

1 **UNITED STATES DEPARTMENT OF THE INTERIOR**  
2 **OFFICE OF HEARINGS AND APPEALS**  
3 **BOARD OF LAND APPEALS**

4 )  
5 ) IBLA Docket No. IBLA-2021-0313  
6 )  
7 ) SUPPLEMENTAL NOTICE OF  
8 ) APPEAL OF IMPLEMENTATION  
9 ) ACTION: MA-REC-23  
10 ) ESTABLISHING A DAY USE SITE  
11 ) (PARKING) AT WARRENELLA  
12 ) ROAD GATE  
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11 **SUPPLEMENTAL NOTICE OF APPEAL**

12 In accordance with 43 C.F.R. §§ 4.410, 4.411, and 4.413, Friends of the North Coast,  
13 Davenport North Coast Association, and Rural Bonny Doon Association (hereafter  
14 “Appellants”) file with the Interior Board of Land Appeals (“IBLA”) this Supplemental Notice  
15 of Appeal of certain implementation decisions made by Bureau of Land Management (“BLM”)  
16 in proceeding pursuant to substantial changes made without notice or process to the Resource  
17 Management Plan Amendment for the Cotoni-Coast Dairies Unit of the California Coastal  
18 National Monument (#DOI-BLM-CA-C090-2019-0015-RMP-EA). This Supplemental Notice of  
19 Appeal is filed pursuant to Appellants’ Notice of Substantial Change In Approved  
20 Implementation Action filed with the IBLA on May 4, 2022. By this Supplemental Notice of  
21 Appeal, Appellants appeal the substantial changes unlawfully being carried out as to  
22 Implementation Action: MA-REC-23 establishing a Day Use Site (parking) at Warrenella Road  
23 Gate. The changes include 1) the relocation of the proposed access driveway to the parking area  
24 to a location approximately 60 feet from intersection of Warrenella Gate Road and Cement Plant  
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1 Road, posing significant safety hazards at that location, and 2) the reconfiguration of the parking  
2 area. On April 18, 2022, the BLM Central Coast Field Office provided Appellants with an  
3 excerpt of design plans depicting the changes to Implementation Action: MA-REC-23.  
4 Appellants original Appeal filed July 22, 2021 remains in full force and effect and is still  
5 pending.  
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7 This a Supplemental Appeal to the original Appeal which was timely filed pursuant to 43  
8 C.F.R. §§ 4.22(e) and 4.411(a)(2)(i); hence this Supplemental Notice of Appeal is timely filed. A  
9 Petition for Stay of Implementation Action: MA-REC-23 is filed herewith.

10 Respectfully submitted this 11th day of May 2022.  
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21 Friends of the North Coast,  
22 Davenport North Coast Association, and  
23 Rural Bonny Doon Association  
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**PROOF OF SERVICE**

I, Toyer Grear, declare as follows:

I am a resident of the State of California, and employed in Oakland, California. I am over the age of 18 years and am not a party to the above-entitled action. My business address is 1939 Harrison Street, Suite 150, Oakland, CA 94612. On May 11, 2022, I served a copy of the following documents:

- Supplemental Notice of Appeal of Implementation Action: MA-REC-23 Establishing a Day Use Site (Parking) at Warrenella Road Gate


By sending the documents as an electronic mail attachment in PDF format to the e-mail addresses below

United States Department of the Interior Office of Hearings and Appeals Interior Board of Land Appeals 801 N. Quincy St., Suite 300 Arlington, VA 22203 ibla@oha.doi.gov	Erica Anderson, Attorney-Advisor Office of the Regional Solicitor Pacific Southwest Region U.S. Department of the Interior 2800 Cottage Way, Room E-1712 Sacramento, CA 95825-1890 erica.anderson@sol.doi.gov
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By enclosing the documents in an envelope provided by an overnight delivery carrier and addressed to the persons listed below and placing the envelope for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier

BLM California State Director 2800 Cottage Way, W1623 Sacramento, CA 95825	Office of the Regional Solicitor Pacific Southwest Region U.S. Department of the Interior 2800 Cottage Way, Room E-1712 Sacramento, CA 95825-1890
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I declare under penalty of perjury (under the laws of the State of California) that the foregoing is true and correct, and that this declaration was executed May 11, 2022 at Oakland, California.

  
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 Toyer Grear