



SIERRA CLUB MARIN GROUP

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The Sierra Club Marin Group on behalf of its 7,000 Marin County members wishes to submit the following comments on the Point Reyes National Seashore (PRNS) Horseshoe Pond (HSP) Restoration Environmental Assessment (EA).

We are please that PRNS is following up the Marin Group's 1988 letter expressing concern that "rotting manure carpeted" much of the HSP flood plain. PRNS's subsequent draft Ranch Unit Plan acknowledged that the HSP "severed as an ultimate sewage lagoon for the diary for many years." So we generally support Project Alternative C, which calls for full restoration of the natural hydrological and ecological functions, but we also have suggested modifications.

Scoping comments noted the then-current importance of HSP to birds and that a "restored HSP could be significant avian habitat." Prior to the spillway breach, HSP had year round water that provided a significant resource for fall-migrating birds. Water presence in the fall was the result of the higher water levels created by the dam that offset the higher bottom levels produced by the manure. Before either the dam or manure were present, HSP would also have provided year round water habitat because the lower water levels naturally controlled by the beach would have offset the lower the bottom levels without the manure. Therefore, restoration of natural processes, including fall avian habitat, will not be completed by the removal of the dam alone without reasonably concurrent removal of the manure.

The EA proposes that restoration of hydrological natural processes could induce scour and naturally remove the manure but that "the degree and timing of scour would be subject to natural conditions and may take 1-5 years to establish." The EA also notes that "NPS Plans implementation of a monitoring program that will document condition and performance of the restoration over time...at a minimum photo monitoring and water quality monitoring will be conducted."

The Sierra Club urges PRNS to also monitor scour to determine how effectively the restoration is proceeding in the 1-5 year timeframe proposed. We also urge PRNS to consider now what steps it might reasonably take if monitoring shows that Alternative C is making inadequate progress toward restoring natural processes, including the natural bottom level of HSP. The breach in the spillway has already caused a significant reduction in red legged frog habitat, which NPS proposes to mitigate by enhancement of the former waste site. That same logic should apply to the fall avian habitat if the proposed restoration proves incomplete.

Sincerely,

Gordon Bennett
Sierra Club Marin Group Vice Chair