

Superintendent
Point Reyes National Seashore
Point Reyes Station CA 94956
Attention: Giacomini Wetlands Restoration Plan

February 9 2007

Louis Jaffe <louis@overlookmedia.com>
PO Box 235
Point Reyes Station CA 94956

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To the Giacomini project management team:

I am a homeowner on the Point Reyes Mesa bluff who attended the January 5 2007 informational meeting on the Giacomini Wetlands restoration plan, and I have studied the full EIS / EIR.

Regarding the choice of alternative, I agree with the advocacy groups including the Sierra Club, the Environmental Action Committee of West Marin and others:

Alternative D, the environmentally preferred alternative, would be my preference. However, I would like to see the pedestrian / bike bridge over Lagunitas Creek added to Alternative D (as described in Alternatives A through C), to connect the important southern perimeter trail corridor.

If it's not possible to add the bridge to Alternative D, then I would prefer Alternative C.

Regardless of which alternative is finally implemented, I would like to bring your attention to an area of invasive vegetation not currently identified in the project mapping that urgently needs clearing. It is along the Tomasini Creek slough, immediately south of the Martinelli Ranch.

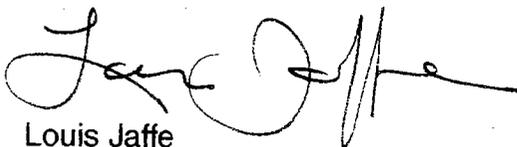
This backwater slough with its levee is retained in all planning alternatives as habitat for the endangered Tidewater Goby. Within view of my property on Point Reyes Mesa bluff, eucalyptus trees have taken root and are growing to large size on the levee itself. They may threaten the structural integrity of the levee.

On the historic railroad grade along the east side of Tomasini Creek a dense grove of eucalyptus has become established, continuing on private property ascending the bluff. French broom infestation is also extensive in this area.

I've spoken to the other adjacent property owners, and we would like to coordinate efforts with the Park Service to remove invasives and restore native habitat on the privately owned section of the Point Reyes Mesa Bluff bordering the historic railroad grade.

Please add removal of these invasives from the Tomasini Creek levee and historic railroad grade to any restoration plan. To document this issue, a map and photos of the area described are included with this letter.

Thank you very much



Louis Jaffe

Giacomini Wetlands restoration area:
Invasive non-native vegetation on Tomasini
Creek levee and historic railroad grade, adjacent
to Point Reyes Mesa Bluff, off Overlook Road
(near boundary of Martinelli Ranch).

Photographed January 29, 2007 by Louis Jaffe.



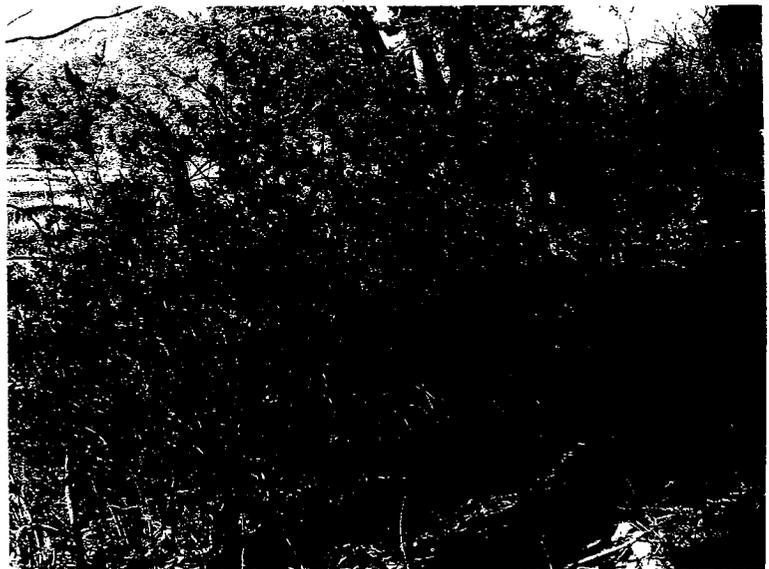
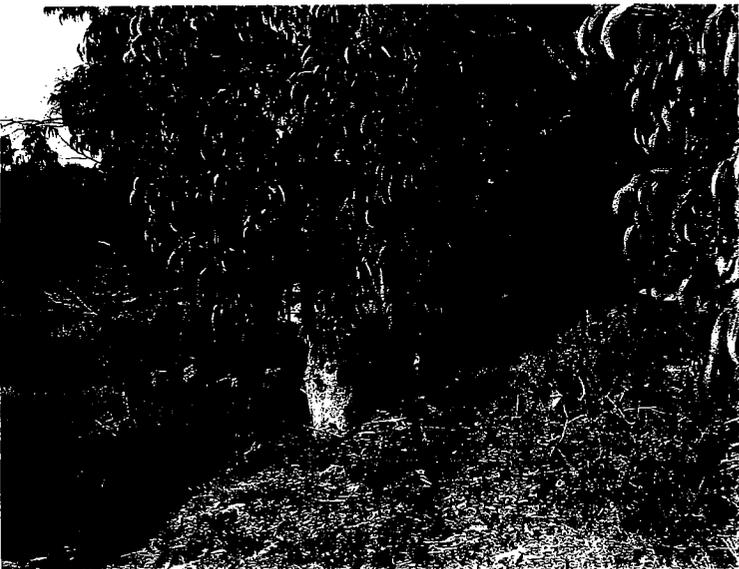
Eucalyptus trees on levee, railroad grade, and adjacent private property.



Recently fallen sapling on bank of slough. Larger tree in background
fell across slough, bridging from east bank to levee.



Closeup of eucalyptus on levee. High tide in the slough inundates
the base of the tree.



Project Area

Giacomini Wetland Restoration Project

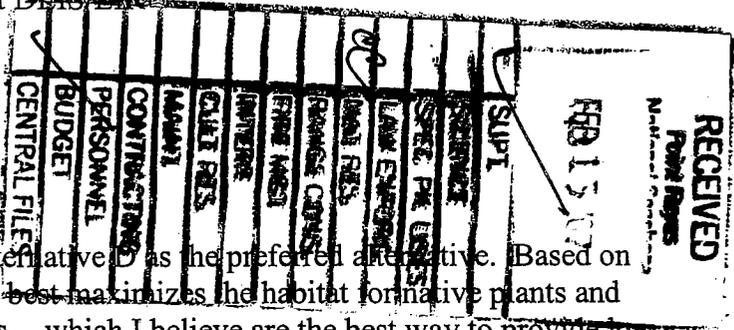


Detail from Project Area map, Giacomini Wetlands project EIS / EIR with emphasis added to pinpoint area of invasive plants on berm and historic railroad grade



Current Google Earth imagery showing eucalyptus on Tomasini Creek berm and Point Reyes Mesa bluff. Martinelli tract at upper left; Overlook Road mid right.

ATTN: Superintendent
Giacomini Wetland Restoration Project DEIS/EIR
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956



Dear Don,

I am writing to support selection of Alternative D as the preferred alternative. Based on the alternatives offered in the DEIR, D best maximizes the habitat for native plants and wildlife, and D provides **viewing areas** -- which I believe are the best way to provide low impact public access, consistent with a sound environmental educational message.

My remaining comments are aimed at strengthening the definition of D to

- Assure that D is the best environmental alternative
- Assure that public access in D is satisfactory, and at least from some perspectives, superior to the other options
- Improve the evaluation of alternatives to fairly consider Alternative D.

Add an ADA compliant trail to Alternative D

Probably the most important and easiest way to enhance Alternative D is to put in the ADA compliant access included in alternative A. D already includes the Dairy Mesa viewpoint. To enhance D use the option as defined in A: " A decomposed granite trail that would be compliant with the Americans with Disabilities Act would be constructed from C Street in the vicinity of 3rd Street along an easement to the edge of the Dairy Mesa, where there would be a viewing area to allow the public to experience and enjoy the restoration project and views of Tomales Bay... This viewing area would consist of simple facilities such as benches, picnic table, and interpretative exhibits." (page 49)

Alternative D is faulted for lack of ADA-compliant access in several places where the alternatives are compared:

Criterion 5 of section 101(b) and 102(1) - "Alternative C would appear to offer the best benefits ... **including an ADA-compliant access component**" (see page 96)

The Preferred alternative selection: "Alternative C offers the best combination of restoration and public access benefits ... and **incorporates an ADA-compliant access component.**" (see page 96)

Table 1: Incorporate opportunities for the public to experience and enjoy the restoration process – In alternative D "there would be no through-trail or **ADA-complaint access components**" (see page 99)

Those statements are an unfair evaluation since it is easy to add an ADA-compliant component to D without sacrificing the environmental benefits of D.

Impacts of spur trails and a through trail

There is much discussion in the DEIR about the desirability of having spur trails and a through trail. Many people would like spur trails and many would like to ride bikes from Inverness to Point Reyes Station. But, these desires do not enhance the restoration and they are not necessary for the public to experience and enjoy the restoration process.

Despite all the attention given to spur and through trails in the DEIR, the negative impacts of the recommended trails are omitted or the discussion is incomplete. Here are some of the impacts that should be considered in the final EIR:

Dogs in the wetlands and buffer areas. Where there are trails, there will be some who abuse the privilege and let their dogs, even encourage their dogs, to disturb wildlife and some dogs will carry diseases into wildlife habitat.

Disturbance occurs along trails especially ones that combine multiple modes of travel

Habitat is directly impacted by trails and their maintenance. Most of the spur trails intrude in the SCA riparian areas protected in the LCP (There is no discussion that I could find of this conflict of Alternative C and D with the LCP).

I object to the portion of the south perimeter trail included in both alternative C and D. (Creation of Southern Perimeter Spur Trail from Point Reyes Station to Location of Former Summer Dam including a new entrance area at Green Bridge County Park). This area has riparian habitat and has the potential for improved riparian habitat and associated buffer zones. This area should be restored for maximum habitat value and flood protection values. Planning the south perimeter trail through here I think violates the guideline on the project's purpose: **"public access opportunities should not conflict with the project's purpose of restoring natural hydrologic and ecological processes and functions"** (page 30)

About two thirds of that south perimeter trail along the east pasture falls within the SCA/LCP riparian zone and the graded entrance area is entirely located within scrub-shrub riparian habitat, designated as CDFG Riparian (see figure 34). Degrading these riparian areas is not discussed anywhere in the DEIR, so far as I could see.

What is appropriate and satisfactory public access?

Viewing areas will allow people to enjoy and experience the restoration without intruding into it. An associated interpretive message can reinforce the need to protect wildlife and habitat, and minimize disturbances.

If the spur trails are eliminated from Alternative D, public access still will be available at three viewing areas:

- Easy access at the west end of the existing north levee
- Hike in, trail access to a viewing area along the existing Tomales Bay Trail at the top of Railroad Point
- Dairy Mesa viewing area (with ADA-compliant access as discussed in this letter)

These access points and trails satisfy the objective of the project: "The Park Service and the CSLC have committed to incorporating opportunities for the public to learn about the value of wetlands, the problems facing Tomales Bay, and the restoration process through trails, viewing areas, interpretative exhibits, and volunteer/educational opportunities."

(Page 12)

Excavation of the south west corner of the east pasture

Alternative D includes a restoration step titled: Excavation of Southwestern Portion of East Pasture to Intertidal Elevations (Figure 16). This step appears to reach the limit of diminishing returns. 50,000 cubic yards would be excavated to convert 8.4 acres of grassland to tidal marsh. This spot will likely be inundated anyway as the sea level rises due to global warming. The excavation seems to offer a low return in a project restoring more than 350 acres of low-, mid- and high Tidal Salt Marsh (acreage from page 546).

Alternative D is supposed to describe the Environmentally Preferred Alternative, yet Alternative D is faulted for this excavation. See the comments comparing Alternative C and D; e.g. Alternative C " provides other environmental benefits by decreasing the amount of excavated sediment that would be disposed of off-site and thereby minimizing impacts on air quality, demand for non-renewable energy resources, and traffic in the local community and region." (Page 96) This fault in D is sprinkled through the evaluation in the same way that lack of ADA-compliant access is touted.

For the final EIR, I would expect the project planners to decide if the excavation is worth the effort. If it is, then it should be included and not listed as a negative. If it is not worth the effort because of the damaging side effects, then remove it from the environmentally preferred Alternative D. (Here is a similar kind of trade off to illustrate the process: Round-up would be a great way to kill invasive plants, but it would have terrible side effects in this wetland restoration.)

Starter channel

Alternative C includes a good restoration item: " Creation of New Lagunitas Creek Tidal Channel (Create Tidal Channel; Figure 14)" I did not understand why that is not included in Alternative D, too.

Another Starter Channel

Alternatives B, C and D include a restoration step of "Removal of Riprap and Regrading of Creek Bank in southern portion of East Pasture (Remove or Breach Levee; Figure 11)" Since this is an area where the creek will rise over the bank, and hydrologists have debated whether Lagunitas Creek will "dramatically change course in the future by cutting through the East Pasture in this location." (page 56). Creating a starter channel here might be a win win step which creates flood reduction benefits and environmental benefits (more area for riparian habitat, some seasonal wetlands, and isolation of important riparian and buffer areas from disturbance). I don't know what the right size would be, but I imagine a 100 foot wide swale graded and planted with willows and alders, at around 10' NAVD88 and running west until the slope takes over. One of the objectives of the DEIR is stated as "emphasis was placed on those alternatives that would create the most sustainable and dynamic ecosystems." (page 30)

More Island-like Refugia

The DEIR describes high tide refugia of 1.1 acres at the north levee (page 36). This will be highly valuable habitat since shore side high tide areas are more subject to disturbance by land predators and human caused factors. I found it remarkable that the fill for the refugia had to be mitigated with wetland creation in a project that is creating about 350 acres of new salt marsh. low-, mid- and high Tidal Salt Marsh.

If 1.1 acres is appropriate for the existing salt marsh by the north levee, how much isolated refugia area is needed for the whole 350 acre salt marsh restoration? There are planned refugia on berms in the project, but there are no additional isolated, island-like refugia. If another 5 acres of such refugia were created, perhaps more excavated fill can be used on site, and valuable habitat can be created.

Figures and Tables in Chapter 4

It is difficult to follow the changes under the different alternatives. Chapter 3 has extensive figures and tables on existing conditions. There are no figures in Chapter 4 illustrating what the restoration might be like. The tables that are in Chapter 4 show summary qualitative descriptions such as "major beneficial". But, it is hard to make before and after comparisons when the data is scattered in the text.

Some of the ones that might be useful are listed here

Table 10 shows acreage of most dominant vegetation type. There should be such a table for each alternative.

Table 14 shows the estimated frequency of flooding and vertical flood elevation for key locations. There should be such a table for each alternative.

A version of Figure 28 for estimating the height of the southern end of the east pasture after restoration.

I realize that the models have much uncertainty, but the text says that the conclusions are based on maps and predictions. "Analysis of potential changes in cover or areal extent of native vegetation communities with implementation of the various alternatives is based on maps that predict long-term changes in vegetation communities in the Project Area once equilibrium, or, more accurately, dynamic equilibrium conditions have been reached." (See for example, page 453)

Thank you for considering my comments. The DEIR contains excellent information and analysis. The project team should be commended for their work. I appreciate the opportunity to participate.

Sincerely,

Rick Johnson
PO Box 981
Inverness, CA 94937

Point Reyes National Seashore
Giacomini Wetland Restoration Project Meeting
January 25, 2007



Please add any additional issues that were not brought up at this meeting:

I want to put my 2-bits behind Plan "C" —
I think "D" is too radical — all the earth-
moving will impact the environment detrimentally
as much as any restoration value it will
achieve. BUT "C" is great! Thanks
Tom Killion — 51 Laurel, I.P. (PRS, 94956)



Richard Kirschman
 <kirschman@marincoun
 ty.net>
 02/12/2007 11:52 AM
 PST

To: "Frederick Smith, Jr., Environmental Action Committee of West Marin"
 <eac@svn.net>
 cc: pore_planning@nps.gov
 Subject: EAC Announcement: Giacomini Restoration Plan Letters Due by
 Tuesday 2/14

Fred,

The more public access the better. Access is very educational. Compared to the current status of these lands, either alternative "C" or "D" represents a gigantic step in the right direction.

Richard Kirschman

On Feb 9, 2007, at 2:12 PM, Frederick Smith, Jr., Environmental Action Committee of West Marin wrote:

> Dear Richard,
 >
 >
 > This is Fred at the EAC reminding you that written letters on the
 > Tomales Bay Wetlands Restoration project on the old Giacomini ranch
 > are due by this Tuesday, February 14.
 >
 > The EAC is excited to see Point Reyes National Seashore's support for
 > extensive restoration of the wetlands at the south end of Tomales Bay
 > for the benefit of wildlife, including Coho salmon that spawn in
 > Lagunitas and Olema Creeks. No matter what the outcome, the wetlands
 > will be restored!
 >
 > But we are concerned about the Park's support of Alternative C, which
 > calls too much public access at the expense of wildlife. The EAC
 > supports Alternative D because it is the Environmentally Preferred
 > alternative that provides for the most extensive restoration of the
 > Tomales Bay wetlands. Also, please include in your letter whether you
 > think that the bridge over Lagunitas Creek and trail connection
 > between the Green Bridge and the White House Pool is a good idea.
 >
 > Remember, if the Seashore does not get enough support for Alternative
 > D, we could end up with a restoration plan that includes too many new
 > access-related impacts. So please write your letters in support of
 > Alternative D to the address or e-mail below.
 >
 > Remember, we'll only end up with a plan we like if we ask for it.
 >
 > The Park is accepting written letters on this proposal until next
 > Tuesday February 14. Please send your letter or e-mail to:
 >
 > Don Neubacher, Superintendent
 > Point Reyes National Seashore
 > Point Reyes, CA 94956
 > Attn: Giacomini Wetlands Restoration Project
 > E-mail: pore_planning@nps.gov
 >
 > For more information on the plan, go
 > [http://www.nps.gov/pore/parkmgmt/
 > planning_giacomini_wrp_eiseir_draft_2007](http://www.nps.gov/pore/parkmgmt/planning_giacomini_wrp_eiseir_draft_2007)
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> Thank you all for your support of the EAC of West Marin.
>
> For Truth, Justice and the Riparian Way.
>
> Fred Smith
> Executive Director
>
>
> --
> Frederick Smith, Jr.
> Executive Director
>
> Environmental Action Committee of West Marin
> Protecting West Marin since 1971
> Box 609
> Point Reyes Station, CA 94956
> tel: 415-663-9312
> fax: 415-663-8014
> email: eac@svn.net
> <http://www.eacmarin.org>
>



"Jane Kriss"
<janekriss@gmail.com>
02/12/2007 11:58 AM
PST
Please respond to jane

To: pore_planning@nps.gov
cc:
Subject: Giacomini Wetlands

Don Neubacher, Superintendent
Point Reyes National Seashore
Point Reyes, CA 94956

Dear Don:

I'd like to weigh in on the Giacomini Wetland restoration project. I fully support Alternative D, since I would like to see the maximum amount of restoration possible. Horses and dogs especially do not belong in the wetlands or near the creek, and there would be a major enforcement challenge if a path were there ostensibly for people only. It's delicate, precious habitat, that we have the opportunity to save for the species that need our protection. Walking and biking paths (and we need both...) should be addressed as a separate issue, away from the waterways.

Sincerely,
Jane Kriss
Inverness resident

--
Jane Kriss
415.669.7331
www.janekriss.com

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Rhonda Kutter
 <rikutter@horizoncable.com>

02/13/2007 10:35 PM
 PST

To: park_planning@nps.gov
 cc:
 Subject: Giacomini Wetlands Restoration Plan

RECEIVED
 Point Reyes
 National Seashore

FEB 14 '07

Rhonda Kutter
PO BOX 876
Point Reyes Station, CA 94956
415.663.5451

February 13, 2007

Superintendent Don Neubacher
 Point Reyes National Seashore
 Point Reyes Station, CA 94956

Subject: Giacomini Wetlands Restoration Plan

Dear Superintendent Neubacher:

I am the Chairmen of the Committee for a Family-Friendly Point Reyes (CFFFPR). This organization was formed over a year ago and our primary goal has been to get a toddler playground in PRS-- it is scheduled to start perhaps as early as this spring as part of the County Restroom and Parking lot project. We are also actively persuing improving and expanding local walkways make them safer for everyone, especially children, parents with toddlers and strollers, and also the less abled.

I was very sorry that I could not attend the Park's Public meetings regarding the Giacomini Wetlands project. As a working parent of a five year old, evening meetings are a challenge--and illness prevented me from attending the last meeting, so my letter will be of a general nature, since I am not as familiar with all of the nuances of the various plans. I do appreciate all the time that has gone into investigating the various plans, as is apparent from all of your work.

Though I am not officially representing the CFFFPR (we haven't had a need for a meeting recently) I would like to speak for many parents like myself, who live or visit Point Reyes Station on a regular basis for work, pre-school, school or shopping, and are disappointed that there are few suitable walks for parents with young children right here in town. The few we have are very short and the one public trail by the green bridge, as it is, is not safely accessible. Improving the pedestrian access by the green bridge and along Levee Rd. is an important task and should be done no matter what happens in the Wetlands project.

Although I am an active member of the Point Reyes Village Association, and know the design review committee has studied this far more than I, I would still like to see more pathways than they are recommending. Alternative C's Southern Perimeter Trail is something I have always dreamed about. How I would love to have a bridge to cross to White's Pool! And wouldn't it be wonderful to have two trails--on the Wetland's side that was geared more to pedestrians (and

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perhaps equestrian too), and then have the bike access be part of the Levee Rd. widening project (or visa-versa)?

I do not have a strong opinion about the Mesa Spur Trail. However, I can see that if the Wetlands become a popular destination, it might be useful to have an parking area and entrance set aside for it, but I would like to see that be closer to town, if possible. As someone who frequently crosses Mesa Rd. at Lorraine, I find it can be a bit dangerous as it is--a lot of car travel too fast and increased use could make this even worse. I would like to see this part of the plan put on hold for now--perhaps it could be developed later if need be.

I like the idea of a dairy overlook with ADA access from town. The Point Reyes Station Village Association's suggestion of moving the access point to C Street seems well thought out to me. There is also interest in our community through the new West Marin Common's Group to improve the walkways/sidewalk along C Street to Highway One--which would make this approach even more inviting. It could also connect and attract visitor's more to the Dance Palace part of our town, which is a jewel often missed by first time guests to our village.

Thank you for you time. I hope my thoughts have been helpful.

Sincerely,

Rhonda Kutter