

**to attention of: Ben Blom**  
**via email, August 1, 2019**

I am a 25 year resident of Coast Road near the Cotoni-Coast Dairies National Monument's southern and eastern boundary and have been involved in the process of planning for the Coast Dairies property since participating in the Citizen's Advisory Group organized by the Trust for Public Land in 1999. I am keenly aware of traffic patterns and also highway patrol, sheriff, fire and rescue responses as Highway 1 is within earshot.

The materials accompanying the NOI suggest access parking locations but absent a project description that specifies actual inland trail alignments or specific management actions associated with these locations, it is impossible for the public to "scope" in an accurate and meaningful way, locations where environmental impacts could be anticipated and analyzed. Lacking this information, these remarks are largely confined to impacts of traffic generated by increased visitation which can be foreseen based on the access locations presented in the NOI background documents.

It is obvious that the CCNM management plan is not intended to manage onshore areas so a full EIS is needed before amending the California Coastal Monument Resource Management Plan and allowing access to the property. Without such study and accompanying NEPA process, the property should remain closed until such time as the BLM has the financial resources to do an EIS establishing baseline conditions to inform adaptive management actions. For the Pt. Arena/Stornetta onshore expansion of the CCDNM, there was an immediate need for an interim management plan to be generated to manage existing grazing and recreational use. A full EIS was expected to follow but 4 years later that process has not been initiated. At CCDNM, public access is not allowed so the property should remain closed except for grazing and research until the BLM has ongoing funding to manage the property in a manner that will fulfill the intentions of the Monument proclamation.

**Please study traffic and parking impacts thoroughly. This requires a year-long site specific study identifying seasonal variations with traffic counts, incident reports and a daily tally of current parking area usage at sites that the BLM proposes to utilize for access to the CCDNM**

This study is needed to establish base line conditions, identify location specific visitor safety problems, and to inform adaptive management decisions that may be needed to remedy "spillover" impacts to adjacent property. The traffic projections referenced in the NOI Profile document at 2.15 (b), could not anticipate several developments that have taken place in recent years, including:

1)The donation of the coastal portion of the Coast Dairies property, seaward of Hwy. 1 to the California Department of Parks and Recreation, raising the visibility of the area, and resulting in a tremendous increase in visitation to the area, noted by myself and many other residents of the area

2)The initiation of cell phone service along the part of Hwy. 1 bordering the Monument expansion area, enabling nearby residents in the Bay Area to readily organize parties and meetups at specific beaches, particularly favoring those that are inaccessible to law enforcement. The advent of cell service has also enabled visitors from around the world to share dramatic coastal selfies encouraging their friends on social media planning to visit this area.

3)The California Coastal Commission introduction of the My Coast cell phone app to identify and facilitate access to beach destinations immediately across Hwy. 1 from the CCDNM expansion area. These beaches are accessed from unimproved parking areas that are often filled to overflowing for parties or when inland temperatures are high or coastal weather is fair on a weekend. This causes overflow parking to spill on to the Hwy.1 shoulder or into informal parking pullouts which forces bicyclists into the traffic lanes and leads to dangerous highway entry and exit conditions such as the fatal accidents at nearby Wilder Ranch State Park.

4)Nationwide, visitation has increased at outdoor attractions including along our coast . Problems with over visitation are already serious at several areas up and down Highway 1 from the CCDNM such as Point Lobos, Big Sur, and Muir Woods. Restrictions on visitation to these areas, already implemented or anticipated, will cause visitors to look elsewhere along Highway 1 for opportunities to visit the coast and adjacent areas and they will be attracted by the scenic opportunities offered at the CCDNM. In a presentation to the California Coastal Commission meeting in Half Moon Bay on Feb.6, 2019, California State Parks Santa Cruz District Operations Superintendent Terry Kiser told commissioners that they counted an average of 2.9 million annual visitors to the Park's northern sector along the San Mateo Coast just a few highway miles up Hwy 1.

**Please ensure all Coastal Act requirements are incorporated in the planning document.**

1)The Coastal Development Permit known as CDP 3-11-035 adopted by the Coastal Commission on April 12, 2012 (the "2012 CDP") is binding on the federal Bureau of Land Management as to the Coast Dairies Property to which the BLM holds title.

2)The CDP findings say: "Any interim access measures, as well as any other future management plans or other development, would be reviewed by the Commission under its federal consistency authority."

3)The 2012 CDP was relied upon in the Coastal Commission staff report recommending denial of a permit for a well on BLM property and the Commission adopted that recommendation, voting to deny the permit.

4)The CDP anticipated that public access would become available, saying the Interim Access Plan would provide opening two trails to the public (Liddell Creek Trail and the Molina pasture Trail ) for general day-use hiking

**Thank you for your consideration of these comments,**  
**Respectfully submitted by Marty Demare and on behalf of Jonathan Wittwer (vacationing)**

