



SIERRA CLUB MARIN GROUP

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Superintendent, Point Reyes National Seashore
1 Bear Valley Road, Point Reyes Station CA 94956

Re: Giacomini Wetland Restoration Project

The Sierra Club, on behalf of its 7,000 Marin County members, has been following the Giacomini Marsh project since the National Park Service (NPS) acquired CalTrans restoration money intended over a decade ago to restore Big Lagoon.

No Action Alternative

As indicated to the public at the final 1996 meeting of the Big Lagoon / Highway One / Lone Tree Slide Technical Advisory Committee (TAC), to which the Marin Group Vice Chair was a representative, the CalTrans \$4+ Million was transferred from the Big Lagoon project with the commitment that it would fund the acquisition required for restoration of the Giacomini Ranch. As generally agreed among the TAC members, the original 11+ acre CalTrans mitigation requirement was a "sweetheart" deal: the 1 to 1 ratio is half the customary 2 to 1 requirement; the impacted habitat was measured before the Cal Trans spoils had settled and expanded to cover more area; and the extremely rare rocky intertidal habitat impacted was not to be mitigated with like-for-like, but rather with less rare wetland habitat, as in the initial 8-acre mitigation site in Bolinas Lagoon.

For all of these reasons, the remaining 3.6 acres of mitigation required from CalTrans was never agreed by the TAC to be the only acreage requirement for the Big Lagoon Restoration. On the contrary, it was always understood that significant additional wetland acres should be restored by Cal Trans. Consequently, in the view of the Sierra Club Marin Group, these same CalTrans mitigation requirements assumed by NPS are not satisfied by the 3.6 acres proposed under the Giacomini Marsh "No Action" Alternative. Any attempts to water down this mitigation requirement in the "No Action" Alternative would be vigorously opposed by the Sierra Club.

Furthermore, the TAC discussed and opposed the creation of a "mitigation bank" for any additional wetland acres beyond the 3.6 restored by CalTrans. In the view of the TAC, these additional acres were to compensate for the sweetheart mitigation terms on the original Highway One slide and not a wholly separate advance mitigation for a future event. Consequently, the Sierra Club would also vigorously oppose NPS agreeing to place additional acres beyond 3.6 into a mitigation bank for CalTrans.

Alternatives A and B

As indicated to the public at the final 1996 meeting of the Lone Tree Slide TAC, the CalTrans \$4+ Million was proposed to be transferred from Big Lagoon to Giacomini Ranch for several reasons, chief among which was that for roughly this same amount of money, the entire Giacomini Ranch, about 500 acres, could be restored to wetlands vs the 15 acres proposed to be restored at Big Lagoon. Consequently, the Sierra Club does not support either Alternative A or B, both of which are restorations of a portion of the Giacomini Ranch and neither of which fulfill the “full restoration” representations made to the TAC and to the public.

Alternative C and Alternative D (the Sierra Club’s preferred Alternative)

Alternative C proposes a full restoration, including a transitional vegetation buffer comprised of mostly native grasses in the southeast corner. A transitional buffer is necessary for wetland restoration, but this area is directly adjacent to homes and businesses and is proposed to be accessed by a trail. In our experience, open grassy areas in these circumstances become overrun by social trails and the proposed buffer will instead become a de-facto summer recreational area for neighbors and dogs, much as the current area is. In the winter, the proposed trail through this area will flood frequently and provide less than useful connections. Because the Sierra Club does not believe that NPS can adequately protect this area as transitional habitat and because this area is not the best location for a trail, we suggest that returning a greater proportion of this area to marsh, more like Alternative D proposes.

The Sierra Club supports Alternative D, as amended per our suggestions which follow. Alternative D proposes a full restoration which restores the southeast corner to marsh but does not appear to provide enough of a wetland buffer zone. We suggest that some intermediary treatment of this southeast corner might be appropriate between the unsustainable buffer of Alternative C and the inadequate buffer of Alternative D. Other aspects of D that we prefer over Alternative C are the wider Bear Valley Creek bridge (70 foot channel) proposed under the 7/9/04 revision because it would integrate Olema Marsh more fully into its historic connection as part of the tidal influenced Lagunitas Creek. We also support returning Tomasini Creek to its full original channel but we are concerned about the area between the base of the Point Reyes Bluff and the re-routed Tomasini Creek. This area currently provides extensive riparian habitat critical for many listed species, including red legged frogs, tide water goby and steelhead trout. As Tomasini Creek is re-routed westward, this riparian area should be encouraged to re-capture its former area and provide a continuum of unbroken and un-interrupted habitat from the Creek to the top of the bluff. To protect this continuous habitat, the abandoned rail road right of way (ARROW) should not be used as a trail, but instead should be re-configured where possible to eliminate the easy level-grade access for predators and innocent disturbers.

Access

The Sierra Club believes that access to the restoration site is important for an understanding of the restoration, provided that access does not compromise the restoration itself. Access to this restoration area should be limited and for purposes of education only, not for recreation or for transit. Point access to the marsh (as opposed to linear access per the draft Countywide Plan) should be via the existing trail from Highway One through the Martinelli tract to railroad point. The link to this access is currently via Highway One, but some have suggested using instead the ARROW running north from Point Reyes. In the opinion of the Sierra Club, restoration values would clearly be impacted by a pathway on the ARROW, which runs through sensitive riparian/ wetland areas. The Sierra Club has defended this area from incursion by the Writers Refuge Cabins and would continue to protect this sensitive area from further intrusion via the ARROW. However, the Sierra Club would be happy to work with path proponents to identify a linking route that is outside of these sensitive areas. We find it regrettable that State and County agencies with significant pedestrian and bike transportation responsibilities have attempted to pass the buck on to the NPS marsh restoration for this linking pathway. The ARROW was constructed with a century-old lack of environmental sensitivity; studies should be directed to more feasible routes.

The Sierra Club does support a proposed perimeter pathway running south from Point Reyes because it runs along the edge of the restoration where significant transportation infrastructure already exists and would link existing access points without creating more. The responsibility for this pathway should not be wholly on NPS and should not reduce money needed for marsh restoration. We encourage NPS and the County to work together for transportation funding required for this pathway. Currently a perimeter trail exists in 3 of the 4 "Action" Alternatives, but we urge NPS to include in all 4 of its "Action" Alternatives a permeably surfaced pathway physically separated from the highway, a maximum of 6-feet wide where possible, and running from Point Reyes to Inverness Park

As noted, for habitat protection reasons, we have suggested that the Point Reyes / Bear Valley segment of the proposed perimeter trail (the 3rd Street extension that requires a new footbridge at the former dam site to connect to with the remainder of the pathway route at Bear Valley Creek) should be replaced in all "Action" Alternatives. Our substitute Point Reyes / Bear Valley segment would run from Point Reyes across the Green Bridge, then around the corner to Levee Road, where it would connect at Bear Valley Creek to the remainder of the pathway route that uses the existing path at White House pool and continues in a new segment adjacent to Sir Francis Drake to Inverness Park. We believe this alternative segment has a number of advantages:

- 1) It routes bike and pedestrian traffic along the main public roads instead of through a residential section of Point Reyes Station;
- 2) It is more useable during winter and will flood less often because Levee Road will be higher than the opposite levee proposed for this trail segment;
- 3) It does not intrude into sensitive habitat;
- 4) It does not require the cost of a new footbridge at the former dam site;

- 5) It connects the communities better by providing access to Levee Road properties and Love Field that are bypassed by the currently proposed trail;
- 6) It provides access to the restoration site and the creek by making the existing access points on County Open Space land near White House Pool accessible from both Point Reyes and Inverness Park, rather than adding an access point through sensitive areas (the segment of path that would run along the levee on the north side of Lagunitas Creek);
- 7) The existing right-of-way along Levee Road would continue to be used in the winter and to access Love Field and Levee Road properties, resulting in public access both behind and in front of Levee Road properties.

There are significant obstacles to overcome to achieve a safe pathway connecting Point Reyes and Inverness Park, although an informal and unsafe pathway already (mostly) exists along the highway right-of-way. The County has a "share the road" program which could help. Guard rails keep cars out of Nicasio reservoir and could also keep cars out of Giacomini marsh. These guard rails could also separate traffic from an adjacent pathway. Residents have complained about traffic speeding through their Sir Francis Drake neighborhoods and a common method of traffic calming is to narrow lanes. These narrowed lanes (ie offset centerline) could also create space for an adjacent pathway where needed to avoid sensitive areas or to pass through congested areas.

The existing public road right of way is now subject to a variety of informal / illegal uses such as parking, car repair, cherry sales, overnight car camping, etc. However the public long ago acquired this right of way for the purpose of pedestrian and vehicle transit. The public should not bear the burden of additionally paying for (nor should the marsh bear the burden of being additionally impacted by) an added pathway simply because the legal right of way has been co-opted. Consequently, we do not support study of any path proposal that seeks to avoid these difficult problems by simply routing a path through the wetlands.

The Sierra Club believes that careful planning can result in a pathway which connects Point Reyes with Inverness Park largely along the existing road right-of-way as similarly proposed in the West Marin Pathways plan. We acknowledge that this route may require some minor incursions into NPS's Giacomini Ranch property where passage within the right of way is impossible. We believe that these minor incursions, if needed, should be balanced against the benefits of educating park visitors about wetlands without building more parking lots or access points. This path also provides significant ancillary benefits of getting residents out of their cars for shopping and school trips and for making safer and legitimate a currently unsafe and informal route that will continue to be used. The Sierra Club believes this perimeter Sir Francis Drake pathway will prove to be a benefit to the environment and to both the visitor and resident communities.

Thank you for the opportunity to comment on the Giacomini Marsh Project.

Gordon Bennett, Sierra Club Marin Group Vice Chair