



August 3, 2026

NOAA Office for Coastal Management
Section 312 Evaluation
Docket No. 260623-0150

Submitted electronically via: czma.california-evaluation@noaa.gov

Re: Comments on the Performance Evaluation of the California Coastal Management Program

To Whom It May Concern:

Quiet Warrior Racing LLC (QWR) respectfully submits these comments in response to NOAA's Section 312 evaluation of the California Coastal Management Program. We appreciate the opportunity to participate in this important review and to provide the attached policy report for NOAA's consideration as part of the administrative record.

For nearly five decades, California's Coastal Management Program has served as one of the nation's premier coastal conservation programs. The accomplishments of the California Coastal Commission, California State Parks, local governments, Tribal governments, federal agencies, nonprofit organizations, and countless volunteers in protecting California's remarkable coastal resources deserve recognition. The protection of sensitive habitats, expansion of public access, restoration of coastal ecosystems, and advancement of sound coastal planning have benefited present and future generations of Californians.

At the same time, Section 312 evaluations provide an important opportunity to periodically assess whether implementation of California's federally approved Coastal Management Program continues to reflect the balanced legislative vision established by both the California Coastal Act and the Federal Coastal Zone Management Act. Periodic evaluation is an essential component of adaptive governance and helps ensure that evolving management practices remain consistent with statutory objectives.

To assist NOAA in that review, Quiet Warrior Racing has prepared the attached report:

QWR Policy Report No. 2026-1 - *A Policy Review of Recreation, Public Access, Adaptive Management, and the Implementation of the California Coastal Act and Federal Coastal Zone Management Act.*

The report examines the historical evolution of California's Coastal Management Program through the lens of recreation policy, public access, adaptive management, legislative history, judicial interpretation, and long-term implementation trends. While the report discusses the significant reduction of motorized

coastal recreation opportunities over the past five decades, its broader purpose is not to advocate for the restoration of every historic riding area or to diminish the importance of environmental stewardship. Rather, it seeks to encourage thoughtful discussion regarding whether the cumulative implementation of California's Coastal Management Program continues to reflect the Legislature's original intent to balance conservation, public access, recreation, coordinated planning, and the social and economic needs of Californians.

The report also highlights examples of adaptive management—including Oceano Dunes State Vehicular Recreation Area and the Bureau of Land Management's Samoa Dunes Recreation Area—as case studies demonstrating how science-based management, monitoring, habitat restoration, and stakeholder collaboration can achieve meaningful conservation outcomes while continuing to provide appropriate recreational opportunities. These examples are offered as illustrations of management approaches that may be relevant to NOAA's evaluation of overall program implementation rather than commentary on any single permitting decision.

We respectfully request that NOAA consider the attached report as part of its evaluation of California's Coastal Management Program. We hope the report contributes useful historical context and encourages continued discussion regarding the implementation of the California Coastal Act's multiple policy objectives, including environmental stewardship, public access, recreation, coordinated planning, and adaptive management.

Because the attached report examines the implementation of several statutory objectives contained within California's federally approved Coastal Management Program, including recreation, public access, adaptive management, and coordinated planning, Quiet Warrior Racing respectfully requests that NOAA consider the report during its Section 312 evaluation and include it in the administrative record for this proceeding.

Thank you for the opportunity to submit these comments. Quiet Warrior Racing appreciates NOAA's commitment to periodic program evaluation and welcomes continued dialogue regarding the future of California's coastal management program.

Respectfully submitted,

Don Amador

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Attachment: QWR Policy Report No. 2026-1 – A Policy Review of Recreation, Public Access, Adaptive Management, and the Implementation of the California Coastal Act and Federal Coastal Zone Management Act