



SIERRA CLUB MARIN GROUP

COASTAL SECTION C/O GORDON BENNETT

Box 3058 San Rafael CA 94912 40 Sunnyside Dr Inverness CA94937
anfranciscobay.sierraclub.org/marin 415-663-1881 gbatmuirb@aol.com

3/12/2004

California State Parks, Northern Service Center
Attn: Bob Hare
PO Box 942896, Sacramento, CA 94296-0001

RE: Comments on Tomales Bay State Park General Plan

The Sierra Club, representing its 7,000 Marin County members appreciates the opportunity to comment on the Tomales Bay State Park General Plan. We find that there are three fundamental problems with the Proposed Plan:

- ▶ Confusion between the Department's Mission and the State Park's Purpose
- ▶ Funded Impacts Dependent on Unfunded Mitigations
- ▶ Carrying Capacity is Determined After Development

Mission vs Purpose

The Department's Mission gives equal balance to "*protecting its most valued natural and cultural resources, and creating opportunities for high quality outdoor recreation.*" However, the Resources Code 5019.53 provides priority to protection of natural and cultural resources: "*the purpose of State Parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most important examples of ecological regions of California...improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural and ecological values for present and future generations. Improvements may be undertaken for recreational activities...so long as those improvements involved no major modifications of lands, forests or waters. Improvements that do not directly enhance the public's enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions in themselves...shall not be undertaken within state parks.*" Nevertheless, the Tomales Bay State Park General Plan proposes several recreational development (eg the mountain biking and car camping proposals) which do not conform to the purpose of a State Park and which will become attractions in themselves.

Unfunded Mitigations

The proposed plan encourages increased visitor use by proposing to develop high impact recreational activities that neither the parks resources nor the State Park Department's budget can sustain. The State Park Department as a whole and Tomales Bay State Park specifically does not have the budget to implement the proposed plan as a whole. Selective implementation of the various proposals can and will result in the park violating its pledge to protect the natural resources.

The plan notes on page 171 "One of the major 'checks' on the maximum level of visitor use of an area is the recommended size of parking lots and the general capacity of other recreational facilities." The concern is that this General Plan allows increased development and thus the removal of this major check. And while the plan admits that its proposed development will require follow-up monitoring, increased management and increased staffing, there is no reasonable expectation, given the current budget crises expected to continue into the foreseeable future, that these mitigations will be funded.

Given the current budget crisis that is expected to continue long into the future, the Sierra Club believes that a more appropriate General Plan would mitigate problems from existing development first. Incremental development of new facilities would only be proposed after problems from existing development have been conclusively demonstrated to have been mitigated.

Carrying Capacity

The carrying capacity is determined by three components: the ecological capacity, the sociological component, and "the ability of the Department to manage resources and visitors to mitigate unwanted impacts to resources and visitor experience at the park(pg 172). It is the third of these three components that raises concern. Furthermore, the plan notes that "the specifics of these three components listed above will be determined in post-general plan phases (pg 172). As with the unfunded mitigations above, given the current and foreseeable budget crisis, there is no reasonable expectation that the resources to define the specifics of a carrying capacity will be available in the future.

Furthermore, Tomales Bay Guidelines For Protection and Use (NPS 2001) show roughly constant visitation levels over the past decade, not the projected increase that this General Plan uses as a basis for its development proposals. In fact, the Plan's development proposals themselves will create the demand, rather than demand creating proposed development.

Site-Specific Comments: Heart's Desire

Regenerate Bishop Pines (HD-1): Yes

Continue Drive up Access: (HD-2) Yes

Preserve Indian Beach estuary and midden (HD-3): Yes

Restore natural outlet of estuary Redesign picnic (HD-4): Yes, although this alternative requires considerable more information to insure that existing resources are protected.

Formalize car top launching (HD-5) Yes

Redesign Vista Point (HD-6) : Yes, Current restroom sits on midden, adjacent to bay, with leach lines adjacent to stream. Septic needs to be designed for peak, not average use.

Develop group camping at former hike/bike campground (HD-7): No. Instead, restore former hike campground.

Develop 15 unit car-camping (HD-8): No. This area's Management Vision emphasizes the importance of non-mechanized and non-vehicular forms of recreation. Fifteen campsites under current codes would allow for 30 vehicles and 120 people, although these limits are in practice often exceeded at existing State Park Sites. Also, state law permits generators at campgrounds. This proposal has huge impacts to noise, nighttime light, traffic, septic and beach access.

Improve Fee Collection (HD-9): Yes

Maintain overnight security (HD-10): Yes

Continue staff housing (HD-11): Yes

Enhance trail connections to PRNS (HD-12): only if funding for both construction and a permanent endowment for maintenance can be raised from user groups or the private sector.

Site-Specific Comments: Inverness

Preserve current watershed values (I-1): Yes, this area is spotted owl habitat

Remove Structures (I-2): Yes

Site-Specific Comments: Inverness (continued)

Construct Day use picnic (I-3): No. This area should be managed as a natural area; having geographically separated recreational sites greatly increases management cost and complexity.

Develop trailhead (I-4): No, see above

Coordinate with adjacent landowners (I-5): Yes, after removal of structures, consider land trade or sale similar to that considered for North Marshall to consolidate ownerships and management for natural resource values

Site-Specific Comments: Millerton

Protect Tomasini Point (M-1): Yes

Hike and Bike trail in uplands (M-2) : No. Requires significant investment in bridges etc to avoid impacts to creeks; would result in an isolated mountain bike trail that would become an attraction unto itself, in violation of the State Park Purpose. As an alternative, consider one-way single-track trail to top of uplands that does not generate impacts on the creek.

Improve restrooms (M-3): Yes

Site-Specific Comments: Marconi Cove

Parking Restrooms, Educational panels, Picnic area (MC-1a): Yes.

Concessions, boat launch, boat trailer parking (MC-1b): No. This is far too extensive development at this small area whose cove is a refuge for avifauna and adjacent to established harbor seal haulouts and oyster farms. Impacts to these resources should be avoided by not proposing development rather than mitigated by post-development monitoring that may never happen.

Campground with 8 walk-in sites (MC-2): No, see above

Remove gas station (MC-3a): Yes. Adapt historic bathhouse (MC-3b): Yes, if coordinated with picnic area; remove if otherwise.

Maintain natural area at south (MC-4): Yes, expand to most of Marconi Cove except for picnic

Site-Specific Comments North Marshall:

Leave in natural state (NM-1): Yes, without trails; this should be maintained in a natural state

Consider Trade or Sale (NM-2): Yes, Audubon Canyon Ranch is an abutting landowner

Conclusion:

For the above reasons, the Sierra Club supports the No Action Alternative or the development of a new Alternative Four, which mitigates problems from existing development first and then proposes incremental new development consistent with the State Park's purpose, but only after problems from existing development have been conclusively demonstrated to have been mitigated.

Sincerely,

Gordon Bennett
Co-Chair Conservation Committee