



SANTA CRUZ COUNTY GROUP
Of The Ventana Chapter
P.O. Box 604, Santa Cruz, CA 95061
<https://www.sierraclub.org/ventana/santa-cruz>
e-mail: sierraclubsantacruz@gmail.com

July 31, 2019

Sky Murphy, Planning and Environmental Coordinator
Bureau of Land Management, Central Coast Field Office
940 2nd Ave.
Marina, CA 93933-6009

Re: Resource Management Plan Amendment for the Cotoni-Coast Dairies Unit of the California Coastal National Monument, and Associated Environmental Assessment, Santa Cruz County, CA

Dear Sky Murphy,

Thank you for the opportunity to read and comment on the Resource Management Plan Amendment for the Cotoni-Coast Dairies Unit of the California Coastal National Monument, and Associated Environmental Assessment.

First, we wish to make the following requests for final concepts to include in the management plan and EA:

- That a dedicated bond be set aside from federal funding to be used for:
 - a. Describing baseline resource conditions for sensitive, native and invasive species; for water quality; and for soil erosion at the Cotoni-Coast Dairies Unit of the California Coastal National Monument prior to development of new access on the Cotoni-Coast.
 - b. Systematic monitoring of impacts of recreational and other human uses on sensitive and endemic natural resources, and for restoration of those impacts.
 - c. That formal, systematic impact monitoring and restoration continue in perpetuity, tied to measurable population goals for biotic species as well as erosive soils, water quality, and adaptive management
- That an independent research firm or other independently funded entity be contracted to oversee or conduct the monitoring and manage restoration.

Second, we wish to support and underscore the independent scientific contributions provided by Dr. Grey Hayes and Dr. Jacob Pollock. The County is fortunate to have scientific

specialists of this caliber to provide guidance for local resource management in this sensitive site.

Third, we would like to note that:

- Educational signage is used as a mitigation measure, but such measures are typically highly ineffective. To make sure there's no trash, for example, the project would need many animal-proof trash receptacles, and a staff person to walk the trails every day and pick up trash.
- Given the number of sensitive species, dogs should not be allowed on trails.
- Significant impacts include reducing the abundance of nesting birds and woodrats near trails and reducing the foraging area available to some species. High caliber studies must be provided for all sensitive species in this project area.
- The project should locate woodrat houses and avoid impacts to them. No evidence is provided to support the assertion that dismantling the houses, which can be used for decades, is a viable mitigation measure.

Thank you for considering these comments.

Sincerely,

Gillian

Gillian Greensite, Chair
Sierra Club, Santa Cruz County Group