/Swanton communities.*

**ORG-FONC:** *[D]espite acknowledging the existing water quality degradation already adversely affecting steelhead and coho, the EA fails to provide sufficient data to reasonably assess whether the proposed trails, parking areas, visitor numbers and proposed uses, when combined with existing sediment sources to the creeks, will significantly contribute to cumulative impacts to water quality and listed salmonids.*

Comments also indicated that without a separate cumulative effects analysis for each alternative, it is difficult to ascertain each alternative's beneficial or negative impacts.

## SECTION 3 | AGENCY, ORGANIZATION, & FORM LETTER COMMENTS

### Comment Code Legend

AG-*NAME*	Agency Comment
ORG-*NAME*	Organization (or Club) Comment
FORM-	Form Letter

### Agency and Organization Comments

- [Subsection 3.1](#) provides comments submitted by agencies. Table 3.1.1 lists the commenting agencies.
- [Subsection 3.2](#) provides comments submitted by organizations or clubs. Table 3.2.1 lists the commenting organizations.

### Form Letters

The BLM received two types of form letters – one focused on public access and recreational activities, including mountain biking [“Form Letter A” - FORM\_A-MTB], and the other focused on natural resource and recreation/trail management issues [“Form Letter B” - FORM\_B-ENV].

- [Subsection 3.3](#) provides the lists of individuals who submitted either Form Letter A or Form Letter B. An example of each type of form letter follow the list of individuals.

## 3.1. AGENCY COMMENTS

Table 3.1.1 lists the agencies provided written comments on the Draft RMPA/EA.

**Table 3.1.1 Commenting Agency List**

Comment Code	From	Commenter
<b>AG-CCC</b>	California Coastal Commission	Rainey Graeven
<b>AG-CDFW</b>	California Department of Fish and Wildlife	Gregg Erickson
<b>AG-CT</b>	California Department of Transportation	Chris Bjornstad
<b>AG-CITY_SCWD</b>	City of Santa Cruz Water Department	Rosemary Menard Ezekiel Bean Maryna Sedoryk
<b>AG-COUNTY_SCPD</b>	County of Santa Cruz Planning Department	David Carlson
<b>AG-COUNTY_SC-BOS</b>	Santa Cruz County Board of Supervisors	Greg Caput
<b>AG-COUNTY_SC-BOS-D3</b>	Santa Cruz County Board of Supervisors, District 3	Ryan Coonerty
<b>AG-COUNTY_SMPD</b>	County of San Mateo Parks Department	Samuel Herzberg
<b>AG-US_HR</b>	United States House of Representatives	Anna Eshoo Jimmy Panetta

## California Coastal Commission

---

[AG-CCC]

### A. General Management, Planning, and Coordination

The California Coastal Commission described the Commission's role in the RMPA (e.g., jurisdiction under the Coastal Act and the Act's requirements, the coastal development permit [CDP 3-11-035 that includes the C-CD property]). The Commission expressed support for the overall planning and long-term management intent of the RMP.

The Coastal Commission recommended additional interaction and coordination planning with nearby projects and plans (e.g., Local Coastal Program amendments and reuse plan for the Cemex Property and County Regional Transportation Commission rail and trail project), including understanding and addressing combined impacts on the north coast area more broadly.

The agency also encouraged the BLM to engage in ongoing collaboration with the Mutsun Land Trust and other entities representing tribal interests (e.g., California Native American Heritage Commission, California State Office of Historic Preservation, and other Tribal Historic Preservation Officers).

### B. Overall Review of the Alternatives

The Coastal Commission indicated all three alternatives seem consistent with Coastal Commission requirements in regards to maintaining ag lands, no timber operations, and minimize/avoid impacts to archaeological resources.

The agency expressed concerns that Alternative A would result in underutilization of the public recreational access potential of the property, thereby not appropriately maximizing public recreational access opportunities as required by the Coastal Act or the terms and conditions of the coastal development permit (CDP) 3-11-035. The Coastal Commission noted the 2011 Interim Management Plan that the agency approved served as a starting point for public access with the assumption that a significantly greater portion of the property for a wider range of public recreational access opportunities would be available at a later date. The Coastal Commission stated that both Alternatives B and C appear to be more compliant with the Coastal Act and CDP in terms of offering greater public recreational access opportunities.

The Coastal Commission recommended that the complete array of public access and recreational opportunities (including but not limited to those considered in Alternative C), should be a part of the final RMPA, including considering Liddell Creek and Molino Creek as trailhead opportunities.

### C. Vegetation Management

The Coastal Commission requested more information on the use of grazing and herbicides in the final RMPA/EA, including the goals, methods, and adaptive management strategies identified in a grazing management plan. The agency requested more details on herbicide application (e.g., targeted or applied broadly) and recommended that herbicides be used only after less environmentally damaging alternatives have been exhausted.



#### D. Habitat

The Coastal Commission indicated that Alternative A generally appeared to minimize impacts to Environmentally Sensitive Habitat Areas (ESHA) as required under the Coastal Act; however, the alternative did not include longer-term measures needed to address significant ecological areas.

#### E. Hunting

The Coastal Commission stated it is not clear if hunting is appropriate or allowable under the Coastal Act or CDP. Therefore, the agency recommended the BLM eliminate hunting from the final RMPA unless the final RMPA and EA adequately demonstrates that hunting is consistent with these property management requirements. The RMPA and EA would also need greater detail on how hunting would be administered, managed, regulated, and monitored.

#### F. Parking Fees

The Coastal Commission recommended that the BLM provide free parking, which aligns with Coastal Act direction (Section 30213) to support lower-cost or free access and avoid incentivizing the public to seek free options and parking illegally or haphazardly. If parking fees will be used, the final RMPA/EA should adequately demonstrate the need for parking fees and describe a fee-based program.

#### G. Visual Resources

The Coastal Commission stated that Alternatives B and C appeared to minimize adverse impacts to visual resources. Alternative A also appeared to minimize visual impacts; however it did not align with the Coastal Act's intent to maximize ocean and coastal view opportunities. The agency spoke to specific developments that could be constructed/implemented in a way that would be sensitive to public views and support public access (e.g., Highway 1 pedestrian bridge crossing).

### California Department of Fish and Wildlife

[AG-CDFW]

#### A. Hunting

The California Department of Fish and Wildlife (CDFW) addressed several recurrent hunting impact concerns raised by the public, particularly those related to safety, wildlife, and noise pollution.

- **Safety.** CDFW articulated numerous ways that hunting and hunters can be regulated to improve public safety (e.g., spatial and physical buffers between hunting and residential areas, designated special hunt days, and limited user groups). CDFW stated that hunter safety has substantially improved since implementing State-required safety trainings.
- **Wildlife.** CDFW clarified how hunts can be structured to significantly reduce negative impacts to sensitive wildlife (e.g., limit allowable game species and hunter use levels). CDFW stated that hunter use levels should be established base on baseline game population surveys and should include follow-up monitoring in conjunction with CDFW.
- **Noise Pollution.** CDFW indicated that noise pollution should be negligible, as shooting a firearm while hunting occurs infrequently due to the nature of the sport.

## California Department of Transportation

---

[AG-CT]

### A. Traffic

The California Department of Transportation (Caltrans) stated that it supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. The agency requested review of the full traffic analysis to understand how increased vehicle trips would impact Caltrans' facilities (e.g., operational and safety impacts and needed improvements). Caltrans noted that new direct access to Highway 1 should not be considered as an alternative. Any work completed in the State's right-of-way will require an encroachment permit from Caltrans and must be done to Caltrans' engineering and environmental standards, and at no cost to the State.

## City of Santa Cruz Water Department

---

[AG-CITY\_SCWD]

### A. General Management, Planning, and Coordination

The City of Santa Cruz Water Department (SCWD) described its water supply and infrastructure system that occurs within or near the project area (e.g., raw water pipeline north from Laguna Road and forks to two diversion facilities). The agency also explained it has two pending Habitat Conservation Plans (HCPs) and one complete HCP, some of which occur within the project area.

Therefore, SCWD urged the BLM to plan and design projects appropriately to avoid impacts to SCWD's water supply and infrastructure system, including impacts to water quantity/quality and protected species. The agency requested early coordination if the BLM anticipated impacts to SCWD facilities or listed species.

### B. Grazing

SCWD expressed concerns that the proposed grazing activities in Alternatives B and C will negatively impact water resources, habitat and wildlife (e.g., reduced surface water flows, eroded habitat, reduced/damaged vegetation, increased sedimentation, and increased nutrients from manure). The agency requested the BLM analyze water quality impacts due to grazing activities and more detailed information regarding the water source for the proposed infrastructure improvements and any anticipated changes in water demand from Liddell Creek or Laguna Creek as a result of changes to total pasture area, total head of cattle, and updated water infrastructure.

### C. Water Use and Water Rights

SCWD expressed concern that the RMPA/EA utilized previous research on existing water use and diversions that SCWD believes did not adequately identify and characterize water use and water rights. The agency requested the BLM include an exhaustive study of existing and potential water uses and restrictions, diversions and water rights from Liddell Creek, Laguna Creek, and associated springs and tributaries.

The agency also requested the BLM fix a typographical date error about SCWD's water rights - the document should state that SCWD procured rights to the property surrounding Liddell spring, Liddell Creek, and associated water rights, including downstream riparian rights, in 1913 and operates its diversion under senior pre-1914 water rights.

**D. Fire and Fuels**

SCWD requested that the BLM describe the increased potential for, and impacts of, wildland fires due to increased recreation activity particularly from mountain bikes and camping.

**E. Vegetation Management - Herbicides**

SCWD expressed concerns about protecting source water from potential herbicide contamination. The agency requested the BLM expand herbicide buffer zones to include and protect all water bodies and features that potentially connect to water sources (e.g., karst features).

**F. Special Status Species**

SCWD noted juvenile coho salmon were observed in Laguna Creek (in 2015 and 2016) and Liddell Creek (in 2018), and requested the RMPA/EA be updated to include these recent observations of salmonids.

The agency stated that the RMPA/EA should be corrected to reflect that SCWD diversions in Liddell Creek and Laguna Creek should not be considered "significant limiting factors," because SCWD voluntarily maintains bypass flows sufficient for salmonids to comply with CDFW regulations.

**G. Trails**

SCWD shared specific concerns with trail designs associated with Liddell Creek (i.e., Bonny Doon Road trailhead and the Liddell Creek Trail, Alternative A), and that these design features will negatively impact the sensitive habitat, wildlife, and water resources in the area. SCWD requested the BLM study (prior to development) the potential water, habitat, and special status species impacts from the proposed development in the Liddell Creek area.

SCWD was also concerned with the proposed Cotoni Trail (Alternative B) and Yellow Bank North Loop Trail (Alternative C), where recreational use could lead to erosion and security risks to pipeline infrastructure and the potential degradation of critical access routes. SCWD requested the BLM describe all preventative and enforcement measures that will be taken to prevent the creation and use of unauthorized trails and closed access roads throughout the project area.

## County of Santa Cruz Planning Department

[AG-COUNTY\_SCPD]

**A. RMPA/EA and FONSI**

Santa Cruz County staff called for the BLM to more clearly describe how it arrived at the draft Finding of No Significant Impact decision based on the environmental analysis described in Chapter 4. For instance, County staff requested a detailed explanation and presentation of how the adverse effects described in Chapter 4 would be avoided, minimized, or mitigated to a less than significant level (e.g., identify a project design feature(s) or use restrictions that avoid, minimize or mitigate the adverse effect).

**B. General Management**

County staff indicated that Alternative B, or a similar amount of parking and trail development, provided a balance between recreation and wildlife habitat protection. County staff encouraged the BLM to incorporate best management practices and mitigation projects to compensate for

development impacts on wildlife and native plant communities (e.g., removal of non-native plants, habitat enhancement for special status species, etc.).

County staff requested that the General Monitoring Plan (Appendix C) include more details on the monitoring and adaptive management process, including public involvement during management evaluation.

#### C. Vegetation Management

County staff requested more information about the BLM's integrated pest management (IPM) policy and Weed Management Plan and offered several resources for reference and coordination (e.g., County IPM policy and roadside vegetation management plan and the County Weed Management Area).

County staff did not support the use of helicopter herbicide spraying, expressing concern aerial spraying would impact adjacent communities and farms.

County staff supported the use of fire to manage and restore the landscape.

#### D. Habitat and Wildlife

County staff called for the RMPA/EA management actions to include provisions for identifying and considering less environmentally damaging alternatives, which would make these actions more consistent with County policy and local laws.

County staff preferred the Alternative B trail routes (compared to Alternative A) that better protected the Molino Creek and Liddell Creek sensitive areas. County staff also stated that San Vicente Creek should be identified as a coho salmon and steelhead stream.

#### E. Trails and Access Points

County staff called for more information or additional analyses for trail uses (e.g., dogs with or without leashes; single and/or multi-use trails) and trail alignments (particularly to avoid existing wildlife communities). County encouraged offering "hiking only" trails for visitors to have a quieter experience option without constantly being on alert for bikes.

County staff were concerned with several of the proposed trail alignments and parking options:

- **Swanton Road.** Potential traffic/community impacts.
- **Bonny Doon Road.** Potential disturbance to riparian and scenic views and safety concerns.
- **Liddell Creek.** Located within a floodplain and riparian woodland area.
- **Warrenella Road Top.** Potential conflicts with other uses of the private Warrenella Road; uncertain if minimization measures such as acquiring access easements and parking fees are viable.

Staff specifically did not support the proposed parking alternative at Bonny Doon Road and recommended avoiding Liddell Creek parking area (Alternative A), and Warrenella Road Top (Alternatives B and C). County staff offered minimization measures for several of these options (e.g., road improvements and adequate signage and physical barriers and warnings to the public about prohibited areas).

**F. Transportation - Traffic and Parking Strategy**

County staff requested more information on the transportation system (e.g., traffic analysis, parking analysis, and design features). In general, County staff supported fewer parking locations with higher amounts of parking to reduce congestion issues, and more evenly distribute parking locations (and therefore access) within the monument.

**G. Trash**

County staff underscored that one of the most critical aspects of reducing impacts on wildlife will be a robust system for preventing and managing garbage (and funding to maintain that system). Staff offered several specific components to that system (e.g., visitor education, designated picnic areas, no open garbage containers).

County staff were also concerned that overnight camping may lead to increased visitors and associated garbage. Staff instead supported the development of a small number of modest “hike in” camping.

**H. Visual Resources**

County staff expressed concerns that county-designated scenic roads could be impacted by project implementation. Staff offered specific design feature guidelines from the County General Plan (e.g., projects are to be evaluated against the context of their unique environment and regulate structure height, setbacks and design to protect visual and aesthetic resources).

---

**Santa Cruz County Board of Supervisors**

[AG-COUNTY\_SC-BOS]

**A. Comment Period Extension**

Chairman Greg Caput, on behalf of the Santa Cruz County Board of Supervisors, requested an additional 30 days be added to the comment period.

---

**Santa Cruz County Board of Supervisors, District 3**

[AG-COUNTY\_SC-BOS-D3]

**A. RMPA/EA and FONSI**

Santa Cruz County Board of Supervisor, District 3, Ryan Coonerty, stated the RMPA/EA overall lacked sufficient information to adequately justify the preliminary conclusion that the proposed FONSI decision. He said the revised RMPA/EA must either identify a preferred alternative that eliminates the inadequacy in the draft document or revise the environmental analysis in that document to adequately conform to the requirements of NEPA.

Supervisor Coonerty emphasized the Presidential Proclamation 9563 is, and should be more clearly presented in the RMPA/EA as, a guiding document for the RMPA/EA (e.g., fully list all the Proclamation provisions).

The Supervisor also requested some of the terminology be clarified and used consistently to reduce public confusion with the language (e.g., what is considered as “adverse” impacts and when “major” impacts are adverse or beneficial).

**B. General Management, Planning, and Coordination**

Supervisor Coonerty called for the RMPA/EA to provide evidence that the BLM will obtain resources (e.g., staffing and funding) necessary to ensure management sustainability (trash, facilities maintenance, law enforcement, etc).

The Supervisor also expressed concern about impacts on local law enforcement capacity and emergency response on the property, and ensuring sufficient resources to match increased visitors. He requested the EA provide evidence that either the impacts would not be significant with existing personnel or include mitigation measures to ensure adequate personnel.

**C. Lands and Realty**

Supervisor Coonerty stated the Presidential Proclamation 9563 prohibits incorporating any lands into C-CD that are not already included within the boundaries of the C-CD property. The RMPA needs reflect Proclamation 9563 provisions and to specify that the RMPA only applies to the current C-CD boundaries.

**D. Education and Research**

Supervisor Coonerty conveyed appreciation that the RMPA/EA fostered opportunities for partnerships with researchers across a variety of disciplines.

**E. Cultural and Historic Resources**

Supervisor Coonerty expressed support for protecting cultural and historic resources important to the Amah Mutsun and which also provide opportunities for public education of the Native Californians history.

**F. Vegetation Management**

Supervisor Coonerty supported vegetation management methods including cattle grazing, mechanical treatments, and prescribed burning.

The Supervisor opposed utilizing herbicides and pesticides.

**G. Transportation and Access**

Supervisor Coonerty requested more information on the transportation system (e.g., traffic analysis, parking analysis, and parking fees).

The Supervisor conveyed appreciation for design features that foster equitable access (e.g., public restrooms and picnic tables at access points).

The Supervisor expressed concerns with the proposed public access locations in Alternatives A, B, and C. The Supervisor encouraged the BLM to consider and analyze a specific northern access point (i.e., "Northgate" - Highway 1 mile marker 30.22), to minimize impacts on neighbors and county roads while still providing trail access and connectivity to San Vicente Redwoods.

**H. Recreation**

Supervisor Coonerty conveyed support or concerns for the following:



- Support for trail connectivity and offering trails for multiple use types (e.g., bike, horse, or hiking).
- Opposed to allowing campfires for overnight campers due to wildfire risk. If campfires are allowed, the RMPA/EA should comprehensively analyze potential impacts and articulated in a preferred alternative.

**I. Hunting**

Supervisor Coonerty expressed opposition to allowing hunting on the C-CD property due to concerns with public safety, wildlife. He stated that if hunting is allowed, the RMPA/EA should comprehensively analyze potential impacts and articulated in a preferred alternative.

## County of San Mateo Parks Department

---

[AG-COUNTY-SMPD]

**A. Trail Network**

San Mateo County Parks indicated the C-CD National Monument has the opportunity to become part of a regional trail network. The agency shared specific nearby efforts (e.g., Ohlone-Portola Heritage Trail and the California Coastal Trail).

## United States House of Representatives

---

[AG-US\_HR]

**A. Comment Period Extension**

Members of Congress Anna Eshoo and Jimmy Panetta requested an additional 30 days be added to the comment period.

## 3.2. ORGANIZATION COMMENTS

The table below lists the organizations that provided written comments on the Draft RMPA/EA.

**Table 3.2.1 Commenting Organization List**

Comment Code	From	Commenter
<a href="#">ORG-AMLT</a>	Amah Mutsun Land Trust	Rick Flores
<a href="#">ORG-CAMTB</a>	California Mountain Biking Coalition	Austin McInerny
<a href="#">ORG-CC</a>	Clean Coalition	Sahm W.
<a href="#">ORG-CCOF</a>	California Certified Organic Farmers	Jane Sooby
<a href="#">ORG-CLF</a>	Conservation Lands Foundation	Danielle Murray
<a href="#">ORG-CNPS-SC</a>	California Native Plant Society, Santa Cruz Chapter	Linda Brodman
<a href="#">ORG-DF</a>	Defenders of Wildlife	Andrew Johnson
<a href="#">ORG-DNCA</a>	Davenport North Coast Association	Noel Bock
<a href="#">ORG-FOJ</a>	Friends of Juristac	Greg SeaLion Cotton
<a href="#">ORG-FONC</a>	Friend of the North Coast	Michael Lozeau
<a href="#">ORG-GRWMB</a>	Girls Rock Women's Mountain Biking	Alexis Morgan
<a href="#">ORG-MBOSC</a>	Mountain Bikers of Santa Cruz	Matt De Young
<a href="#">ORG-MLF</a>	Mountain Lion Foundation	Debra Chase
<a href="#">ORG-PLC</a>	Public Lands Conservancy	Tom Baty
<a href="#">ORG-POST</a>	Peninsula Open Space Trust	Walter Moore
<a href="#">ORG-RBDA</a>	Rural Bonny Doon Association	Ted Benhari
<a href="#">ORG-RMRHOA</a>	Redwood Meadows Ranch Homeowners Association	Pamela Koch
<a href="#">ORG-SALC</a>	San Andreas Land Conservancy	David Kossack
<a href="#">ORG-SASS</a>	Safe Ag Safe Schools	Hektor Calderon Edward Rehanek
<a href="#">ORG-SBIS</a>	South Bay Indigenous Solidarity	Membership
<a href="#">ORG-SC_CAN</a>	Santa Cruz Climate Action Network	Pauline Seales
<a href="#">ORG-SCC-HA</a>	Santa Cruz County Horseman's Association	Debbie Boscoe
<a href="#">ORG-SCCFB</a>	Santa Cruz County Farm Bureau	Brendan Miele
<a href="#">ORG-SDMBA</a>	San Diego Mountain Bikers Association	Susie Murphy
<a href="#">ORG-SF</a>	Sempervirens Fund	Sara Barth
<a href="#">ORG-SRL</a>	Save the Redwoods League	Anthony Castaños
<a href="#">ORG-USHPA</a>	US Hanggliding and Paragliding Association	Jugdeep Aggarwal

### Amah Mutsun Land Trust

[ORG-AMLT]

#### A. RMPA/EA Planning Process

AMLT indicated it was pleased to find that overall the issues in AMLT's scoping report comments were addressed in the Draft RMPA/EA related to protecting and preserving tribal access to ancestral land and resources.

**B. Cultural and Historic Resources**

AMLT conveyed satisfaction that the RMPA recognizes: a) the need to protect natural and cultural resources, b) active approaches to land stewardship practices, c) Resource Management Zone 4 will be managed for traditional cultural property values in collaboration with AMLT, and d) that through the 2016 Memorandum of Understanding with AMLT, traditional ceremonies and cultural practices of the Amah Mutsun Tribal Band, traditional ecological knowledge and traditional resource and environmental management practices, resource gathering, and education and interpretation will be fostered on the property.

**C. Grazing**

AMLT requested that the BLM evaluate the effects of cattle access on habitat quality (including water quality), particularly sensitive habitats like seeps, springs, and wetlands.

**D. Trails and Access Points**

Due to the sensitive riparian habitat and special status species present at Lower Liddell Creek, AMLT expressed concerns that public access could degrade the habitat quality (i.e., opposed the proposed parking lot and trails in Alternative A and the trail system located in Lower Liddell Creek in Alternative C; supported Alternative B which omits parking and trails from Lower Liddell Creek Watershed).

**E. Recreation**

Due to the large and heavy nature of horses and the erosion they can cause to trails, AMLT requested that the BLM limit the number of horses allowed on the trails.

**F. Hunting**

AMLT indicated it opposes hunting on the property except for cases where land managers are working to eradicate invasive species (e.g., feral pigs).

## California Mountain Biking Coalition

[ORG-CAMTB]

**A. General Planning, Management, and Coordination**

The California Mountain Biking Coalition (CAMTB) encouraged the BLM to consult and coordinate with local/ experienced stakeholders, including neighboring property owners, land managers, communities, agencies, NGOs, etc. during planning phases (e.g., trail design) and management implementation (e.g., volunteer patrols).

CAMTB suggested specific strategies to help expand and sustain the BLM's management capacity, including:

- **Parking Fees.** Charging for parking (including offering annual parking passes) as a means to establish a sustainable funding source for property management.
- **Volunteer Patrol.** Establishing a volunteer backcountry patrol to augment the BLM's ability to provide public safety and protect sensitive resources.

**B. Lands and Realty**

[Similar comments to [FORM A-MTB](#) related to acquisition and easements.]

### C. Access and Trails

CAMTB stated that trail design should prioritize maximizing access for all trail users and mitigating trail conflict potential, using today's best practices (e.g., BLM's Guidelines For A Quality User Experience, ADA accessible pathways, and educational opportunities on trails). MBOSC supported trail connectivity, including between east and west ends of the property and with neighboring properties (e.g., Rail Trail). However, MBOSC shared concerns about trails allowing a specific use(s) intersecting with a trail(s) that conflicts with that said use(s) (e.g., multi-use trail intersecting with restricted use).

[Similar comments to [FORM\\_A-MTB](#) related to total trail access, trail connections, and trail design.]

### D. Recreation

[Similar comments to [Form\\_A-MTB](#) mountain bike directional trails, special use permits, and e-bikes.]

In addition to the similar comments in FORM\_A-MTB, CAMTB specified that allowing Class I e-bikes into national trail network seems to be an emergent and logical policy trend.

## Clean Coalition

[ORG-CC]

### A. Grazing

The Clean Coalition expressed support for minimizing grazing activities (e.g., Alternative A).

### B. Transportation and Access

The Clean Coalition indicated support for access and transportation that maximizes foot access onto the property and could be served by public transit (reducing the need for parking developments).

## California Certified Organic Farmers

[ORG-CCOF]

### A. Vegetation Management

The California Certified Organic Farmers expressed general support for a comprehensive weed management plan. The organization requested more details and commitment to use an integrated pest management approach (e.g., grazing, prescribed fire, ecological succession, biological controls, etc.).

The California Certified Organic Farmers shared concerns about the proposed herbicide activities, particularly herbicide drift or transport from aerial applications that can compromise neighboring organic farm operations.

The organization recommended specific methods and restrictions for applying herbicides and pesticides, including no helicopter application of Aminopyralid and Clopyralid or any synthetic herbicide or pesticide, and implement notification procedures for neighboring farms and ranches.

## Conservation Lands Foundation

---

[ORG-CLF]

### A. RMPA/EA and NEPA Process

The Conservation Lands Foundation (CLF) stated several statutes, policies, and legal requirements (e.g., Presidential Proclamation; Omnibus Public Lands Act; and BLM policies including Secretarial Order 3308, 2011 15-Year Strategic Plan, and policy manuals 6100 and 6220) dictate the property should be managed in a way that prioritizes conservation of its ecological, archeological, and cultural values over other uses, including recreation, within the National Conservation Lands.

CLF conveyed that the RMPA/EA overall lacked information to adequately analyze impacts of the proposed uses, particularly without a defined preferred alternative, and failed to foster informed decision-making and informed public participation.

CLF also requested the BLM extend the comment period until after the COVID-19 national emergency declaration is revoked.

### B. General Planning, Management, and Coordination

CLF expressed concerns that the BLM will lack the capacity to manage a new expansive trail system (e.g., high trail mileage described in Alternative C). The organization supported the BLM's phased approach to constructing trails to monitor for impacts and apply adaptive management as needed.

### C. Grazing

CLF shared concerns about grazing impacts (e.g., soil erosion) on sensitive habitat and wildlife. CLF recommended limited to no expansion of grazing activities.

### D. Access Points

CLF recommended the BLM limit or prohibit development at the lower Liddell Creek area.

### E. Recreation

CLF identified concerns with specific recreational activities, including:

- **Camping.** Prohibit off-trail or dispersed camping
- **E-bikes.** Prohibit e-bikes
- **Horses.** Limit or prohibit equestrian use to reduce habitat impacts

### F. Hunting

CLF recommended the BLM prohibit hunting on the property due to the small size of the property posing safety concerns to recreationists and local residents.

## California Native Plant Society, Santa Cruz Chapter

---

[ORG-CNPS-SC]

### A. General Management and Planning

The Santa Cruz Chapter of the California Native Plant Society expressed support for Alternative A and recommended the BLM develop and implement a grazing program. The organization stated that these two management approaches offer the greatest protection and preservation of natural resources and wildlife. The organization expressed support for the BLM applying adaptive

management (e.g., using land use plans with specific, measurable goals, and outcomes to evaluate and modify to realize desired outcomes) for long-term stewardship of the property.

## Defenders of Wildlife

[ORG-DF]

### A. RMPA/EA and NEPA Process

Defenders of Wildlife (Defenders) conveyed that the RMPA/EA overall lacked information to adequately analyze impacts of the proposed uses. Defenders stated the proposed development and public activities appear to be contrary to the California Coastal National Monument Boundary Enlargement proclamation. Defenders called for the BLM to prioritize resource values over increased public access.

### B. General Planning and Management

Defenders stated it supports a blending of lower-impact options for human access and long-term maintenance of the property (e.g., non-native/invasive species removal, habitat restoration, and wildlife mitigation). Defenders indicated opposition to the scope and scale of development in Alternative C, because it could cause overuse of the property and substantial wildlife disturbance.

Defenders shared concerns about long-term BLM capacity and requested the BLM provide more specific information about how BLM plans to obtain funding and resources to ensure management sustainability (e.g., trash services, facilities maintenance, enforcement, etc.). Defenders was particularly that Alternatives B and C would require constant management beyond the BLM's capacity. The organization expressed support for a phased approach for RMPA implementation with associated monitoring.

### C. Recreation

Defenders state the level of public access and allowable activities described in Alternatives B and C would lead to multiple negative impacts to resources (habitat, wildlife, and cultural sites) and user/community conflicts, including public safety. Defenders expressed concerns that allowing camping and off-leash dogs, even with tight regulation, could further threaten wildlife, increase risks to safety, and create concern within local communities.

### D. Hunting

Defenders indicated opposition to hunting given the risks to habitat, wildlife, and human safety.

## Davenport North Coast Association

[ORG-DNCA]

### A. RMPA/EA and CCNM

The Davenport North Coast Association (DNCA) conveyed that the RMPA/EA overall lacked information to adequately analyze impacts of the proposed uses, including a Preferred Alternative. Given the lack of available information, DNCA expressed concerns about adequate projections and planning/mitigating accordingly. DNCA called for the BLM to either conduct an EIS or revise the EA to include sufficient, comprehensive analyses and documentation to justify EA conclusions. DNCA identified specific examples in the RMPA/EA where information about potential impacts appeared lacking (e.g., climate change impacts under the conditions in the alternatives, detailed characterization of Monument resources, and alignment with existing plans and policies).



DNCA questioned how the proposed access and recreation activities align with the 2005 CCNM RMP goals (which does not mention public access or recreation), and if/what protections the National Conservation Lands designation affords C-CD over and above the protection of the rest of the CCNM or other BLM lands.

DNCA supported designating San Vicente, Liddell, and Laguna Creeks as Wild and Scenic Rivers as described in Alternatives B and C. DNCA indicated that such a designation is another reason to pursue an EIS.

DNCA stated the RMPA/EA did not adequately consider cumulative and synergistic impacts of the new public access activities nor adequately provide design considerations for mitigation. DNCA expressed concerns that the RMPA/EA did not quantify impacts due to lack of visitation use data and made unsupported assertions that certain effects were “negligible.” DNCA suggested several considerations, including public access impacts (on habitat, sensitive species, water resources, neighboring communities, neighboring private and public properties, and non-federal public safety services), climate change impacts, and defining baselines for evaluating impacts. Additionally, DNCA stated that ascertaining merits and drawbacks of the alternatives is difficult without a separate analysis for each alternative. DNCA called for the BLM to work around information gap challenges, describing how and when the BLM will address these information gaps.

#### **B. Management, Planning, and Coordination**

Given the mixed property ownership in the area, multiple policies and planning efforts, and opportunity to leverage resources, DNCA encouraged the BLM to establish a coordination framework with adjacent property owners and related management entities. DNCA offered specific approaches and considerations (e.g., Interagency Ecosystem Management Task Force [IEMTF] principles, specific coordination partners, and a notification process about RMPA implementation).

DNCA identified various planning efforts that the BLM should incorporate into the RMPA/EA, such as the Santa Cruz Coastal Reuse Plan for the CEMEX property and trail plans in the region. The CEMEX plan should be considered as Reasonably Foreseeable Future Action in the cumulative impacts analysis.

#### **C. Lands and Realty**

DNCA stated that it concurs with Santa Cruz County’s comment regarding opposition to acquisition of additional adjacent properties.

#### **D. Water**

DNCA shared concerns that public access water use on the property will reduce water available to neighboring communities and for supporting habitat and wildlife. DNCA stated the RMPA/EA does not adequately analyze and address future water supply concerns.

#### **E. Habitat and Wildlife**

DNCA expressed overall support for protecting natural plant and wildlife species and specific conservation provisions outlined in the Presidential Proclamation. For instance, DNCA

recommended the BLM adopt management actions for restoring naturally functioning riparian systems (in Alternatives B and C) and habitat restoration for special status species.

**F. Emergency Services, Fire, and Security**

DNCA recommended the RMPA/EA provide quantitative analyses of impacts on emergency services (e.g., fire readiness) and private property security on neighboring communities and properties, and provide mitigation actions. DNCA stated that while these may be administrative actions that do not fall under the purview of “planning activities,” local communities need a better understanding of these issues and proposed activities to address their concerns.

DNCA stated that fire risk prevention and protection is a top public safety priority. DNCA identified the wildland urban interface (WUI) areas as a major concern for communities and wildfire risk. DNCA said that the rural roads in the area (i.e., Warrenella Road and Bonny Doon Road) are not wide enough to serve as adequate fire breaks or allow access for suppression.

**G. Vegetation Management**

DNCA recommended using multiple vegetation management strategies to manage invasive species, reduce erosion, and minimize fire risk.

DNCA stated that herbicide use should be minimized and only used where necessary (e.g., enable other methods like mechanical removal, grazing and controlled burn to be more effective).

**H. Agriculture and Grazing**

DNCA stated that the RMPA/EA did not adequately analyze and offer mitigation measures for public access impacts on local agriculture operations near the property, including cumulative and synergistic impacts on neighboring agricultural operations.

DNCA expressed concerns about grazing activities impacting sensitive habitat and wildlife. DNCA supported grazing mitigation measures outlined in Alternatives B and C (e.g., fencing off springs and riparian areas).

**I. Transportation, Parking, and Access**

DNCA called for overall more information and quantitative analyses of the transportation system that evaluates local, off-property traffic and parking impacts, including the environmental consequences (e.g., air quality) of traffic degradation, and cumulative analysis including other foreseen actions. The final RMPA must provide for adequate mitigating measures coordinated with pertinent agencies.

DNCA was concerned that charging visitor use fees would lead to off-site parking. DNCA stated it would not support visitor use fees unless there was a multi-agency cooperation and enforcement plan to minimize public safety risks.

DNCA identified concerns and opposition with several of the proposed access points and parking options. DNCA stated the BLM should adequately analyze and address these traffic and safety concerns if these areas are included in the final RMPA/EA:

- **Swanton Road.** Potential impacts on Cal Fire responsiveness as the Big Creek Fire Station is on the same road.
- **Warrenella Road.** Narrow, steep, and tight curves in portions of the road could be dangerous and not suitable for RVs.
- **Bonny Doon Road.** Potentially dangerous road conditions (e.g., too narrow).
- **Cement Plant Road.** Poor road conditions, traffic accidents, and small community nearby.

DNCA proposed that the BLM consider the future redeveloped CEMEX site as an alternative to the Cement Plan Road access.

DNCA expressed concerns about potential crowding despite spreading visitor access and usage.

#### J. Recreation

DNCA in general supported mixed recreational use of trails by hikers, mountain bikers, and equestrians. DNCA identified specific uses or use limitations it did or did not support:

- Support segregation of hikers, bikers, and equestrians into different areas (although DNCA had concerns about how this will be enforced).
- Support closing bike and equestrian trails during wet periods to limit erosion and trail failure.
- Potential support for e-bikes (DNCA had monitoring and enforcement concerns given that San Vicente Redwoods does not allow e-bikes). Support for Class I e-bikes, but not Class II.
- Opposed to allowing camping due to wildfire risk and lack of site-specific information and analyses of impacts.
- Opposed to off-leash areas for dogs. DNCA had leash requirement enforcement concerns.

#### K. Hunting

DNCA expressed opposition to allowing hunting on any part of the property for any kind of game (with the exception for state/federal-directed management of invasive species) due to safety and wildlife impact concerns.

DNCA stated that the BLM should not enhance natural populations of deer, quail, or turkey through hunting.

#### L. Visual Resources

DNCA recommended including mitigation measures for visual impacts and using VRM Class II objectives over Class III to retain the landscape character. DNCA also recommended considering visual impacts from different vantage points (e.g., upper marine terraces).

#### M. Facilities Management

DNCA supported the daily garbage services and closed containers described in Appendix D and recommended adding these to Fish and Wildlife Management Actions. DNCA requested more information and mitigation measures to address concerns with other types of disposal and cleaning needs (e.g., abandoned cars, restroom cleaning/maintenance, and graffiti).

## **N. DNCA Proposed Preferred Alternative**

The DNCA offered its preferred alternative, which was a hybrid “Northgate-Southgate” parking and trailhead concept to serve the northern section of the property directly off Highway 1. DNCA articulated that its preferred alternative was designed to meet several goals, including safe and adequate public access, mixed recreational use, protection of sensitive habitats, promotion of public safety and minimizing conflicts, assuming full protection of “objects” described in Proclamation 9563, fire risk prevention/ protection, future connectivity with San Vicente Redwoods, accommodation of Santa Cruz Coastal Reuse Plan, and eliminating/mitigating conflicts between local community and visitors. The DNCA preferred alternative included concepts summarized below, assuming adequate NEPA compliant analyses of all potential impacts occur:

- Adoption of the “Southgate” access and trail system for Recreation Management Zone 3, and addition of a “Northgate” parking/restroom/trailhead accessed directly from Highway 1 at mile 30.22
- Working with CalTrans to ensure adequate ingress and egress at a Southgate parking/restroom/trailhead and “Northgate” public trailhead facilities
- Implementation of improvements in two phases, with development of the Southgate access as Phase One and the Northgate access as Phase Two
- Eliminate the controversial proposed parking and trailheads at Swanton Road past Molino Creek, Warrenella Road Gate, and Warrenella Road “Top”
- Reducing the number of trailheads while still accommodating the maximum miles of trails in the future
- Future trail connectivity with the adjacent San Vicente Redwoods property from the Northgate trailhead; and future trail connectivity with the North Coast Rail Trail
- Northern sector trails located away from Warrenella Road and west of Agua Puerca Creek
- Provide mountain bike specific-directional descending trails and avoid the re-use of steep fire roads as trails, as they contribute disproportionately to erosion and injuries
- Guided tours, education, and research in RMZs 2 and 4
- Future North-South connectivity across the Cotoni-Coast Dairies National Monument following the conclusion of reclamation activities in RMZ 2; future connectivity from the “Northgate” trailhead to the future redeveloped CEMEX site with its visitor services and interpretive center, as well as the terminus of the North Coast Rail Trail
- Establish safe connectivity to the North Coast Rail Trail using a pedestrian/bicycle overpass over Route 1
- DNCA generally supports the recommendations of the Mountain Bikers of Santa Cruz’s “Official Position on the Draft Resource Management Plan for Cotoni-Cast Dairies” and particularly points 8-17, which include principles for the design and implementation of a multi-use trail system

## **Friends of Juristac**

[ORG-FOJ]

### **A. Cultural and Historic Resources**

Friends of Juristac encouraged the BLM to continue engaging the indigenous people (e.g., Amah Mutsun Tribal Band).

## Friends of the North Coast

---

[ORG-FONC]

### A. RMPA/EA

The Friends of the North Coast (FONC) identified RMPA/EA proposed activities that appeared inconsistent with regulations, policies, and restrictions (e.g., FLPMA, Presidential Proclamation 9563, National Landscape Conservation System, C-CD property deed restrictions, California Coastal Act, and Coastal Development Permit 3-11-025). For instance, FONC indicated that prioritizing recreational activities over the Monument's natural, cultural and biological resources is contrary to the Presidential Proclamation 9563. FONC also stated the proposed trails and uses are inconsistent with Secretarial Order 3308, because they fail to manage the monument as an integral part of the larger, surrounding landscape.

FONC conveyed that the RMPA/EA overall lacked information to adequately analyze impacts of the proposed uses and failed to foster informed decision-making and informed public participation. FONC identified specific examples where it viewed the EA as inadequate pursuant to NEPA (e.g., lacking a No Project Alternative and a proposed action, using inadequate baselines to evaluate impacts on resources and protected "objects," and deferring analysis of impacts of proposed management uses). FONC stated that Alternative A does not qualify as a "No Project" alternative, as it does not reflect current ongoing management of the Monument.

FONC included detailed information from subject-matter experts that further elaborated on issues that FONC recommended the BLM further analyze and address in an EIS (e.g., wildlife populations, special status species, biotic communities, sedimentation and erosion, noise impacts, cascading impacts of visitor use, agricultural operations, and herbicides). FONC articulated that due to the lack of information/analyses and proposed activities that may be inconsistent with existing policies and regulations, the draft RMPA/EA alternatives may significantly degrade the Monument and objects under Proclamation 9563 protection. Therefore, FONC called for the BLM to conduct an EIS to proceed with a management plan.

### B. Agriculture and Grazing

FONC expressed concerns that the RMPA/EA does not adequately protect and preserve agricultural and grazing operations aligned with the intent of the Coastal Development Permit and deed restrictions. FONC indicated the EA did not adequately describe the value of agriculture and grazing (e.g., habitat connectivity and fire-prone vegetation reduction). FONC called for more analyses on how the proposed activities and uses may affect adjoining and nearby agricultural operations.

### C. Vegetation Management and Herbicides

FONC stated the BLM's weed management strategy should emphasize working with natural ecological succession processes to foster establishment of more desirable species (e.g., sowing native plants in addition to weed removal and using insects as biological control options). FONC stated the RMPA should demonstrate BLM's commitment to using an integrated pest management (IPM) approach.

FONC expressed specific concerns about herbicide applications (particularly aerial spraying) that could affect nearby organic agricultural operations. Herbicides could also enter the water and be carried off-site, affecting agriculture, wildlife, etc. FONC indicated aerial herbicide applications

should be prohibited, and that herbicides applications should be used as a last resort in managing non-native weeds and that cultural methods should be prioritized over using synthetic pesticides.

#### **D. Habitat, Plants, Wildlife, and Special Status Species**

FONC stated components of the alternatives appear inconsistent with the California Coastal Act – many of the uses, trails, parking, etc. would disrupt environmentally sensitive habitat areas and these features do not appear to depend on threatened species and rare habitats.

FONC indicated the RMPA/EA did not set adequate baselines to assess watershed impacts to wildlife, plants, biotic communities, and wetlands (e.g., lack of species-specific wildlife surveys, missing sensitive plant species, and incomplete mapping of biological communities and wetlands/waterways). FONC called for baselines and additional analyses on a number of habitat and wildlife issues to evaluate impacts and implement adaptive management. These include impacts on the watershed/landscape as a whole, biotic communities and plant species, coastal zone wetlands, and corvids (e.g., crows) impacting endangered marbled murrelet. FONC called for more analyses particularly related to trails, parking, and associated visitors – analyze their impacts on special status species' habitat, and other wildlife habitat and movement.

#### **E. Water**

FONC commented the need for adequate baselines for analyzing impacts to water resources and the watershed. FONC raised specific concerns related to public access and use impacting water quality (e.g., sedimentation, erosion, and turbidity) needed for salmonid habitat.

#### **F. Access Points, Trails, and Parking**

FONC articulated concerns with several of the proposed access points, parking, and trail alignments, including:

- **Warrenella Top and Warrenella Road Gate.** Potentially impact biotic communities and plant species protected as “objects of the Monument.”
- **Bonny Doon Road.** Sensitive wetland and riparian habitat in the area.
- **Liddell Creek.** Sensitive wetland and riparian habitat in the area.
- **Molino Creek Gate.** Sensitive wetland and riparian habitat in the area.
- **Marina Ranch Gate.** Sensitive wetland and riparian habitat in the area.
- **Swanton Road Gate.** Safety concerns.
- **Cement Plant Road.** Safety concerns.

FONC recommend BLM consider a different access point at Mile Marker 30.22 as an alternative to Swanton and Cement Plant Roads.

#### **G. Recreation**

FONC commented the RMPA/EA did not sufficiently analyze recreational impacts, in part due to lack of information on proposed trails, parking, visitor numbers, uses, etc. and inadequate baselines. Therefore, an EIS is warranted.

FONC identified a number of activities that warrant further analyses and managed appropriately, including:

- **Bikes/e-Bikes.** Further analyze bike and e-bike impacts, particularly on habitat that wildlife currently use or move through those areas. FONC also said e-bikes should be considered a



motorized vehicle, and therefore prohibited according to the property deed restrictions and Presidential Proclamation 9563, superseding conflicting policies like Secretarial Order 3376.

- **Dogs.** Further analyze impacts dogs may have on habitat and wildlife, particularly habitat for special status species like the red-legged frogs. FONC expressed concerns about allowing dogs, on or off leash.

FONC presented its proposed alternative, which recommended activities that should be allowed, limited, or prohibited (e.g., no hunting, camping, or fire-making).

#### **H. Hunting**

FONC stated the RMPA/EA did not provide sufficient information or analyses on hunting impacts and identified several concerns including safety, habitat degradation, noise disturbance, and affected wildlife. FONC expressed support for San Vicente Redwood's hunting prohibition and opposed hunting on any portion of the property.

#### **I. Noise**

FONC called for setting baselines for existing noise conditions to adequately evaluate potential noise impacts of the various proposed facilities and uses. FONC expressed concerns that additional noise (e.g., from construction, dogs, hunting, crowds, etc.) could disturb both wildlife and neighboring communities.

#### **J. FONC Proposed Preferred Alternative**

FONC stated that the BLM should include an alternative that avoids most or all of the significant impacts raised in FONC's comments and recommended the BLM select FONC's alternative as the proposed action. FONC indicated the BLM should prepare an EIS addressing the concerns and issues raised in FONC's comments, identify a proposed action, and compare potential impacts with the proposed action and other alternatives. FONC offered detailed information and resources, including maps and other visuals. Several provisions were also derived from the San Vicente Redwoods Public Access Plan. Major components of FONC's preferred alternative are summarized below by topic:

##### **General Management**

- Management as unit of National Landscape Conservation System
- Compliance with California Coastal Act, 2012 Coastal Development Permit 3-11-035, and Deed Restrictions
- Access and usage not to exceed sufficiency of funding and personnel to fully implement, monitor, and enforce compliance with the RMPA.

##### **Analyses and Monitoring**

- Recognition that direct human impact on C-CD has been minimal for many decades
- Update of the existing conditions report
- Initial survey of biological resources.
- Conduct monitoring (biological and social variables, condition of access features, etc.) to inform adaptive management
- Publish science plan

##### **Services**

- Amenities and services to fully cover the 4 Ts = Traffic, Trauma (police, fire, and rescue needed), Toilets, and Trash

#### **Agriculture/Grazing**

- Management consistent with the protection and preservation of adjacent sustainable agricultural uses

#### **Cultural and Historic Resources**

- Management consistent with BLM's MOU with the Amah Mutsun.

#### **Habitat and Wildlife**

- Implement similar habitat and wildlife provisions outlined in the San Vicente Redwoods Public Access Plan (e.g., minimize access impacts to sensitive resources; monitor access features to inform adaptive management) and include additional standards (e.g., certain wetland delineation methods and thresholds for impacts on habitat and wildlife).
- Compliance with the recovery plans for the endangered Red-Legged Frog, Central California Coast Coho Salmon, and South-Central California Steelhead.

#### **Vegetation Management**

- Conduct targeted and prioritized weed control strategies
- Preclusion of aerial herbicide application

**Recreation - Phased Implementation** - Phases proceed upon demonstrated management success of the previous phase(s) with adequate transparency (e.g., independent monitoring and evaluation and publicly available reports)

- Phase 1: RMZ 3 - Access at Yellow Bank Creek; connectivity to the North Coast Rail-Trail; a pedestrian/bicycle overpass over State Highway One. Allowable activities include hiking and horseback only at Yellow Bank South and Cotoni Trail; hiking, biking, and horseback on Bonny Doon Loops and Yellow Bank North trails.
- Phase 2: RMZ 1 - Access via new Access Road at Mile Marker 30.22. No access to or over Warrenella Road/Gate or Swanton Road.
- Phase 3: RMZ 1- Potentially connect to San Vicente Redwoods trails.
- RMZ 2 and 4 - No access, use, or development allowed.

#### **Recreation – Allowable Activities and Public Access Management**

- Prohibited activities include: fire making, smoking, collecting, hunting or habitat manipulation, fishing, off-leash dogs, motorized dirt biking (including e-bikes), unauthorized trail building, rock climbing/rappelling, camping, and commercial uses.
- Implementation of a visitor registration system and special use permit system (with a maximum threshold of annual visitors).

## **Girls Rock Women's Mountain Biking**

[ORG-GRWMB]

### **A. General Planning, Management, and Coordination**

The Girls Rock Women's Mountain Biking (Girls Rock) indicated opportunities for collaboration as communities of mountain bikers and non-bikers are ready and willing to support trail stewardship.

### **B. Access, Trails, and Recreation**

Girls Rock stated its interest in more biking access and opportunities and the organization's strong support for a responsibly built, sustainable trail system.

## Mountain Bikers of Santa Cruz

[ORG-MBOSC]

### A. General Planning, Management, and Coordination

The Mountain Bikes of Santa Cruz (MBOSC) frequently encouraged the BLM to collaborate with stakeholders, including neighboring property owners, land managers, communities, agencies, NGOs, and other local experts during planning phases (e.g., trail design) and management implementation (e.g., volunteer patrols). MBOSC indicated that partnerships will reduce BLM management and implementation costs as well as encourage public stewardship.

MBOSC suggested specific strategies to help expand and sustain the BLM's management capacity, including:

- **Parking Fees.** Charging for parking (including offering annual parking passes) as a means to establish a sustainable funding source for property management.
- **Volunteer Patrol.** Establishing a volunteer backcountry patrol to augment the BLM's ability to provide public safety and protect sensitive resources.

### B. Lands and Realty

[Similar comment to [FORM\\_A-MTB](#) related to acquisition and easements.]

MBOSC suggested specific partnership opportunities (e.g., Trust for Public Lands). The organization stated that these acquisitions/easements enable greater flexibility to develop sustainable and logical trail arrangements, including alleviate impacts to specific areas of concern (e.g., Hwy 1, Swanton Rd, Cement Plant Rd, and Davenport).

### C. Facilities Management

MBOSC suggested several parking facility amenities and services, including parking lots large enough to prevent overflow on local roads, bathroom, trash receptacles, regular bathroom and trash services, horse trailer parking with adequate staging space, seating/shade structures, and signage. The organization specifically indicated the four trailer parking spaces as proposed in the RMPA is inadequate.

### D. Trails and Access Points

[Similar comments to [Form\\_A-MTB](#) related to total trail access, trail connection to San Vicente Redwoods, specific trail design at Bonny Doon Road, and trail connection to Rail Trail.]

MBOSC stated that trail design should prioritize maximizing access for all trail users and mitigating trail conflict potential, using today's best practices (e.g., BLM's Guidelines For A Quality User Experience, ADA accessible pathways, and educational opportunities on trails). MBOSC supported trail connectivity, including between east and west ends of the property and with neighboring properties (e.g., Rail Trail). However, MBOSC shared concerns about trails allowing a specific use(s) intersecting with a trail(s) that conflicts with that said use(s) (e.g., multi-use trail intersecting with restricted use).

MBOSC proposed specific access point alternatives:

- On the Trust for Public Lands property at Hwy 1 and Swanton Road
- Between Cement Plant and Swanton Roads (defined as "Northgate parking" by DNCA)

- MBOSC recommended the BLM create a trail alternative to Warrenella Road (including the connection from Molino Creek to Warrenella trailhead) due to safety concerns.

In addition to the trail design recommendations similarly stated in FORM\_A-MTB, MBOSC proposed specific trail designs, including stacked loop trails south of Molino Creek, extended loop trails between Liddell and Yellow Bank Creeks, rerouted trail through the southern end of Sempervirens Fund's property, and modified trail from the second terrace to Molino Creek.

#### **E. Recreation**

[Similar comments to Form\_A-MTB related multi-user activities, mountain bike directional trails, special use permits, and e-bikes.]

In addition to the similar comments in FORM\_A-MTB, MBOSC proposed specific trail management tools for bikes, including designating multi-use trails as directional where appropriate and specifying that allowing Class I e-bikes is consistent with other parks that permit e-bikes locally.

### **Mountain Lion Foundation**

[ORG-MLF]

#### **A. Hunting**

The Mountain Lion Foundation stated it opposed permitting hunting as described in the draft RMPA/EA due to potential impacts on mountain lions (e.g., by calling game species like turkeys, hunters may inadvertently lure mountain lions) and increased risk of human-mountain lion conflict. At a minimum, adequate signage should be provided that informs recreationists and hunters how to avoid conflicts with mountain lions and what to do if there is an encounter.

### **Public Lands Conservancy**

[ORG-PLC]

#### **A. General Planning, Management, and Coordination**

The Public Lands Conservancy (PLC) expressed its support for the BLM to coordinate planning and management activities with numerous jurisdictions on and adjacent to the CCNM. PLC also conveyed support and encouragement for the BLM to conduct and continue inventory and monitoring programs that ensure the long-term health of the area.

#### **B. Grazing**

PLC expressed support for the minimal levels of grazing described in Alternative A. PLC recommended no expansion of grazing activities and to phase grazing out where appropriate due to resources concerns (e.g., water quality and endangered species).

#### **C. Fire and Fuels**

PLC stated its support for the BLM to reduce risks of catastrophic wildfire through a Wildland Fire Management Plan (e.g., use of fuel breaks). PLC specifically expressed support for prescribed burning, which provides both public safety and ecological health.

**D. Vegetation Management**

PLC conveyed general support for a comprehensive Weed Management Plan (similar to the approach described in Alternatives B and C) to combat invasive plant species. However, PLC stated its opposition to aerial/broadcast spraying of herbicides or pesticides.

**E. Habitat and Wildlife**

PLC encouraged the BLM to implement ecological restoration of any degraded areas.

**F. Access and Trails**

PLC stated its support for connecting C-CD trails with other properties, including with San Vicente Redwoods and the proposed Rail Trail.

**G. Recreation**

PLC expressed specific concerns with off-trail activities due to risks of harming resources (e.g., sensitive plant species and cultural resources), particularly when the BLM does not currently have comprehensive inventories of these resources on the property. Therefore, the organization stated it opposed off-trail hiking and dispersed camping.

**H. Hunting**

PLC conveyed its opposition to allowing recreational hunting and any habitat or wildlife enhancements for the purposes of promoting hunting. PLC said these activities are inconsistent with adjacent land uses and pose too high of a risk to wildlife, habitat, and public safety.

## Peninsula Open Space Trust

---

[ORG-POST]

**A. RMPA/EA and NEPA**

The Peninsula Open Space Trust (POST) encouraged the BLM to investigate designating the San Vicente and other creeks as Wild and Scenic Rivers that will offer greater protections and help support recovery of native fish species and other aquatic species

**B. General Planning, Management, and Coordination**

POST called for the BLM to ensure an appropriate balance between recreation and resource protection by providing safe and sustainable opportunities for public recreation that make appropriate use of existing infrastructure, protect natural and cultural resources, and compliment neighboring and regional recreational resources.

**C. Grazing**

POST recommended specific strategies to reduce grazing impacts on wildlife and habitat (e.g., wildlife-friendly fencing, water management infrastructure, and managed cattle stocking levels).

**D. Fire and Fuels**

POST urged the BLM to prioritize and actively use natural land management tools to prevent catastrophic wildfires (e.g., reduce fuel loads).

#### E. Vegetation Management

POST indicated that selective use of herbicides for managing invasive species is an important management tool, but should be applied in a measured way and not through broadcast spraying.

#### F. Habitat and Wildlife

POST stated that the BLM should prioritize biodiversity conservation and threatened species recovery in all management actions and implementation decisions (e.g., protect core habitat and habitat connectivity). POST said it supported the creation of core fish and wildlife protection areas that will help ensure biodiversity conservation goals can be achieved more effectively and efficiently. POST questioned whether the RMZ boundaries align with these conservation goals.

#### G. Trails and Access

POST offered specific trail and access recommendations, including:

- **Warrenella Road.** Use only for property management and emergency services, not recreation
- **San Vicente Redwoods.** Design trail system to connect to SVR's trail system.
- **Quarry.** Design trails away from the quarry on San Vicente Redwoods property due to potential safety risks.

#### H. Recreation

POST identified conditions under which certain recreational activities can be allowed and balanced with natural and cultural resource conservation goals:

- **Trails.** In general, keep recreational activities to designated trails to avoid spread of invasive plants.
- **Camping.** Allow only in designated camp sites; consider seasonal camping to avoid dry and windy times of the year (i.e., higher fire risk conditions).
- **Campfire.** Prohibit campfires due to risk of unintentional ignitions.
- **Dogs.** Keep dogs on leash and not allowed in sensitive habitats.

### Rural Bonny Doon Association

[ORG-RBDA]

#### A. RMPA/EA and CCNM

The Rural Boon Doon Association (RBDA) identified RMPA/EA proposed activities that appeared inconsistent with regulations, policies, and restrictions (e.g., FLPMA, Presidential Proclamation 9563, National Landscape Conservation System, C-CD property deed restrictions, California Coastal Act, and Coastal Development Permit 3-11-025). For instance, RBDA indicated that prioritizing recreational activities over the Monument's natural, cultural and biological resources is contrary to the Presidential Proclamation 9563. FONC also stated the proposed trails and uses are inconsistent with Secretarial Order 3308, because they fail to manage the monument as an integral part of the larger, surrounding landscape.

RBDA expressed concerns that the proposed alternatives in the draft RMPA/EA could significantly degrade Monument resources (e.g., the ecology, habitat, cultural and archeological resources, and historic vistas). RBDA stated the RMPA/EA overall lacked information to adequately analyze impacts of the proposed uses, including a Preferred Alternative. Given the lack of available information, RBDA expressed concerns about adequate projections and planning/ mitigating accordingly.



Additionally, RBDA said that Alternative A does not qualify as a “No Project” alternative, as it does not reflect current management.

RBDA stated that the draft RMPA/EA insufficiencies (e.g., lack of resource surveys, comprehensive impact analyses and a defined Preferred Alternative) conflict with NEPA requirements; RBDA called for the BLM to conduct an EIS before finalizing a management plan. RBDA indicated the EIS should include full resource surveys, comprehensive analyses of potential impacts (particularly cumulative impacts), mitigation measures, and evidence the BLM has the capacity to manage the property aligned with the proposed activities.

## **B. Habitat and Wildlife**

RBDA stated components of the alternatives appear inconsistent with the California Coastal Act, as the proposed public access uses and development would disrupt environmentally sensitive habitat areas, and the EA does not provide adequate evidence it is compliant with the Coastal Act requirements.

RBDA indicated the RMPA/EA did not set adequate baselines to assess impacts habitat, wildlife, and special status species (e.g., water quality of salmonid habitat). RBDA called for baselines and additional analyses on a number of habitat and wildlife issues to evaluate impacts and implement adaptive management. RBDA called for more analyses particularly related to trails, parking, hunting and other recreational activities, and associated visitors, etc. The organization stated the BLM should study these impacts on wildlife, habitat, and adjacent lands.

## **C. Recreation**

RBDA expressed concerns that some of the proposed allowed activities (e-bikes, off-leash dogs, camping, campfires, and hunting) conflict with San Vicente Redwoods, which could lead management conflicts (e.g., connecting trails with different allowable activities) and the need for additional enforcement.

RBDA shared concerns with a number of specific activities, including:

- **Dogs.** Concerned that off-leash dogs may be hazardous to birds, small animals, and other habitat and sensitive species. BLM should either prohibit off-leash dogs or adequately analyze their impacts, propose mitigation measures, and demonstrate sufficient capacity to enforce mitigation.
- **Bikes/e-Bikes.** RBDA said e-bikes should be considered a motorized vehicle, and therefore prohibited according to the property deed restrictions and Presidential Proclamation 9563, superseding conflicting policies like Secretarial Order 3376.

## **Hunting**

RBDA identified several concerns including safety, noise disturbance, and affected wildlife. RBDA stated the RMPA/EA did not adequately evaluate or address how the BLM will mitigate these impacts.

## Redwood Meadows Ranch Homeowners Association

---

[ORG-RMRHOA]

### A. RMPA/EA

The Redwood Meadows Ranch Homeowners Association (RMRHOA) indicated the RMPA/EA overall lacked information to adequately analyze impacts of the proposed activities, particularly related to hunting and those that increase wildfire risk. Given the lack of available information, DNCA expressed concerns about adequate projections and planning/mitigating accordingly.

RMRHOA conveyed that the proposed public access and management are inconsistent with multiple policies and restrictions (e.g., Presidential Proclamation, National Landscape Conservation System, and the property deed restrictions). RMRHOA called for the BLM to better demonstrate the proposed public access is balanced and consistent with protection and preservation of the property's natural and cultural resources.

### B. Vegetation Management

RMRHOA stated the BLM should exercise caution when applying herbicides/pesticides in general. The organization said it opposed aerial spraying of herbicides or pesticides due to the public health risks to nearby communities and C-CD visitors and potential negative impacts on agricultural operations and grazing cattle.

### Fire and Fuels

RMRHOA identified wildlife as one of its greatest concerns and expressed support for management measures to reduce wildfire hazards (e.g., shaded fuel breaks and prescribed burning). The organization encouraged the BLM to manage recreation in a way that minimized wildfire risk (e.g., prohibit campfires, camping, and smoking).

### Emergency Services and Security

RMRHOA requested robust monitoring and enforcement now and in the future and that it is appropriately modified in relationship to visitation numbers and to illegal activities.

### C. Recreation

RMRHOA referenced the San Vicente Redwoods public access standards and encouraged the BLM to apply similar measures. For instance, activities and recreational uses that will not be allowed on the San Vicente Redwoods property through special use permits or under any circumstance include, but are not limited to, fire making, collecting, hunting, fishing, off-leash dogs, off-road vehicles or motorized dirt biking (including electric bikes), trail building and rock climbing, and rappelling.

RMRHOA expressed concern that the RMPA/EA did not include cumulative analyses for specific recreational activities like camping and campfires, which could significantly impact wildlife, neighbors, visitors, and wildfire risk).

RMRHOA requested that specific uses (i.e., hunting, camping, campfire, and smoking) be prohibited in the areas adjacent and around residential households, families, agricultural farms, schools, natural preserve areas, and businesses

#### **D. Hunting**

RMRHOA expressed opposition to allowing hunting on the property and to wildlife or habitat enhancements that promote hunting opportunities. The organization identified several public safety, noise disturbance, and habitat and wildlife concerns. RMRHOA stated that existing policies and regulations (e.g., Presidential Proclamation) do not support the proposed hunting on the property.

RMRHOA stated that the RMPA/EA lacked sufficient information about the proposed hunting activities (e.g., missing cumulative impact analyses on hunting) that should be adequately addressed before making a final determination related to the proposed alternatives.

### **San Andreas Land Conservancy**

[ORG-SALC]

#### **A. NEPA Processes and Content**

The San Andreas Land Conservancy (SALC) indicated the proposed activities are inconsistent with property restrictions and previous discussions with the BLM (e.g., 2014 Grant Deed, 2016 Correction Grant Deed and 2003 Citizen Advisory Group meeting), and that the BLM is required to manage the property in a way that offers public access and recreation, but not at the expense of the property's natural resources, habitats, and wildlife. SALC called for the BLM to specifically address "the protection and preservation of natural resources, restoration of endangered species and their associated natural habitats" consistent with the grant deed restrictions, including how the BLM will implement these restrictions in perpetuity.

SALC expressed a desire for more public involvement opportunities, expressing dissatisfaction with the planning process limiting protest appeals to an 'in-house' Interior Board of Land Appeals. SALC conveyed that an EIS process allows for greater public involvement and transparency.

SALC indicated the BLM should analyze and develop appropriate management measures to address impacts of other projects in the region (e.g., San Vicente Redwoods' mountain bike track), and the growth inducing and cumulative impacts that the proposed developments may have on other projects and adjacent properties. The BLM should also describe how it will set and enforce rules and limitations on activities and ensure habitat protection.

#### **B. Water Rights**

SALC called for the RMPA to list, quantify, and identify the legal status of any and all diversions on the property (including BLM and third parties). SALC conveyed particular concerns with Liddell Creek and San Vicente Creek diversion points. SALC indicated the BLM should identify and quantify its water reserves, including water reserved for endangered species' recovery.

#### **C. Habitat and Wildlife**

SALC expressed concerns that user activities will reduce the quantity and quality of habitat and water necessary for native species. SALC also stated that the Presidential Proclamation excluded other ecologically important species (e.g., tule elk, beaver, spotted owl, marten and marbled murrelet) that should be reintroduced to the area.

SALC called for a mechanism and schedule for retiring the leases that are inconsistent with the protection and preservation of C-CD's natural resources or restoration of endangered species habitat (e.g., tule elk, a native grazer, to replace cattle).

#### **D. Hunting**

SALC conveyed its opposition to allowing hunting, citing concerns related to fire risk, safety, habitat, and endangered species.

### **Safe Ag Safe Schools**

---

[ORG-SASS]

#### **A. Vegetation Management**

Safe Ag Safe Schools stated opposition to the use of synthetic herbicides and pesticides, particularly against aerial applications, as proposed in Alternative C. The organization expressed concerns that herbicides and pesticides could negatively impact water quality, riparian habitats, connecting marine habitats, adjacent communities, drinking water, streams, organic farms, etc. The organization encouraged the BLM to use other vegetation management options like manual means described in Alternative A and to develop an alternative pest management plan that omits using synthetic herbicides or pesticides.

### **South Bay Indigenous Solidarity**

---

[ORG-SBIS]

#### **A. General Planning, Management, and Coordination**

The South Bay Indigenous Solidarity (SBIS) encouraged the BLM to consult and coordinate with the Amah Mutsun Tribal Band (AMTB) before implementing major projects (e.g., large-scale plantings or prescribed burns) to avoid negatively impacting cultural resources.

#### **B. Cultural and Historic Resources**

SBIS emphasized a need to protect cultural resources and protect the fundamental human rights of Tribes and expressed appreciation for the BLM's engagement with the Amah Mutsun Tribal Band as an advisory partner in the management of the C-CD property. Additional recommendations included:

- Conduct archaeological surveys and impact reports prior to any activities that might disturb the soil (e.g., large-scale planting of trees, plowing/discing soil, the creation of embankments, or conducting controlled burns). Utilize tribal monitors in addition to archaeological monitors when earth-disturbing activities take place.
- Voluntarily agree to temporarily halt projects that are opposed by Tribal partners, and offer stakeholders the opportunity to comment on such projects before those projects are allowed to proceed in a mitigated form, if at all.
- Allow the Amah Mutsun Tribal Band unrestricted access or set aside protected areas in the Monument in order to respectfully gather traditional materials and utilize sacred spaces for ceremony.

#### **C. Fire and Fuels**

SBIS conveyed general support for a prescribed burn program to reduce risk of catastrophic wildfire and support ecological health. SBIS recommended that before conducting prescribed burns, the

BLM should coordinate with the Amah Mutsun Tribal Band and its Land Stewardship Program to avoid unintentionally harming culturally sensitive areas.

#### D. Vegetation Management

SBIS stated its opposition to aerial spraying of herbicides or pesticides due to potential negative impacts on adjacent communities, C-CD visitors, water quality (including safe drinking water), and sensitive habitats.

#### E. Trails

SBIS stated its support for a phased approach to trail building to allow for careful monitoring and adaptive management where needed. SBIS expressed concerns with trail construction in general due to risks to impacting cultural resources and disrupting sensitive ecosystems. Therefore, SBIS preferred the lower trail mileage proposed in Alternative B unless or until the BLM can demonstrate sufficient capacity to manage a more extensive trail network.

#### F. Recreation

SBIS identified conditions under which specific recreational activities can be allowed and balanced with natural and cultural resource conservation goals:

- **Trails/Campgrounds.** In general, keep recreational activities to designated trails and campgrounds. Prohibit off-trail activities (i.e., no off-trail hiking or dispersed camping).
- **Camping.** Allow only in designated camp sites.
- **Campfire.** Prohibit campfires due to risk of unintentional ignitions.
- **Dogs.** Keep dogs on leash and confined to trails.
- **Fishing.** Support the BLM's prohibition of fishing to protect endangered species and discourage off-trail activities.

#### G. Hunting and Shooting

SBIS conveyed its opposition to allowing recreational hunting, shooting, and any habitat or wildlife enhancements for the purposes of promoting hunting. SBIS said these activities are inconsistent with adjacent land uses and the conservation priorities identified in monument proclamation. The organization said these activities pose too high of a risk to wildlife, habitat, cultural resources, and public safety.

### Santa Cruz Climate Action Network

---

[ORG-SC\_CAN]

The Santa Cruz Climate Action Network submitted a form letter ([Form Letter B, Environment](#)).

### Santa Cruz County Horseman's Association

---

[ORG-SCC-HA]

#### A. General Planning, Management, and Coordination

The Santa Cruz County Horseman's Association (SCCHA) encouraged the BLM open public access through a phased approach to ensure components like trails are appropriate and are being used appropriately (e.g., San Vicente Redwoods public access plan).

SCCHA requested the BLM develop a plan to fund the monument in order to provide for trail maintenance, sanitation facilities, and law enforcement.

SCCHA suggested specific strategies to help expand and sustain the BLM's management capacity, including:

- **Parking Fees.** Charging for parking (including large group fees and annual parking passes) as a means to establish a sustainable funding source for property management.
- **Volunteer Patrol.** Establishing a volunteer wilderness patrol to augment the BLM's ability to provide public safety and protect sensitive resources.

#### **B. Facilities Management**

SCCHA suggested several parking facility amenities and services, including parking lots large enough to prevent overflow on local roads, water (for people, dogs, and horses), bathrooms, trash receptacles, regular bathroom and trash services, horse trailer parking with adequate staging space, seating/shade structures, and signage. The organization specifically requested five trailer parking spaces in each parking lot.

#### **C. Access and Trails**

SCCHA indicated its support for the trail plan described in Alternative C as it offered the most trail access. As previously mentioned, SCCHA supported for a phased approach to trails; SCCHA also requested a general larger buildout of trails. SCCHA supported connecting trails to neighboring properties such as San Vicente Redwoods.

SCCHA referenced and supported trail design and construction best practices that ORG-MBOSC articulated in its comment letter (e.g., methods to minimize disturbance to sensitive cultural, biological, and hydrological resources).

#### **D. Recreation**

SCCHA stated support for good access to all user groups and support the effort of other user groups advocating public access described in Alternative C. SCCHA conveyed support for multi-use trails, including offering single-use and uni-directional trails to minimize user conflicts. SCCHA requested that the BLM aim to provide equal miles for hikers and horses (which can be compatible on the same trails).

SCCHA suggested providing a large, fenced dog part for dogs to be off leash and require dogs to be on leash on trails.

#### **E. Hunting**

SCCHA stated it did not support hunting on the property as it seems contradictory to being good stewards of flora and fauna.

### **Santa Cruz County Farm Bureau**

[ORG-SCCFB]

#### **A. Agriculture and Grazing**

The Santa Cruz County Farm Bureau (County Farm Bureau) expressed concerns that the draft RMPA/EA would not adequately protect or preserve agriculture and grazing operations. The County

Farm Bureau identified several statutes, policies, and legal requirements (e.g., Presidential Proclamation, California Coastal Act, and Coastal Development Permit 3-11-035) that offer protections for preserving current agriculture row crop production. The organization stated that the EA failed to identify and evaluate the impacts of the Alternatives on the local farming operations and grazing (e.g., drift or transport of herbicides onto nearby organic farms, trespassing, vandalism, and stress to grazing cattle) or articulate mitigation measures against impacts. The organization also requested the BLM further describe the benefits that agriculture and grazing offers (e.g., land connectivity and reducing vegetation wildfire fuels).

## San Diego Mountain Bikers Association

[ORG-SDMBA]

### A. Access and Recreational Activities

The San Diego Mountain Bikers Association (SDMBA) submitted comments similar to [FORM A-MTB](#) related to:

1. Multi-User Activities
2. Total Trail Access
3. Trail Connection to San Vicente Redwoods
4. Specific Trail Design (Bonny Doon Rd)
5. Mountain Bike Directional Trails
6. Trail Connection to Rail Trail
7. Special Use Permits
8. Acquisition/Easements
9. E-bikes

In addition to the comments similarly stated in [FORM A-MTB](#), SDMBA also expressed support for trail connectivity between east and west ends of the property.

## Sempervirens Fund

[ORG-SF]

### A. RMPA/EA

The Sempervirens Fund stated several statutes, policies, and legal requirements (e.g., Presidential Proclamation; Omnibus Public Lands Act; and BLM policies including Secretarial Order 3308, 2011 15-Year Strategic Plan, and policy manuals 6100 and 6220) dictate the property should be managed in a way that prioritizes conservation of its ecological, archeological, and cultural values over other uses, including recreation, within the National Conservation Lands.

### B. General Management, Planning, and Coordination

Sempervirens Fund conveyed the C-CD property is important and unique in that it serves as an essential link, both for wildlife and recreation users, to other portions of the larger landscape, and requires substantial stakeholder coordination and engagement.

The organization urged the BLM to complete more thorough baseline inventories of natural and cultural resources prior to commencing any new recreational activity. BLM should also develop adaptive management criteria that outline the circumstances under which recreation uses might be limited or modified if deleterious impacts are observed. Adaptive management criteria and plans should be completed before new recreation is allowed.



### C. Cultural and Historic Resources

Sempervirens Fund emphasized that the property be managed in ways that ensure the Native American resources are honored and preserved.

### D. Fire and Fuels

Sempervirens Fund encouraged the BLM to develop a comprehensive wildfire plan in coordination with partners including CAL FIRE, local fire safe councils, and surrounding communities. The organization supported the proposed prescribed burning program to promote ecological health and reduce risk of catastrophic wildfire.

### E. Vegetation Management

Sempervirens Fund opposed use of aerial herbicide spraying or other forms of broadcast distribution due to risks to habitats, water quality, and adjacent communities. Except for aerial spraying, the organization supported the BLM's overall Weed Management Plan proposed in Alternatives B and C, such as using natural management methods like cattle to reduce non-native vegetation.

### F. Access Points and Trails

Sempervirens Fund urged the BLM to limit its trail footprint whenever possible and gather wildlife baseline data before trail buildout to limit impacts to wildlife. The organization stated it opposed the extensive trail buildout described in Alternative C unless the BLM demonstrated it has the capacity to manage the more extensive trail network. The organization supported using a phased approach for trail buildout so that impacts can be monitored and inform adaptive management.

Sempervirens Fund supported the BLM's regional trail network considerations with San Vicente Redwoods and others (e.g., Rail Trail).

The organization expressed concerns about trespassing and recommended against trails near San Vicente Redwoods where there is not a clearly planned connection (e.g., opposed to the proposed Agua Puerca Trail).

Sempervirens Fund shared specific safety concerns with the proposed Warrenella Road Access Point and recommended the BLM close Warrenella Road to all recreational uses and also route trails away from the road. The organization advised the BLM to use the road only for administrative or emergency services.

### G. Recreation

To minimize visitors' impacts, Sempervirens Fund recommended recreation should only occur in concentrated and defined areas where the BLM has sufficient data to ensure that conflicts can be avoided.

The organization identified a number of activities that should be allowed, limited, or prohibited, including:

- **Access.** Limiting all recreation to established trails and campgrounds (i.e., no off-trail hiking).
- **Camping.** Opposed to campfires and dispersed camping. Consider limiting camping (e.g., seasonal limitations).

- **Dogs.** Opposed to allowing dogs being off leash. If dogs are allowed, dogs should be on leash and only on designated trails.

## H. Hunting

Due to concerns about public safety and impacts to habitat and wildlife, Sempervirens Fund stated it opposed recreation hunting and any wildlife or habitat enhancement promoting hunting opportunities.

## Save the Redwoods League

[ORG-SRL]

### A. Vegetation Management

Save the Redwoods League stated that spraying herbicide by aerial application potentially threatens or compromises future efforts to protect natural resources on C-CD and San Vicente Redwoods properties.

### B. Trails and Access Points

Save the Redwoods League expressed support for creating a regional trail network, including connecting to trails on the San Vicente Redwoods property.

The organization identified concerns with particular access points:

- **Molino Creek Trail.** Requesting modifications to the trail as described in Alternative A to better connect to the San Vicente Redwoods property.
- **Warrenella Road.** Safety concerns due to the narrow road. Ending the proposed trail at the San Vicente Redwoods property border risks trespassing onto the property that is not designated for public access.

### C. Recreational Activities

Save the Redwoods League indicated there should be better alignment in allowable recreational activities between C-CD and San Vicente Redwoods (e.g., connected trails allow for the same uses).

The organization expressed general support for accommodating hiking, biking, and equestrian uses.

The organization shared concerns with allowing the following activities due to potential negative impacts to natural resources on both properties:

- Off-trail hiking or camping, even with special use permits
- Hiking with dogs off leash
- Paragliding or hang gliding
- E-bikes

### D. Hunting

Save the Redwoods League recommended against allowing hunting on the property, citing public health and safety concerns, including potential risks to staff and contractors managing San Vicente Redwoods.

## US Hang Gliding and Paragliding Association

---

[ORG-USHPA]

### E. Hang Gliding / Paragliding

The US Hang Gliding and Paragliding Association addressed common concerns about allowing paragliding and hang gliding and offered several specific suggestions for safely allowing these activities (e.g., site scouting, pilots carry emergency equipment, and applying a phased approach for allowing activities).

### 3.3. FORM LETTERS

#### Overview

---

The BLM received two types of form letters – one focused on public access and recreational activities, including mountain biking [“Form Letter A” - FORM\_A-MTB], and the other focused on natural resource and recreation/trail management issues [“Form Letter B” - FORM\_B-ENV]. The exact wording of some of the form letters varied slightly, but the BLM reviewed them all to ensure the public comments are considered appropriately.

#### Form Letter A (MTB) - Author List

---

The BLM received 331 submittals for Form Letter A (omitting three duplicates). The following individuals submitted form letters focused on public access and recreational activities. 35 submittals were either anonymous, illegible, or did not provide a name. An [example of Form Letter A](#) follows the author list.

Jesus A.	Doug Bloom	Bryan Cobb
R. Adams	Jim Boardman	Maury Cohen
Chessa Adsit Morris	Tony G. Bommarito	John Cohn
Stephanie Aguiar	Troy Boone	Aaron Cole
Stian Alesandrini	Jason Borgen	Harry Cominos
David Allen	Gary Boulanger	Matt Conn
Jackson Allen	Peter Braun	Philip Cox
Matt Ammann	E. Brenner	Burke Culligan
Adam Anderson	Joaquin Bridges	Mary Kate Cunningham
Jeff Anderson	Guillaume Brivet	Emily D
Joel Atleinberg	Shannon Brockman	Steve D.
Andrew Bactzus	Brook Burley	Joseph David
Chris Baker	Tina Butler	Eve Davidson
Tony Ballard	Oscar C	Mark Davidson
Scott Bartlebaugh	Scott C	Lam Day
John Bartron	David Cameron	Nicholas Decker
Brier Basilko	Kristen Cameron	Ed Dee
Terrence Bauer	Jesus Campos	Michel Deloux
Alex Becker	Piet Canin	Hannah Dillard
Asa Becker	Dave Carbonell	Matt Disney
Bill Becker	Brent Carlson	Malanie Doty-Cohen
William Becker	Tarren Carter	Dean Dubbe
Robert Beckman	Nathan Cauffman	Paul Dubiel
Steffany Beddes	Brian Chapman	Zach Dunn
David Benterou	Dan Chen	Colin Duwe
Lyle Bergerson	Tony Chen	Robert Easthope
Sarah Bernanrdini	Kris Chopra	Andrew Ebberg
Daniel Biagiotti	Oscar Chorizo	Jennifer Eisele
Mary Bishop	Leslie Chow	Daniel Elenius
Matthew Blain	Judy Clayton	Bob Estes
Roland Blanton	Daniel Clemens	Mike Evans

Lori Fabris  
Kyle Feldmann  
Fernando Fernandez  
Gabriel Flores Saiffe  
Todd Ford  
Chris Fox  
Natasha Fraley  
Sergio Fuentes Jr.  
Ari Garabedian  
Rob Gaukel  
Stacy Geiken  
Megan Gemelos  
Steven Gemelos  
Jesse Gibson  
Ian Gillies  
Kevin Glisson  
Shelby Gol  
Janice Golda  
Daniel Gomez  
Martin Gomez O.  
Abel Gonzalez  
Brian Gonzalez Ortiz  
Ian Goodfellow  
Kayla Graff  
Benjamin Griffes  
Kyle Gronin  
Amber Gustafson  
Curtis Hamm  
Paul Haney/Brooke Elliot  
Casey Hansen  
Jim Hasenauer  
Gary Hatcher  
Kevin Hays  
Lindsay Helmuth  
Keith Henderson  
Dale Hendsbee  
Talia Hernandez  
Carl Hettiger  
Tyson Hill  
Ryan Hoffman  
Paul Hogan  
Scott Holland  
Chris Holmes  
Veronica Hoover  
Steve Horner  
Matt Hornland

Colin Hughes  
Dan Hughes  
Jason Hughes  
Kevin Ivey  
Doug Jacobson  
Michael Jordan  
Michelle Kacy  
Jen Karno  
Travis Karrle  
Pete Katsaros  
Kirk Kaubish  
Roger Kern  
Jeffrey Kung  
Mike Labbe  
Tim Landeik  
John Leckrone  
Seong Lee  
Emma Lepak  
Jonah Lepak  
Pam Linstedt  
Ryan Loomis  
Lindsey Loperena  
Ted Lorek  
Peter Lunk  
Dylan MacDonald  
Sieg Magenheimer  
Jenifer Mandella  
Rick Mathers  
Brian Mccarthy  
Brent McCoy  
Emily McKissock  
Chris McNiff  
Morgan Meredith  
Isaac Merrill  
Juan Meza  
Nicole Miller  
Jeffrey Mize  
Rene Monroy  
Doug Moore  
Jamie Morgan  
Tom Morgan  
Harry Motro  
Marin Muller  
Caroline Murphy  
Elana Nadel  
Andre Nagel

Paul Neall  
Michael Nelley  
Amy Nelson  
Nancy Newsom  
G. Nichols  
Ben Nielsen  
Rob Nolan  
Brendan O'Neill  
Rick Ortenblad  
Tobin Ortenblad  
Edward Owen  
Miguel Pacheco  
David Palic  
Scott Papola  
John Parker  
John Parsons  
Justin Peck  
Tim Peek  
Tony Perkins  
Kent Persson  
Richard Petersen  
Blair Peterson  
Amy Phinn  
Ryan Phinn  
Monica Pielage  
Arleen Pietrzak  
Michael Pisano  
Trent Poltronetti  
Samantha Price  
Ximena Prugue  
Mike Pruitt  
Paul Raffaeli  
Michael Raider  
Heather Raponi  
Zebulah Rapp  
Jonathan Reber  
Bill Reno  
Ruben Reyes  
Jon Rhinehart  
Donna Riggs  
Gary Riggs  
Darius Rike  
Luis Rivera  
Sara Roach  
Mark Robb  
Mary Anne Robb

Paul Roberts  
Kent Robinett  
Jenny Robinson  
David Rocha  
Charles Rogerson  
Dirk Rohloff  
Julie Rohloff  
Mike Rolcik  
Saffron Roohani Russo  
Laura Rose  
Graham Rosemary  
Bill Russell  
Robert Russo  
Nicole Rutherford  
Hayden Ryan  
Triago Santos  
Tom Schiess  
Laura Schniedwind  
Rich Schwerin  
Rich Serten  
Christopher Seruge  
Sam Shaffer

Neil Silva  
John Simmon  
Diana Slater  
Allison Smith  
Justin Smith  
Dustin Snider  
Al Souza  
Wyatt Starn  
Ashley Starr  
Cassie Steel  
Joel Steinberg  
Tanner Stinchfield  
Krista Stivala  
Manny Swan  
Erik Swannack  
Jou Takao  
Emily Tatasciore  
Coral Taylor  
Antonio Thomas  
Bryan Thompson  
Robert Tidmore  
Ray Tracy

Heather Troy  
Jesus V.  
Jonathan V.  
Luis Valerio  
Nathan Van Zandt  
Dennis Vander Meer  
Kees Vander Meer  
Matthias Vitten  
Topher Walters  
Peter Wampler  
Christine Weir  
Isaac West  
Matthew Wilbur  
Gle Williams  
Craig Wilson  
Brent Wood  
Luke Wroblewski  
Peter Yee  
Lisa Young  
Andy  
Mark

## Form Letter A (MTB) - Example

[FORM\_A-MTB]

SUBJECT: Request for Public Input on the Draft Cotoni-Coast Dairies Property Management Plan

BLM Central Coast Field Office,

Cotoni-Coast Dairies (CCD) is an area with both ecological and cultural importance, and has the potential for a healthy and sustainable trail network to serve the needs of local residents and visitors of the Santa Cruz Coast. As this project moves through the public comment phase of the planning process, I ask that your team consider the following recommendations on the specific alternatives provided:

1. Biking, hiking, and equestrian access is the key to providing the public with an immersive natural experience.
2. Of the three proposed alternatives, only Alternative C provides a minimum viable mileage of trails for a meaningful user experience.
3. The trail connection to San Vicente Redwoods should be prioritized as it provides a key regional connection.
4. Please consider extending the loops along Bonny Doon Road to the Northern extent of the property. This will allow for a safe alternative to walking and cycling on the busy Bonny

Doon Road. This would also provide access for Bonny Doon residents for future regional connections.

5. Consider providing mountain bike specific-directional descending trails. This will help to avoid the re-use of steep fire roads as trails since they contribute disproportionately to erosion and injuries.
6. Providing a connection to the North Coast segment of the Rail Trail should be prioritized to provide a key connection to Santa Cruz and to Davenport. This will help to encourage alternative transport for access to Cotoni-Coast Dairies.
7. Special use permits will provide for a variety of events and partnerships that can highlight the natural features and recreational potential of the property. Please include provisions for competitive events as well.
8. Consider acquisition of neighboring lands, or easements, from willing sellers that support C-CD objects and values or provide opportunities for public access to C-CD, consistent with resource management goals and objectives. Collaborate with local experts in trail design and construction to ensure locally appropriate, high quality, and low maintenance trail infrastructure.
9. E-bikes should be allowed on bike access trails in a manner consistent with BLM regulations.

Thanks for your consideration and for your work stewarding our public lands.



## Form Letter B (ENV) - Author List

---

The BLM received 189 unique submittals for Form Letter B (omitting 13 supplemental/ duplicate submittals). The following individuals submitted form letters focused on natural resource and recreation/trail management issues. The exact wording of some of the form letters varied slightly, but the BLM reviewed them all to ensure the public comments are considered appropriately. An [example of Form Letter B](#) follows the author list.

Ed Aiken	Sandra Cohen	Sharon Hull
Jean Aiken	Ronit Corry	Suzanne Hume
Anna Akker	Caryn L. Cowin	Karen Jacques
Reed Alper	John Cremin	Navindra Jain
Allen Altman	Nicolette Czarrunchick	Joe Jordan
Judith S. Anderson	Cheyenne Daleiden	Willow Katz
Rosalind Andrews	Ashley Daniels	Susan Kauffman
Mark Anisman	Michael Dillon	Penny Khounta
Raymond Arent	Nancy L. Donahoe	Karen Kirschling
Julie Bannister	Coleen Douglas	Lindsay Knights
Thomas Batelly	Cynthia Dzendzel	Dennis Koski
Toni Bauer	Deborah Ebersold	Ed La Pointe
Kay Baum	Ros Edmonds	Tom Lawson
Abbie Bernstein	Eve Egan	Julia Lin
Dirk Beving	William Epstien	Chris Lish
Brandon Bible	Dave Fassler	Carol Long
Diane Bigler	James Feichtl	Steve Lustgarden
Jeri Bodemar	Mary Flodin	John R. Manning
Debora Bone	Jim Ford	Lynda Marín
Tracey Bonner	Alexander G Fordyce	Pat Marriott
Carol Bower Foote	Brett Garrett	Alice Martineau
David J. Boyer	Peter Gelblum	Susan Martinez
Joseph Braus	Argo Gherardi	Cynthia Mathews
Ralph Britton	Lois Goldfrank	Laura Mattos
Eva Brunner	June Graham	Barbara Mauk
Randall Brynsvold	Allan Greenberg	Bobbie Mayer
Neilson Buchanan	Jacquelyn Griffith	Ellen McCann
Waltraud Buckland	Maria Gritsch	Sandra McCann
Robert Burch	J. Barry Gurdin	Douglas McElwain
Leslie Burpo	Marie Haka	Sharon McGuire
Rewa Bush	Diana Hall	Quinn McLaughlin
Sam Butler	Michele A. Halligan	Philip McManus
Sheila Carrillo	Barbara Harper	Dan Melin
Jacqueline Cathcart	Terry Hawkins	Jan Merryweather
Susan Cavalieri	Kathlene Henry-Gorman	Liz Milazzo
John Charles	Freya Hermanson	Kendrick Miller
Don Chesterman	Nita Hertel	Julia Monahan
Rebecca Clark	Nancy Hiestand	Gailen Moore
Madeleine Clyde	Thomas D. Howell	Marcel E. Moran

Lizabeth Morell	Kenneth Sahm White	Glen Tepke
Pamela Morgan	Mark Salamon	Larry Thompson
Pam Newbury	Meg Sandow	Janet Tilp
Rae Newman	Lisa Schallop	Carolyn Trupti Israel
Eric Nylen	Peter Schubart	Elissa Wagner
Marion Odell	Janet Schwind	Marie Wakefield
Dave Olson	Kathryn Scott	Andrew Wallach
Satya Orion	Pauline Seales	Judy Ward
Anthony Owen	Marsha Seeley	Elizabeth Watts
Laurie Palmer	Lynda Sereno	A. Webb
Janet Parkins	Pete Shanks	Russell Weisz
Rex Payne	G. Silva	Janice Wilfing
Rachel Pfothenhauer	Philip Simon	Craig Wilson
Charlotte Pirch	Torunn Sivesind	Rachel Wolf
Alice Polesky	Jeffrey Smedberg	Charles Wolfe
Reetta Raag	Judith Smith	Nanlouise Wolfe
Maxine Reneker	Robert Snyder	Dolores Wood
Wyndham Robertson III	Todd Snyder	Heather Woods
Lois Robin	David Spinner & Andrea	Teri Xirakis
Dorah Rosen Shuey	Kean	Teri Yazdi
Dennis Ruby	Deborah St. Julien	Jan Ysselstein
Linda Rudin	Ketury Stein	Aaron Zachmeier
Cahterine Rusmore	Faith Strailey	Antonette Zeiss
Steve Rutledge	Kristin Sullivan	
Roland Saher	John Teevan	

## Form Letter B (ENV) - Example

[FORM\_B-ENV]

[Numbers were added to the example form letter below to assist with tracking the BLM's responses.]

SUBJECT: Cotoni-Coast Dairies National Monument Draft Resource Management Plan Amendment and Associated Environmental Assessment

Dear Mr. Blom:

Please accept these comments on the draft Cotoni-Coast Dairies National Monument Resource Management Plan Amendment (RMPA) and Environmental Assessment (EA). [You may add an introduction of who you are and your connection with Cotoni-Coast Dairies National Monument] I care deeply about the future management of the Monument and encourage the Bureau of Land Management (BLM) to work cooperatively with all its partners to protect the natural and cultural resources of this important landscape. I appreciate this opportunity to comment and appreciate BLM's commitment to addressing the circumstances and values related to management of the public resources within the Monument.

There are several key issues that I am concerned about and several that I am supportive of that are presented in the three Alternatives comprising the draft RMPA and EA. My recommendations to the BLM are as follows:

### **Natural Resource Management**

1. I oppose aerial spraying, an option proposed under Alternative C in the draft RMPA. Under no circumstances should BLM utilize broadcast spraying of herbicides or pesticides as proposed in Alternative C, due to its potential for negative impacts on adjacent communities and monument visitors, as well as on the monument's water quality, riparian habitats, and connecting marine habitats. The streams in this landscape provide the drinking water for the town of Davenport and the City of Santa Cruz; aerial spraying has the potential to contaminate this important water source.
2. I support BLM's Weed Management Plan presented in Alternatives B and C. Overall, BLM is proposing a comprehensive plan to combat invasive plant species across Cotoni-Coast Dairies which will greatly enhance the health and abundance of native species. However, I encourage BLM to act judiciously in using herbicides and pesticides to meet their weed management goals and reiterate my opposition to aerial spraying for reasons stated above.
3. I support BLM proposing to continue, and expand, its shaded fuel break projects along Warrenella Road and Bonny Doon Road to mitigate the risks of wildfire and keep surrounding communities safe.
4. I support a prescribed burning program on Cotoni-Coast Dairies as proposed in Alternatives B and C to promote ecological health and reduce the risk of catastrophic wildfire.
5. I oppose wildlife "enhancement" and any management efforts that artificially manipulate wildlife or habitat purely for the purposes of supporting game species that can be hunted. This has significant potential to impact and disrupt existing wildlife populations and vegetation communities and is inconsistent with the conservation priorities expressed in the monument proclamation.

### **Recreation and Trail Management**

6. I oppose recreational hunting within Cotoni-Coast Dairies, an option presented in both Alternative B and C. I recognize that hunters have a legitimate place on other public lands and play a positive role in conservation in this country. Nevertheless, I strongly oppose hunting on Cotoni-Coast Dairies. The property is simply too small with too many people nearby for hunting to be done safely. Many people live directly adjacent to the property and there is a highway along one border of the monument. I am greatly concerned about the safety of other recreationists, neighbors, and drivers on Highway 1 and Bonny Doon Road. Hunting is inconsistent with adjacent land uses and places too great a stress on already sensitive wildlife populations.

7. I oppose off-trail hiking and dispersed camping. The monument proclamation documents the many sensitive and imperiled plant species on the monument. BLM has also acknowledged that they have not completed a thorough inventory of the property's cultural resources but they are expected to be significant. To help mitigate the impact of monument visitors on these cultural resources as well as on vulnerable species, recreation should only occur in concentrated and defined areas. We recommend all recreation be limited to established trails and campgrounds. In relation to this recommendation, I also encourage BLM to ban campfires in order to minimize potential wildfire ignition sources.
8. I oppose off-leash dogs. I do not support dogs off-leash or off-trail as this has a highly negative impact on wildlife, higher potential to spread invasive species, and can create significant conflicts with other recreational users.
9. I support the creation of a trail connection between Cotoni-Coast Dairies and San Vicente Redwoods (provided in both Alternative B and C) to facilitate the establishment of a regional trail network. Similarly, I appreciate the consideration BLM has shown to other possible regional trail connections, including the proposed Rail Trail. Collectively, these trail networks could provide a transformative set of recreation opportunities in this region.
10. I support a phased approach to trail building. It is important that the monument finally be opened to the public for recreational opportunities. However, this is a sensitive ecosystem. For that reason, I am pleased to see BLM proposing that public trails be constructed and opened in a phased approach so that impacts can be more carefully monitored and adaptive management can be applied where needed. For this same reason, I support the lower trail mileage proposed in Alternative B unless or until BLM can demonstrate it has the capacity to manage a more extensive trail network.
11. I support the prohibition on target shooting. I am pleased that target shooting is not included in the range of recreational activities being proposed. Because the monument is relatively small and there are many adjacent communities, this recreational activity would present a significant safety risk.
12. I support the prohibition on fishing. I agree that fishing is inappropriate on the monument, particularly given the presence of endangered anadromous fish like Coho and steelhead.

Thank you for this opportunity to comment on the draft Cotoni-Coast Dairies National Monument Resource Management Plan Amendment and Environmental Assessment.

Sincerely,  
Your full name, address, and contact information

## SECTION 4 | INDIVIDUAL COMMENTERS

The tables in this section list the individuals who submitted comments not associated with a particular agency, organization, or form letter. Individuals who indicated they are affiliated with a specific business / company are noted. While individuals often commented on multiple topics (in fact, many called for a sustainable balance among diverse interests), this section groups individuals by the primary issue mentioned in the comments. Excerpts from comments are also provided.

### 4.1 NEPA AND GENERAL MANAGEMENT/PLANNING

#### 4.1.1 RMPA/EA Process and General Management/Planning

Comment Code	Commenter
IND-0053	C. Doll
IND-0122	Joel Kauffman
IND-0123	Emma Kelsey
IND-0142	Mark Lipson, Molino Creek Farm
IND-0196	Josto Puddu
IND-0210	Drew Rogers
IND-0219	Ken Sanford
IND-0267	Anita Webb
IND-0269	Janet Webb
IND-0275	Sarah Wise

Examples:

**IND-0142:** *The Cumulative Effects analysis is inadequate and constitutes a major defect of the Draft EA/RMPA. Recommendation: A full EIS should be conducted with greatly increased emphasis on cumulative effects and corresponding planning scenarios to mitigate these impacts.*

**IND-0275:** *I propose you provide an Environmental Impact Statement rather than an EA. Only an EIS will provide the info needed to manage the property and all associated environmental concerns effectively.*

**IND-123:** *I would like to voice my support of additional monitoring to occur before the implementation of any management plan... BLM should take clear direct monitoring action to adequately capture the current ecosystem landscape prior to trail construction. The way in which monitoring efforts are approached can directly influence the success of the resulting management actions.*

#### 4.1.2 Non-NEPA or BLM Issues / Non-Substantive

Many comments raised concerns that are not environmental issues within the context of the National Environmental Policy Act (NEPA) or are outside the scope of the C-CD RMPA/EA because they are not under the authority or within the jurisdiction of the BLM.

Several comments lacked substantive input to inform the draft RMPA/EA review (e.g., expressed support or opposition for a particular alternative without additional discussion).

Comment Code	Commenter
IND-0286	Elizabeth
IND-0002	Ian Alper
IND-0005	Mike Anciaux
IND-0030	Ralph Britton
IND-0060	Linda Farnell
IND-0070	Jeff Fromberg
IND-0073	John Gamman
IND-0079	North G. Grueskin
IND-0080	Laura Gustoson
IND-0129	Bliss Kok
IND-0146	Thalia Lubin
IND-0160	Karla McNamara

Comment Code	Commenter
IND-0162	Michelle Mehlhorn
IND-0191	Sandi Pensinger
IND-0201	Robert Reed
IND-0216	Gary Ruppel
IND-0221	Linda Schauble
IND-0240	David Stull
IND-0243	Marie Takada
IND-0261	Lorie Wade
IND-0276	Lori Wolfson
IND-0283	John Zey
IND-0284	Pam Zimmerman
IND-0290	[Anonymous]

Examples:

**IND-0070:** *This monument must be preserved.*

**IND-0276:** *...I strongly urge a refuge instead with little or no human intervention. There's a new priority. Less is more.*

**IND-0073:** *Please register my comment on draft RMPA and EA; I prefer the No Project alternative.*

## 4.2 PRESERVATION OF RESOURCES AND LAND USES

Commenters frequently emphasized preserving natural, environmental, and cultural resources. BLM also received comments that highlighted a need to protect existing land uses, particularly organic agricultural operations.

Comment Code	Commenter
IND-0020	Linore Blackstone
IND-0025	Lorrie Bornstein
IND-0026	Stefanie Bourcier
IND-0031	Cassandra Brown
IND-0033	Colleen Cabot
IND-0036	Bruce Campbell
IND-0037	Louis Robert Chiaramonte, SBIS
IND-0038	Rose Erline Chiaramonte
IND-0040	Nicolas Cortez
IND-0041	Amy Courtney
IND-0045	Patricia L. Damron
IND-0054	Benny Drescher
IND-0055	D. Dryer
IND-0061	William Feiling
IND-0067	Patricia Jeanne Forrest
IND-0069	Linda Friedlander
IND-0075	Reed Geisreiter
IND-0083	Will Hale
IND-0090	Emma Hartung
IND-0102	Ed Hopkins
IND-0104	Thomas D. Howell
IND-0105	Andrew William Hubbs

Comment Code	Commenter
IND-0114	Jacqueline A. Jenkins
IND-0118	Jocelyn Kahn
IND-0120	Jen Karno
IND-0121	Pat Katsky
IND-0125	Tehmina Khan
IND-0127	Ilana King
IND-0139	Geri Lieby
IND-0143	Kirsten Liske
IND-0145	Donna Logan
IND-0148	Nancy Macallister
IND-0150	Joan MacDonald
IND-0151	T. Malven
IND-0163	Tom Melkonian
IND-0166	Joanna Miller
IND-0168	Jane Mio
IND-0172	Dennis Morton
IND-0177	Joe O'Brien
IND-0180	Kerri O'Neill
IND-0188	Jennifer Parks
IND-0200	Paul W. Rea
IND-0205	Melissa Cara Rigoli
IND-0209	Dee E. Roe



Comment Code	Commenter
IND-0226	Beth Sherman
IND-0236	Mike Splain
IND-0254	Christine Z. Tucker
IND-0257	Ellen Uhler
IND-0263	Joshua Walden
IND-0265	Kim T. Waterson
IND-0266	Jennifer Watson
IND-0273	Chris Wilmers

Examples:

**IND-0168:** *Choice A has to be applied to the Cotoni-Coast Dairies Natl. Monument, because it does justice to the unique and bio- diverse Natural Resources. It is of outmost importance that best management policies are developed, evaluated in depth to assure that thorough, well thought out policies are in place for the protection and conservation of the Cotoni-Coast Dairies Natl. Monument's fauna and flora. This approach is essential since the National Monument Proclamation mentions that attention needs to be given to [sensitive species and biotic groups/communities]*

**IND-0025:** *I am concerned in particular by the plans in B and C to use herbicides to control invasive species and the plan not only to allow hunting but to actually stock wildlife for the purposes of enhancing recreational hunting. ...I would like to think that our federal lands would remain as toxin free as possible to protect the public who will use them.*

**IND-0037:** *Because all natural resource management efforts have the potential to impact cultural resources, I urge BLM to ensure that archaeological surveys and impact reports are completed prior to any activities that might disturb the soil. This includes the large-scale planting of trees, plowing/discing soil, the creation of embankments, or conducting controlled burns. Tribal monitors should be utilized in addition to archaeological monitors when earth-disturbing activities take place.*

### 4.3 SERVICES AND FACILITIES – THE 4 T’S

Comment Code	Commenter
IND-0008	Robert Arko
IND-0013	Catherine Bayer
IND-0013	Cathy Bayer
IND-0017	Clint Biddle
IND-0022	Barrett Boanen, Swanton Berry Farm
IND-0023	Bud Bogle
IND-0050	Carren Dixon, Buttercup Cakes Farmhouse Frosting
IND-0057	Alison Edwards
IND-0058	Zoltan Egeresi
IND-0062	Maria Fernandez
IND-0066	Blu Forman
IND-0087	Colin Hannon
IND-0092	Michelle Henderson
IND-0096	Jan Hilkert
IND-0098	David Hodges
IND-0099	Eric Hoffman
IND-0119	Henry Kaiser
IND-0126	Glenn Kimmel
IND-0128	Kathy King
IND-0130	Marion Kok
IND-0133	Bob Landry
IND-0134	Paul Langen

Comment Code	Commenter
IND-0140	Michael Liguori
IND-0144	Roxanne Lo
IND-0156	Gale McCreary
IND-0157	Brian McElroy
IND-0158	John McKeon
IND-0159	Torauni N. McKinney
IND-0161	Jennifer McNulty
IND-0173	Carmen Mulholand
IND-0178	Maureen O'Connell
IND-0198	Kristen Raugust
IND-0206	Ellen Rinde
IND-0215	Mathers Rowley
IND-0223	Courtney Scruggs
IND-0224	Matisse Selman
IND-0235	Jeanne Smith
IND-0238	P. Dawn Stevens
IND-0251	Kay Todd
IND-0262	Patricia Walberg
IND-0268	Dennis Webb
IND-0274	Hannah Wilson-James
IND-0277	Rose Wood
IND-0282	Chela J. Zabin
IND-0295	[Anonymous]

Examples:

**IND-0013:** *There is not any plan for enforcement of the 'rules'... there is no way for the BLM to know who goes into the wilderness and when they come out... there is no enforcement of littering, pollution, vandalism, people and animals going off trail...*

**IND-0235:** *The cost of enforcing regulations, including park boundaries, on these lands and protecting residents is quite large. Is there money available? As a resident living on the border of this proposed park I am very concerned for safety and security.*

**IND-0251:** *We know the reality of taking any action that would increase the risk of having a fire this area. There is limited fire protection with Cal Fire in Swanton and volunteers providing service from Davenport and Bonny Doon. In addition, medical response is a minimum of 30 minutes away. There is also limited to no cell reception throughout our area. It is very important that this reality be considered in any proposal that would greatly increase people coming into the North Coast area.*

**IND-0268:** *...the access point on Swanton Road is the most difficult to reach and would provide the least benefit to National Monument visitors. The Swanton Road site is dangerous to reach by car or bike, it isn't served by the bus system, it doesn't connect to the Santa Cruz Coastal Rail Trail or planned trails on San Vicente Redwoods, it will be the hardest for first responders to reach and it funnels traffic down a road that can barely handle the limited traffic that exists today, let alone the crowds that are going to be accessing the National Monument.*

## 4.4 PUBLIC ACCESS AND RECREATION

### 4.4.1 Educational Opportunities and Common Recreation (Hiking, Biking, and Equestrian Use)

Many commenters supported public access and encouraged fostering educational opportunities. Generally comments supported finding a balance that would allow for hiking, biking, and equestrian use. Other comments indicated they supported only one or two of the common activities (most often hiking and horseback riding) or expressed concerns with one or more of the common activities (most often biking).

Comment Code	Commenter
IND-0001	Jacob Albrecht
IND-0003	Timothy Alton
IND-0004	Christine Amber
IND-0006	Laura Marie Anderson
IND-0007	Manaj Apte
IND-0014	Garen Becker
IND-0015	Scott Bellecitti
IND-0016	Mike Bennett
IND-0027	Carla Braden
IND-0028	Mitch Bramlett
IND-0029	S. Briscoe
IND-0034	Rodney Cahill
IND-0035	John Caletti
IND-0039	Mark Conover
IND-0042	Jason Crandon
IND-0043	Mike Dahlberg
IND-0044	Susan Damon
IND-0046	Jeff Davdson
IND-0047	Casey Devonshire

Comment Code	Commenter
IND-0052	Lauren Dockendorf
IND-0056	Robert Easthope
IND-0059	Joe Fabris
IND-0063	James Fitzgerald
IND-0072	Alan Gale
IND-0078	Devon Goldsby
IND-0082	Joe Haberman
IND-0086	Garrett Hammack
IND-0088	Linda Harris
IND-0089	Russ Harris
IND-0091	George Haye
IND-0094	Jayne Hesley
IND-0095	DJ Higdon
IND-0100	Luke Holoubek
IND-0101	Kerstin Holster
IND-0103	Eliece Horton
IND-0106	Darren Huckle
IND-0107	Traci Hukill
IND-0109	Jesse Hull

Comment Code	Commenter
IND-0110	Emilee Hurley
IND-0111	Margaret A. Ingraham
IND-0112	Devon Jackson
IND-0115	Monica Jensen
IND-0117	Sarah Jordan, Girls Rock Board of Directors
IND-0131	Jan Koval
IND-0135	Denise M. Larsen
IND-0147	Michelle M.
IND-0149	Harrison MacDonald
IND-0152	Emily Marriott
IND-0154	Mike McCarthy
IND-0155	Travis McCort
IND-0164	Raymond Mendoza
IND-0165	Saris Mercanti, Ibis Cycles
IND-0167	Ryan Miller
IND-0169	Brian Monty
IND-0170	Alexis Morgan, Girls Rock Women's Mountain Biking
IND-0174	Erica Murphy
IND-0175	Syd Newson
IND-0176	Chris Northrup
IND-0185	Lindsay Overton
IND-0186	Don Palermini
IND-0189	Karissa Paxton
IND-0190	Chris Pearson
IND-0192	Evan Peterson

Comment Code	Commenter
IND-0193	Katy Pomatowski
IND-0195	Mike Pruitt
IND-0197	Yakeen Qawasmeh
IND-0199	Michael Rea
IND-0202	Steven Reeves
IND-0207	David Robinson, dave@therideguides.com
IND-0208	Justin Robinson
IND-0213	Mark Rooney
IND-0225	Renee Shepherd
IND-0229	Joel Shrock
IND-0230	Paul Shufflebotham
IND-0231	Heather Shupe
IND-0232	Ann Simonton
IND-0233	Oxo Slayer
IND-0237	Campbell Steers
IND-0239	Dimitry Struve
IND-0241	Loren Sunding
IND-0244	Charles Telesco
IND-0246	Catherine Thompson
IND-0248	Melissa Thompson
IND-0249	John Thornton
IND-0253	Nate Trumble
IND-0256	Andrea Turner
IND-0258	David Van Brink
IND-0259	Mike Vandeman
IND-0260	René Voss

Comment Code	Commenter
IND-0264	Collin Waledisol
IND-0270	Sam Weinstein
IND-0272	Patsy Wilkes
IND-0278	Todd Woodward
IND-0279	John Work
IND-0285	Chad
IND-0287	Maddie

Comment Code	Commenter
IND-0288	Michael
IND-0289	Mike
IND-0291	[Anonymous]
IND-0292	[Anonymous]
IND-0293	[Anonymous]
IND-0294	[Anonymous]

Examples:

**IND-0088:** *Particularly, I'd like to see challenging technical unidirectional mountain bike trails and MORE connectivity between the trail networks than option c.... Mountain biking has been a lifeline of exercise to get [those with injuries or joint issues] out into the natural world.*

**IND-0107:** *...Alternative C combines hiking, biking and horses on a majority of trails – not usually a good outcome for the horses, which are startled by the bikes.... A better option in my view is Alternative B, which offers a good amount of trail development, including a generous number of designated-use trail miles that separate mountain bikers from horses, and which does not feature hunting.*

**IND-0225:** *For example, there could be some bike-only one way trails many bikers go very fast and conflict with walkers and equestrians. At the same time, I definitely want to full development of trails for hikers and equestrians (both of which are very compatible in my long experience as both!). So perhaps a “separate but equal” trail plan needs to be looked at where necessary.*

**IND-0258:** *I'm personally excited by the future possibilities of Cotoni Coast Dairies and its development for recreational and educational activities. In particular, among the Trail choices, I naturally prefer (C), the most amount of trails. Even if we start with (B) and build out over time. One point though. Options B and C include only a single connection to the North Coast Rail Trail. It would be potentially valuable to include at least two, given the large extent of the Monument, and to further encourage non-car accessibility and creating route choices with variety.*

**IND-0260:** *I strongly urge the BLM not to allow mountain biking on any trails in the new monument, for the safety of visitors and natural resources. Also any e-bikes should be restricted to paved roads only.*

## 4.4.2 Hunting

---

### A. Supportive of Hunting

Comment Code	Commenter
IND-0012	Debra Baker
IND-0018	Alexander C Birkhofer
IND-0081	Roger Haas
IND-0187	David Palm
IND-0203	Joshua Restad
IND-0250	Matthew Titchenal
IND-0255	Jeff Tucker

#### Examples:

**IND-0250:** *I recognize that hunting needs to be done in a sustainable and safe manner and am confident this can be achieved with the help of the California Department of Fish and Wildlife.... If it is determined that hunting with firearms will not be allowed, I ask that the BLM please consider at least allowing archery hunting on the land during the deer archery and general hunting season for Zone A.*

**IND-0255:** *I would like to see this property be available for hunting and other recreational activities. BLM property is traditionally available for hunting throughout the nation. Santa Cruz County is exceptionally limited on areas to hunt. For this reason I believe this BLM property should be allowed for this recreational activity. There are many other areas in Santa Cruz County used for hiking bike riding and horseback riding. I believe this property again should be used for hunting or allowed on team. I am personally and archery hunter And would be interested in discussing this as well.*



## B. Opposed to Hunting

Comment Code	Commenter
IND-0009	Susan Arnold
IND-0010	Katherine Astromoff
IND-0011	Nicholas Astromoff
IND-0019	James Bishop
IND-0021	Susan Blake
IND-0024	Michael Bolte
IND-0032	Charles Bruffey
IND-0048	Daryl Dichek
IND-0049	Dan Dion
IND-0051	Daniel Dobson
IND-0064	Kevin Flynn, Sempervirens Fund
IND-0065	Alex Fordyce
IND-0068	Jan Freiwald
IND-0071	Alexander Gaguine
IND-0074	Fred Geiger
IND-0076	Lalita Godbole
IND-0077	Suhas A. Godbole
IND-0084	Joe Hall
IND-0085	Hilary Hamm
IND-0093	Jack Herman
IND-0097	Kirsten Hill
IND-0108	Douglas Hull
IND-0113	Karen Jackson
IND-0116	Ken Johnson
IND-0124	Susan Kent
IND-0132	Paul Krug

Comment Code	Commenter
IND-0136	George Leonard
IND-0137	Ross Levoy
IND-0138	Jocelyn Levy
IND-0141	Angela Lipanovich
IND-0153	Julie Mascarenhas
IND-0171	Joseph Morlan
IND-0179	Katherine O'Dea
IND-0181	Clay Olson
IND-0182	Jane Orbuch
IND-0183	Vivienne Orgel
IND-0184	Shawn Orgel-Olson
IND-0194	Ann Pomper
IND-0204	Donna Riggs
IND-0214	Tony Rostron
IND-0217	Saladin Sale
IND-0218	Kristen Sandel
IND-0220	Michael Schallop
IND-0222	Robert Schettino
IND-0227	Judi Sherman
IND-0228	Barry Shilman
IND-0234	Anthony Sloss
IND-0242	Ellen Sweeney
IND-0245	David Terrazas, Brereton Law Office
IND-0247	John Thompson
IND-0252	Michael Trionfetti
IND-0271	Jacqueline Wender

Comment Code	Commenter
IND-0280	Stephen Wyckoff
IND-0281	Jan Ysselstein

Examples:

**IND-0182:** ...I am concerned about Alternatives B and C that allow hunting. Hunting in an area with hikers, mountain bikers etc seems incompatible. I am not against hunting per se—as it makes sense in Central Valley Wetlands, but in a heavily recreated area—it just doesn't make sense from a public safety standpoint.

**IND-0247:** Of much greater concern to me is the possibility that hunting and shooting could be permitted on Monument property. Hunting and shooting are activities that are incompatible with other users, present a clear and present danger to hikers, bikers, horseback riders and neighbors, and that pose obvious threats to wildlife. Permitting hunting and shooting of guns on the property would be contrary to the primary objective of establishing the Monument, which is to conserve, protect and restore this still largely wild natural area. It also jeopardizes the safety and enjoyment of other users.