

## **Organization Comments**

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# California Native Plant Society

February 9, 2007

Don L. Neubacher, Superintendent  
Attn: Giacomini Wetlands Restoration Project  
Point Reyes National Seashore  
1 Bear Valley Road  
Point Reyes Station, CA 94956

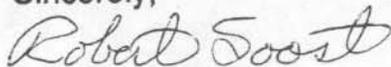
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Dear Superintendent Neubacher,

The Board of Directors, Marin Chapter, California Native Plant Society (CNPS), strongly supports the adoption of Alternative D. We do so because it provides the basis for the most complete restoration and continued protection of the area included within the proposed project. Alternative C also provides almost equal recovery, but the inclusion of a possible transportation corridor from Inverness Park to Point Reyes Station could result in unwanted intrusion into sensitive areas. Alternatives, A and B as well as the No Action alternative do not provide adequate recovery. If the preferred Alternative C is adopted, measures should be taken to protect the area from off trail public intrusion.

We note that under Alternative C and D considerable quantities (160,000 cubic yards for Alternative D) of surplus soil are scheduled to be deposited in old quarries located on Tomales Point within Point Reyes National Seashore. Some of these quarries have CNPS listed plant species on their immediate borders. Protection of these species during soil disposal and subsequent monitoring for invasive plant species should be provided.

Sincerely,



Robert Soost  
Board of Directors  
Marin Chapter, CNPS



Dedicated to the preservation of California native flora



**Brannon Ketcham**

01/25/2007 11:20 AM PST

To: Lorraine Parsons PORE/NPS@NPS  
cc:  
Subject: Fw: EAC Announcement: Giacomini Restoration Plan - Public meeting tomorrow night.

Brannon Ketcham  
Hydrologist,  
Point Reyes National Seashore  
Point Reyes Station, CA 94956  
(415) 464-5192

----- Forwarded by Brannon Ketcham PORE/NPS on 01-25-2007 11:19 AM -----



**"Frederick Smith, Jr.,  
Environmental Action  
Committee of West  
Marin" <eac@svn.net>**

01/24/2007 03:21 PM PST

To: brannon\_ketcham@nps.gov  
cc: kabk@comcast.net  
Subject: EAC Announcement: Giacomini Restoration Plan - Public meeting tomorrow night.

Dear Brannon and Kathleen,

Happy 2007 to all of you.

First let me say how happy I am to be your new Executive Director at the EAC of West Marin. I only started my new position a few weeks ago but I already feel comfortable thanks in part to all of the support I have received from the EAC membership. In particular, I'd like to thank our board members who put their heart and energy into helping to protect the best of West Marin for ourselves and future generations to enjoy.

In this light, the National Seashore's Giacomini Wetlands Restoration Project proposal is out for public review and 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.

The EAC supports Alternative D with one modification, because it is the alternative that provides for the most extensive restoration potential. We support modifying Alternative D to include a bridge over Lagunitas Creek, which would connect the existing levees paths on either side. This will create a continuous, low-impact trail between the White House Pool parking lot and the Green Bridge.

Please attend the Seashore's public meeting tomorrow evening, Thursday, January 25th at 6:30 p.m. at the Park Headquarters' Red Barn Classroom to inform the public and get input on the plan.

The EAC believes that the Seashore's preferred Alternative C, while a great step in the right direction, is not the best option for a full restoration of the wetlands. Alternative D, with the addition of the bridge over Lagunitas Creek, is the best plan to fully restore the wetlands and improve public access.

For more information on the plan, go to:  
[http://www.nps.gov/pore/parkmgmt/planning\\_giacomini\\_wrp\\_eiseir\\_draft\\_2006.htm](http://www.nps.gov/pore/parkmgmt/planning_giacomini_wrp_eiseir_draft_2006.htm)

The Park is accepting written letters on this proposal until February  
14. Please consider sending a letter or e-mail to:

Don Neubacher, Superintendent  
Point Reyes National Seashore  
Point Reyes, CA 94956  
Attn: Giacomini Wetlands Restoration Project  
E-mail: [parkplanning@nps.gov](mailto:parkplanning@nps.gov)

Thank you all for your support of the EAC of West Marin.

For Truth, Justice and the Riparian Way.

Fred

--  
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](mailto:eac@svn.net)  
<http://www.eacmarin.org>



"Frederick Smith, Jr."  
 <eac@svn.net>  
 02/14/2007 04:18 PM  
 PST

To: pore\_planning@nps.gov  
 cc:  
 Subject: Attn: EAC's Giacomini Wetland Restoration Project Comments

Hello,

Thanks for the opportunity to comment on behalf of the Environmental Action Committee of West Marin. Our comments are attached and pasted below.

Sincerely,

Frederick Smith



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February 14, 2007

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

Attn: Giacomini Wetlands Restoration Project

Dear Superintendent Neubacher,

Thank you for the opportunity to comment on the Giacomini Wetland Restoration Project Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR). The Environmental Action Committee of West Marin (EAC) wholeheartedly supports Point Reyes National Seashore's (PRNS) effort to restore much of the Giacomini Ranch property and Olema Marsh (herein known as Tomales Bay Wetlands) to their natural state. PRNS staff and financial contributors should be commended for the amount of time and effort put into making this restoration project a reality.

After careful thought and consideration, the EAC supports Alternative D because it is the best alternative to ensure the largest restoration potential for the Tomales Bay wetlands and the watershed. Alternative D is the Environmentally Preferred Alternative in the DEIS/DEIR for the reason that it 1) provides the most extensive restoration of the system and 2) minimizes future adverse effects to birds, salmon and other wildlife species from the baseline of natural habitat

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February 14, 2007

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

Attn: Giacomini Wetlands Restoration Project

Dear Superintendent Neubacher,

Thank you for the opportunity to comment on the Giacomini Wetland Restoration Project Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR). The Environmental Action Committee of West Marin (EAC) wholeheartedly supports Point Reyes National Seashore's (PRNS) effort to restore much of the Giacomini Ranch property and Olema Marsh (herein known as Tomales Bay Wetlands) to their natural state. PRNS staff and financial contributors should be commended for the amount of time and effort put into making this restoration project a reality.

After careful thought and consideration, the EAC supports Alternative D because it is the best alternative to ensure the largest restoration potential for the Tomales Bay wetlands and the watershed. Alternative D is the Environmentally Preferred Alternative in the DEIS/DEIR for the reason that it 1) provides the most extensive restoration of the system and 2) minimizes future adverse effects to birds, salmon and other wildlife species from the baseline of natural habitat conditions, not the present, altered state off the land.

The EAC *opposes* the pre-fabricated bridge over Lagunitas Creek advocated for in Alternative C and, thus, the southern Perimeter Trail as proposed in the DEIS/DEIR. While this public access component initially made sense on a conceptual level, more careful study reveals that the sheer size of the bridge that would be required, trail maintenance/construction requirements and increased human use in this area could have negative effects upon wildlife use and the restoration potential of the area. Perhaps there will be opportunities in the future to build a trail connection between the Green Bridge and White House Pool via the levee road corridor. The Lagunitas Creek watershed has already incurred serious damage upstream due to intense human development inside the stream buffer. We believe that future incursions to the streamside setbacks should be minimized and, if possible, completely avoided.

While Alternative C provides many of the ecological benefits in Alternative D, large potential increases in human use adjacent to Tomocini and Lagunitas Creeks, could negatively affect habitat use and quality. The fact is there are already abundant human access points in Point Reyes National Seashore and within a few miles of the project area. While improved access in the project area should be an important consideration, it should not intrude upon the natural restoration of the Tomales Bay wetlands and Olema Marsh.

One thing that is missing from the DEIS/DEIR analysis is the potential effects of public access to wildlife and ecological resources from a baseline of naturally occurring habitat conditions, rather than its current altered state. Utilizing the DEIS/DEIR's analysis alone, it is difficult to assess the real, continuous impacts of increased human use and trail intrusion into what could eventually be a naturally restored wetland system free from intense human presence. Please consider including an analysis in the Final Environmental Impact Statement/Report that looks at baseline conditions for these habitat types and assesses the effects of increased human use upon wildlife and maintenance funding concerns. This will help the public understand how PRNS' support of Alternative C ensures that future human activities in the project area are in harmony with the area's irreplaceable wildlife, scenic and other natural resources.

Also, please consider changing the name from the Giacomini wetlands to the Tomales Bay wetlands, as the ranch itself is the impediment to recovery, not its solution. Considering that this project stands to restore up to 50% of Tomales Bay's wetlands, it doesn't sound unreasonable that it should be named after the bay. The new name is also supported by a wide cross section of the local populace.

In conclusion, thanks you for your dedication to making this restoration process a reality. It is truly one of the biggest legacies of your time as PRNS Superintendent. It both excites and gives me hope that natural resource management in the United States is on the right track. This restoration project is a role model to the United States and the world.

Sincerely,



Frederick M.R. Smith, Jr.  
Executive Director

**Collaborative Comments by the Marin County Bicycle Coalition, the Community Pathways Committee, the Sierra Club, Access4Bikes, and Transportation Alternatives for Marin on the Giacomini Ranch Wetlands Restoration Project DEIR**

February 14, 2007

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

(This letter is also being postmarked and mailed today)

Attention: Giacomini Wetlands Restoration Plan

Subject: DEIR comments

Dear Superintendent Neubacher:

The Marin County Bicycle Coalition, in partnership with the Sierra Club, the Community Pathways Committee, Access 4 Bikes, and Transportation Alternatives for Marin have reviewed the DEIR for the Giacomini Ranch Wetlands Restoration Project and respectively request that the National Park Service (NPS) choose the following as its plan for the restoration: :

**We recommend Alternative D with the addition of the Southern Perimeter Path as noted in Alternative C and with the following additional considerations:**

1. The multi-use pathway should extend all the way from Point Reyes Station to Inverness Park and on to the North Levee.
2. The pathway should provide a safe, stable, permeable surface for bicycle and pedestrian use, such as is provided by decomposed granite with a pine resin binder.
3. Funding for the public access portion of the project should be secured concurrently with the restoration funds, and should be installed simultaneously.
4. Design, funding and maintenance of non-NPS-owned land should be agreed to in advance through a Memorandum of Understanding between the NPS and the County of Marin (on whose lands the path will occur).

Throughout the past three years of public comment on this issue, NPS has seen tremendous support for the Southern Perimeter Path from local residents. The idea of a path in this area has a long history in West Marin, dating back more than 30 years to the formation of the West Marin Paths group in the late 1970's.

This new path will link residences with schools and public services such as the post office and library, and with local businesses, making it possible for people to travel safely between Point Reyes Station and Inverness Park without walking or riding along narrow country roads.

Environmental stewardship, walking and bicycling go hand-in-hand. The more opportunities people have to walk and bike rather than drive, the more we reduce air pollution, water pollution and runoff from parking lots and roads in our fragile local ecology

The Southern Perimeter Path will allow bike/ped access along the wetland's perimeter, as well as provide viewpoints for birding and observation of the newly restored wetland. In this way, the path will expand NPS's ability to provide public access to the publicly-owned wetlands.

The Marin County Bicycle Coalition and its partners respectfully ask the NPS to make intermodal transportation between Point Reyes Station and north of Inverness Park a reality by including the Southern Perimeter Trail in the Final EIR, along with a pledge to secure the funding for the project, and to work concurrently with the County of Marin on an MOU. This collaborative agreement will improve public safety, help reduce motor vehicle trips (which degrade wetlands,) and help fulfill an NPS mission of providing public access to its lands.

Signed:

Kim Baenisch  
Executive Director  
Marin County Bicycle Coalition  
P.O. Box 1115  
Fairfax, CA 94978

Gordon Bennett  
Chair, Marin Group  
The Sierra Club

Dona Larkin  
Community Pathways Committee  
Pt. Reyes Station, CA  
94956

Alex Burnham  
President  
Access 4 Bikes  
P.O. Box 526  
Pt. Reyes Station, CA  
94956

Patrick Seidler  
President  
Transportation Alternatives for Marin  
187 E. Blithedale Avenue  
Mill Valley, CA 94941

Cc: Steve Kinsey, Marin County Fourth District Supervisor  
Farhad Mansourian, County of Marin Public Works Director  
Congresswoman Lynn Woolsey  
Senator Barbara Boxer  
Senator Dianne Feinstein  
Assemblyman Jared Huffman  
Senator Carole Migden

# Point Reyes Lodging Association

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2/13/07

ATTN: Superintendent: re. Giacomini Wetland Restoration Project DEIS/EIR

Point Reyes Lodging is a group of seventeen professional lodging properties in the Point Reyes area. As residents of the area and hosts to visitors year round to the Point Reyes National Seashore area we would like to provide input on the selection of a preferred option for the Giacomini Wetland Restoration Project.

Because many of our guests are interested in visiting and experiencing the natural beauty of the area we support an option that would provide the most access for viewing and interacting with the wetland area. Options A & B provide the most public access. Option C, while not including the Eastern Perimeter trail on the railroad right of way does include the connection bridge at White House Pool and the option for extending the Southern path to Inverness Park.

Point Reyes Lodging urges the park to include public access that includes both viewing the wetland area and helping to create a network of paths off-road between our communities and urges the park to take into consideration the environmental benefits of providing an alternative to driving motor vehicles around the wetland area and between communities.

Thank you for consideration on this matter.

Sincerely,  
Point Reyes Lodging  
PO Box 878  
Point Reyes Station, CA 94956  
415-663-1872

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Point Reyes Station Village Association  
P.O. Box 476  
Point Reyes Station, CA 94956

February 12, 2007

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

Subject: Giacomini Wetlands Restoration Plan- Comments on Draft EIS/EIR

Dear Superintendent Neubacher:

The Point Reyes Station Village Association is a community forum for considering land use proposals in the Point Reyes Station area. Through our Design Review Committee, we regularly provide comments on local development matters to the County of Marin and other agencies. Our comments are guided by the Point Reyes Station Community Plan of 2001.

We agree with the references and interpretations of the Community Plan made in the draft EIS/EIR. One goal of the Community Plan that is particularly relevant for the project deserves repetition here. It is the goal of protecting the residential uses, next to commercial and public uses, in the historic downtown area of Point Reyes Station. If residential use is driven out by increased traffic, parking, noise and litter, the unique character of our town will be lost. We appreciate the attention shown to this issue in the draft EIS/EIR, but much of the detailed planning of the park-town interface must await the outcome of the proposed land exchange of parcels along C Street.

Two minor corrections should be made: In some places, the year of the Community Plan is given as 2000. It should be 2001. The reference to the zoning designation of the parcels on C Street (for instance, in the text on page 615), is incorrect. The zoning C-R-A:B-2 translates into Coastal Residential, Agricultural (10,000 sq. ft. minimum lot size), not into "Commercial/Residential", as stated.

We have followed this project from its inception and have previously commented on various aspects of it. Information contained in the draft EIS/EIR has caused us to rethink some of our earlier comments, and to confirm others.

As a result of our review, **we support Alternative D**, the environmentally preferred alternative. Our specific comments on the proposals in the Draft EIS/EIR are as follows:

1. **Restoration Measures**. We support the restoration measures described in Alternative D. The two main differences between C and D are (a) excavation to inter-tidal elevations in the southern portion of the east pasture, and (b) improvement of creek flow from Tomasini Creek by various measures. Taking the

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long view, we find that the 20% increase in excavation volume (from 200,000 cubic yards in Alternative C to 251,000 cubic yards in Alternative D) is acceptable. The advantages of Alternative D by better integrating Tomasini Creek into the restoration are stated in the letter from Jules Evens, which we incorporate in our letter.

2. **Public Access.** We support the limited public access resources provided in Alternative D, i.e., no bridge connection between the existing southern perimeter footpath and the County's White House Pool trail, and no Mesa Spur Trail. Our specific comments on public access resources are as follows:

*Southern Perimeter Trail (contemplated in Alternative C).* As a concept, a safe trail connection between Point Reyes Station and Inverness Park is popular and reasonable. Upon closer examination of the surrounding facts, however, we are unable to support the actual trail being proposed. Our opposition to the trail is based on the following considerations (listed not necessarily in the order of priority):

- Length and height of bridge and its estimated cost are excessive in relation to the proposed use.
- Introduction of man-made structure into area currently open and devoid of man-made structures (other than the levee berms which are to be removed).
- Impacts on scenic views from White House Pool and other points.
- Potential for future changes in natural channel of Lagunitas Creek and consequent need to regulate creek flow to fit the bridge instead of encouraging natural creek flow.
- Question whether the proposed trail would significantly contribute to reduced automobile use, given that it is less than one mile long and that there are few potential users that live close to the trailhead at either end.
- View that money and other resources necessary for the bridge and path would be better spent on improving Levee Road which would benefit more people. (The reasons given on page 88 of the EIS/EIR for eliminating the alternative of "Routing the Proposed Southern Perimeter Through-Trail over the Green Bridge" strike us as unpersuasive, because even if the concerns stated were raised by local residents, they are inherently not logical. Widening the shoulder of Levee Road would increase, not decrease public safety along that road, and would not generate additional traffic and noise in Point Reyes Station.)

- If the trail improvement and construction of the bridge were proposed on private property or on state or County-owned land, it would violate the County's policies on streamside conservation areas, because there is the reasonable alternative of using Levee Road. While technically exempt from these rules, the Park Service should be held to the same standard.

It seems clear that improving the existing bridge and road would have fewer impacts on the environment than the proposed through-trail and would benefit more people. We intend to initiate a broadly based, community-wide effort, working with county and state agencies, to bring about improvements to the Green Bridge and Levee Road that make them safe for non-motorized transportation.

***Mesa Spur Trail (contemplated in Alternative C).*** As mentioned above, we do not support the Mesa spur trail and overlook (near the duck club) proposed in Alternative C. The Mesa spur is an out-of-the-way location the use of which would be difficult if not impossible to police. If opened to public access, this location could easily turn into an attractive nuisance generating trash and unsanitary conditions, as well as noise and other conflicts with the residential uses above the trail. Vehicular access to the existing road to the duck club should be blocked with a simple gate to prevent illegal dumping of trash etc. The use of the existing utility parking area by local landscaping businesses could be continued under lease if this use is compatible with the wetland restoration in this location. Alternative sites for ADA access are mentioned below.

***Trailhead at Green Bridge.*** We support the proposal to create improved trail access at the Green Bridge. We hope to be included in the planning process for the details of this proposal. We support the blocking off of direct access from the wetland trail to Third Street.

***Dairy Overlook; ADA Access.*** It occurs to us that ADA access to the dairy overlook may be possible via a direct path from C Street (from a point between Fourth and Sixth Streets) if the Park Service retains ownership of its land along C Street or retains a road easement connecting C Street to the park land below. This more direct access from downtown would increase the enjoyment of the overlook by local residents and visitors and, if properly planned, including signage, would avoid the overloading of Third Street which is our major concern. In addition, ADA access could be created at the White House Pool County Park parking lot.

Thank you for considering our comments.

Respectfully submitted by

*Wiebke Buxbaum*  
Wiebke Buxbaum,

Chairperson of the Design Review Committee



## SIERRA CLUB MARIN GROUP

COASTAL SECTION C/O GORDON BENNETT

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

February 12, 2007

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

Re: Point Reyes National Seashore (PRNS)  
Giacomini Wetland Restoration Project (Project)  
Environmental Impact Statement / Report (EIS/R)

**The Sierra Club, on behalf of its 7,000 Marin County members, wishes to support Project Alternative D, which the EIS/R identifies as the "Environmentally Preferred Alternative" but modified as follows:**

SW corner of East pasture

We suggest that Alternative D might be modified to excavate the SW corner of the East pasture only to the extent that it may enhance the adaptively managed restoration of the Olema Marsh. We acknowledge that returning the entire area to historic conditions is both impractical and futile due to upstream land uses. So we do not support the full excavation as proposed in Alternative D, since it seems that the cost/benefit ratio is high and we believe that the money could be used to more effective purposes (perhaps to purchase adjacent properties for restoration).

Nevertheless, the adaptively managed restoration of Olema Marsh does pose a conundrum since it has high value yet it may be negatively impacted if this SW corner of the East pasture is only "scraped" as Alternative C suggests rather than excavated as in Alternative D. However, the Giacomini Marsh Restoration is due to flood the area before the Olema Marsh project is completed. If there is any chance that a fuller excavation of this area in the SW corner could enhance restoration of Olema Marsh, then the only reasonable time to excavate would be as part of the earlier Giacomini Marsh Restoration.

Thus our request that this area be analyzed for its potential to contribute to the Olema Marsh Restoration and excavated in advance on the expectation that a full restoration of Olema Marsh will be possible and to the extent that such excavation would materially contribute to the Olema Marsh Restoration.

## Tomasini Creek

We also support the full restoration of Tomasini Creek as proposed in Alternative D but again we question the cost/benefit ratio of moving a creek into its historic channel when that is likely to happen on its own. This money might be better spent on more wetland restoration rather than historic channel restoration.

Furthermore, another major expense in the larger culvert. In all other cases, we would likely support a larger culvert that would allow a more natural and fuller connection between flows upstream of the culvert and those downstream. In this case, however, we have upstream the former West Marin Landfill, whose inevitable failure will discharge leachate into Tomasini Creek. From this perspective, a smaller culvert may trap some of the high flows behind the culvert where they may drop out instead of being conveyed directly to the Giacomini Marsh with high flows that a large culvert might enable.

In summary, the former landfill strongly suggests the benefit of as much wetland as possible in the Tomasini "Triangle" and upstream, where more extensive Tomasini wetlands can filter out toxics as much as possible before they enter the Giacomini wetlands or are conveyed directly into Tomales Bay.

## Access Points

The Sierra Club supports Alternative D's elimination of the Mesa spur trail / viewing area (near the hunting lodge) as proposed in Alternative C. We believe this would create an attractive nuisance that would conflict with nearby residences above the trail, as well as needlessly impact wildlife. We support Alternative D's proposed Dairy Overlook (modified to be ADA compliant) via a direct path from C Street, which we believe could avoid both wildlife impacts and traffic impact to Third Street.

We also suggest that Alternative D be modified to eliminate the proposed spur trail extending from Railroad Point south on the Right of Way (RoW). In the opinion of the Sierra Club, by a pathway on the RoW, which runs through sensitive riparian/ wetland areas, would clearly impact restoration values. The Sierra Club has previously defended this Mesa buffer from incursion by the Writers Refuge Cabins. However, we acknowledge the desirability of pathway access from the town of Point Reyes Station to the Martinelli tract without having to walk along Highway One. Per our 2/23/04 scoping letter, we request the PRNS send a letter to property owners along the south boundary of the NPS tract and ask if there might be any willing to sell an access easement. We also ask PRNS to construct a gate at the SE corner of the NPs tract that would halve the distance now required to walk next to Highway One.

## Hunting

While we support the public's opportunities to hunt, we are concerned about the hunting currently allowed on State Lands Commission property immediately to the north of the Project Boundary. Once the north levee is removed, there will be no easy way for hunters to determine the boundary between State Lands (where hunting is allowed) and NPS lands (where hunting on or firing into is prohibited). Furthermore, we suggest that allowing hunting adjacent to the residences of Inverness is increasingly inappropriate. We would suggest instead that the hunting area be moved north of the town of Inverness, perhaps as far as Walker Creek, to provide a reasonable buffer.

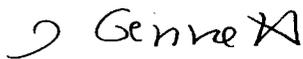
## Small Tributaries

The Restoration emphasizes enhancing the connectivity of the major tributaries (Tomasini, Olema, Bear Valley) but numerous smaller creeks also flow into the restoration area. Many of these creeks, particularly those on the west side of the Restoration that pass under Sir Francis Drake, are culverted. The Sierra Club urges that the scope of the Project be expanded and funds set aside for opportunistic replacement of these culverts to enhance biological and hydrological connectivity.

## Summary

The Sierra Club congratulates PRNS on an overall well designed Project. With few exceptions, as noted in our four comment letters, we concur regarding the importance of the Restoration and look forward to its completion.

Thank you for the opportunity to comment on the Giacomini Marsh Project and please also see our three associated Project letters.

 Gordon Bennett

Gordon Bennett, Sierra Club Marin Group Conservation Chair



# SIERRA CLUB MARIN GROUP

COASTAL SECTION C/O GORDON BENNETT

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

February 12, 2007

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

**Marin County Parks and Open Space District (MCP&OSD)**

Attn: Sharon McNamee  
3501 Civic Center Drive, San Rafael, CA 94903

Wildlife Conservation Board,  
Attn: John P. Donnelly  
1807 13<sup>th</sup> St Suite 103  
Sacramento, CA 95814

Re: Point Reyes National Seashore (PRNS)  
Giacomini Wetland Restoration Project (Project)  
Environmental Impact Statement / Report (EIS/R)

**The Sierra Club, on behalf of its 7,000 Marin County members urges PRNS, MCP&OSD and the California Wildlife Conservation Board to establish a more cooperative plan to benefit the public, the wildlife and the Project.**

Olema Marsh

The DEIR/S page 86 notes that the construction of a causeway across the mouth of Olema Marsh to increase hydrological connectivity with the Giacomini Marsh was considered infeasible because the MCP&OSD *"had concerns about losing some of the values of the existing park."* However, there is no indication that the Wildlife Conservation Board, the owner of this property, was involved in the planning. We would assume that if the causeway would contribute to wildlife conservation, as the Sierra Club believes, then the Wildlife Conservation Board should be willing to allow its land, currently a filled wetland, to be restored. We believe that restoration could be accomplished without losing any value or use of the existing park. PRNS has indicated that the causeway would not impact the parking area, so it would seem that the primary park element that would change if

a causeway were constructed would be a new pathway over a restored wetland replacing the existing pathway over the filled wetland. Furthermore, this decision by the MCOSD appears to have had a material impact on the design of the Project yet, to our knowledge, was never discussed in any public venue. The public should have an opportunity to weigh in on this important matter. In summary, we urge that the causeway and the Wildlife Conservation Board land remain in play as viable options if the adaptively managed restoration of Olema Marsh determines that they would increase or facilitate the Project's restoration goals.

### Viewing Areas

The Sierra Club also desires to keep cumulative impacts from existing and proposed County and NPS viewing sites to no more than exist now along the southern edge of the Project. We have no problem with the two viewing areas proposed by PRNS at the east and west corners of the north end of the Restoration (Drakes View Drive and Railroad Grade). However, the existing MCP&OSD parks on the south side of the Restoration already contain approximately eight viewing areas. In addition along this southern edge, PRNS proposes and we support the viewing area at C Street in Point Reyes Station.

The Sierra Club urges that the southern perimeter trail be routed across the Green Bridge instead of across a new bridge at the site of the former dam, but regardless of which route is ultimately chosen, this trail will result in increased impacts from existing viewing sites. If the new bridge is installed (which we urge it not be), then the bridge itself will become a de-facto new viewing area with significant adverse impacts on wildlife. We also believe that new nationally advertised NPS viewing sites/trail will get significantly more use than the existing county sites. Thus even if PRNS does not add any new "viewing sites", we believe the increased impact of the existing County Park sites will be an unacceptable impact on wildlife. These potentially adverse cumulative impacts were inadequately studied by the DEIS/R.

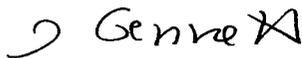
Thus we call on MCP&OSD to recognize the increased impacts from their viewing areas as a result of the PRNS Project and to work with PRNS to establish a coherent set of viewing areas along the southern edge of the Project. We further suggest that a reasonable outcome may be that the number of County viewing areas should be halved. The four County sites to be removed would be restored and the four County sites remaining would be improved so that viewing areas' signage and amenities would be generally consistent along this southern perimeter path regardless of agency jurisdiction and regardless of the ultimate routing of the perimeter trail

## Trails

Regardless of where the perimeter trail is ultimately routed, existing trail segments in the County Parks are roughly 4 feet wide and unimproved. We would urge that this width not be increased in this sensitive area, but we do request that the County consider adding decomposed granite (with pine resin binder) on its segments so that they are consistent with PRNS trail segments in the same area. Likewise we request that the County and PRNS cooperate to make signage, maintenance and rules (e.g. dogs on leash) along all trail segments generally consistent along this southern edge. We urge that the County designate its official trails either vegetatively or with split-rail type fencing (as PRNS proposes to do on its portions) to encourage users to stay on trails through areas that the PRNS Restoration will make significantly more sensitive. We ask the County to then close off and restore the remaining social trails on Wildlife Board land so that these areas become an integral part of the wildlife restoration by channeling human and dog use onto officially designated trails. Again, we find this DIES/R deficient in assessing the cumulative impacts from the Project on existing County trail segments. Lastly, the Sierra Club supports the PRNS proposal to create improved access to the eastern County trail segment from the Green Bridge rather than from Third Street in Point Reyes Station.

In summary, the Sierra Club believes that the DIES/R does not study nor encourage better coordination between PRNS, MCP&OSD and the California Wildlife Conservation Board and we thus urge that cooperative planning take place as soon as possible.

Thank you for the opportunity to comment on the Giacomini Marsh Project and please also see our three associated Project letters

 Gordon Bennett

Gordon Bennett, Sierra Club Marin Group Conservation Chair



Don Neubacher  
02/14/2007 03:27 PM  
PST

To: Ann Nelson/PORE/NPS@NPS  
CC:  
Subject: Sierra Club Giacomini comments

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

415-464-5101 (office)  
415-233-0303 (cell)  
415-663-8132 (fax)

The National Park Service cares for special places saved by the American people so that all may experience our heritage.

----- Forwarded by Don Neubacher/PORE/NPS on 02/14/2007 03:27 PM -----



gbatmuirb@aol.com  
02/14/2007 05:53 PM  
EST

To: don\_neubacher@nps.gov  
CC:  
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## SIERRA CLUB MARIN GROUP

COASTAL SECTION C/O GORDON BENNETT

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February 12, 2007

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

**Marin County Department of Public Works Attn: Farhad Mansourian**  
3501 Civic Center Drive, San Rafael, CA 94903

Re: Point Reyes National Seashore (PRNS)  
Giacomini Wetland Restoration Project (Project)  
Environmental Impact Statement / Report (EIS/R)

**The Sierra Club, on behalf of its 7,000 Marin County members, opposes locating the Project's perimeter path through the SE corner of the Project.**

We do however continue to support the concept of a proposed perimeter pathway as described by the Dona Larkin of Community Pathways Committee: *"a non-motorized off-street path running parallel to Sir Francis Drake Blvd. along the perimeter of the Giacomini Wetland Restoration Project to its northern border near Drakes View Drive. We also believe that the County of Marin can assist in providing the roadside portions of the path for public safety and safe routes to school. We envision a perimeter path, six feet wide where possible, constructed of a durable erosion-resistant, permeable surface such as decomposed granite with pine resin binder. We understand that there are significant challenges to constructing such a path. It would at times have to run on the Giacomini property, and at times along the roadway which would then of course require a safe yet aesthetically pleasing barrier between users and passing cars."*

We also have co-signed a letter with the Marin County Bicycle Coalition, the Community Pathways Committee, Access4Bikes, and Transportation Alternative for Marin that calls for prioritization of funding for this pathway and a memorandum of understanding between PRNS and the County of Marin for its design, construction and maintenance. However, we believe the proposed location at the site of the former dam resulted from a lack of coordination between PRNS and the County, rather than being the best transportation / restoration solution. We continue to urge, per our prior scoping letter, that the perimeter path be routed across the Green Bridge and then along Levee Road. However, the DEIR/S (pg 88) notes *"this alignment raised substantial concerns from local residents regarding public safety along Levee Road, which is one of the main County*

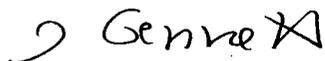
*thoroughfares in this area, and impacts from noise and traffic to landowners on Levee Road and in the town of Point Reyes Station.”* Contradicting these concerns, however, is the certainty that Levee Road (and Sir Francis Drake through to Drakes View Drive) will be redesigned to include bike paths and safely improvements on both sides as are currently proposed for Sir Francis Drake through SP Taylor Park. While these improvements to the Levee Road/ Drakes View Drive section will not be easy, they will be significantly more so than those planned through SP Taylor Park. Thus the issues of public safety, noise and traffic along Levee Road must and will be successfully addressed regardless of whether or not the perimeter path proposed is routed across the former dam site.

In fact, the Alternative C proposal will ultimately result in noise and traffic on both sides of the landowners on Levee Road, as local pedestrians will use the Alternative C path and road bikers will use bike lanes on Levee Road. Also, people leaving or visiting these properties will still have to travel along Levee Road. Users of the proposed perimeter path will also have to use Levee Road when the path through the Restoration is flooded, as the DEIS/R notes will regularly occur.

The cost to the taxpayer of the proposed bridge at the dam site through the corner of the Project is significant. Yet, as noted above, this proposed location would become duplicative when the Levee Road bicycle improvements occur. As noted in our concurrent comment letter to Marin County Open Space District, the Sierra Club would not support widening the path through the MCP&OSD Park beyond the roughly 4 feet that exist now due to impacts to the sensitive adjacent habitat. Thus the Alternative C path constructed with the bridge across the former dam site will be suitable as a “community path” but cannot (and should not) be part of the non-motorized transportation network, as would paved bike paths along Levee Road.

We believe these two projects (the PRNS perimeter path and Levee Road bike paths) should be planned together and sited together rather than separately. The bridge proposed at the former dam site seems like a costly substitute for cooperative planning between PRNS and DPW. The public should not bear the burden of additionally paying for (nor should the marsh bear the burden of being additionally impacted by) this bridge simply because two responsible agencies (PRNS and DPW) have not been able to coordinate their project and funding schedules. In summary, PRNS should move its proposed bridge funding to improve the Green Bridge bike and pedestrian access as part of a cooperative planning with DPW. Both agencies should work to create a multi-use pathway that connects Point Reyes with Inverness Park largely along the existing road right-of-way as proposed in the West Marin Pathways plan.

Thank you for the opportunity to comment on the Giacomini Marsh Project and please also see our three associated Project letters.



Gordon Bennett, Sierra Club Marin Group Conservation Chair



## SIERRA CLUB MARIN GROUP

COASTAL SECTION C/O GORDON BENNETT

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February 12, 2007

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

**North Marin Water District (NMWD)**

Attn: Chris DeGabriele, NMWD Board  
PO Box 146 Novato, CA 94948-0146

Re: Point Reyes National Seashore (PRNS)  
Giacomini Wetland Restoration Project (Project)  
Environmental Impact Statement / Report (EIS/R)

**The Sierra Club, on behalf of its 7,000 Marin County members, urges NMWD to adopt the Department of Health Services (DHS) recommended "maximum contaminant level"(MCL) for chlorine as 250 mg/L as the constraint for the PRNS proposed adaptive management of the Olema Marsh Restoration.**

The DEIS/R notes that a key constraint for restoration of Olema Marsh is the potential that it may result in increased chlorine in the NMWD water that supplies PRNS as well as the communities of Point Reyes Station, Olema, and Inverness Park. This chlorine comes from high tides whose access to the well site may be facilitated by the Olema Marsh Restoration. The Sierra Club certainly does not want to trade off the health of these human communities for the health of the Restoration. However, the DEIS/R (pg 304) notes that DHS has set the recommended MCL of 250mg/L "*primarily for aesthetic reasons*"; the upper MCL is 500 mg/L. Regardless, NMWD has established a limit of only 100 mg/L of chlorine as its taste and odor threshold.

We have no problem with NMWD establishing whatsoever limit it cares to for chlorine. If NMWD chooses a lower chlorine limit in excess of caution and as a result incurs additional operational costs to maintain that lower limit, then that is an issue for its ratepayers. However, when that lower limit triggers adverse environmental impacts, then it does become the concern of the Sierra Club.

The Sierra Club and NMWD had had this same discussion once before in negotiations regarding the transfer of location and use of the Giacomini water

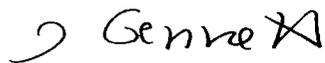
rights. In that discussion, we expressed concern that MMWD's 100 mg/L limit might trigger the apparent need for NMWD to protect its water supply from saline intrusion by erecting a dam across Lagunitas Creek. The State Water Board's WR-95-17 ruling specified the adverse impacts on endangered species (shrimp, salmon) of such a dam. Nevertheless, NMWD insisted during those negotiations of its right to protect its water supplies by installing a dam based on its 100mg/L chlorine threshold.

It was, and remains, the Sierra Club's position that a "need" with such negative environmental consequences must be based on a commensurate and scientifically demonstrated human "need." In the opinion of the Sierra Club, such a low 100 mg/L chlorine threshold does not threaten human health. NMWD's 100 mg/L is an extreme aesthetic taste and odor threshold that only some individuals can perceive. Thus NMWD's 100 mg/L chlorine threshold should not mandate actions that have an asymmetric impact on ecosystem health, including both the possible dam across Lagunitas or as a possible constraint on the Olema Marsh Restoration.

If the salt concern at any threshold level becomes an issue in the Olema Marsh Restoration, then PRNS should weigh the value of contributing funds to NMWD's Gallagher well project which would substantially reduce the tidal threat to the water supply and thus mitigate for the adverse impacts of the Restoration.

In summary, the Sierra Club urges that NMWD agree that the appropriate threshold constraint for the Olema Marsh Restoration should be the DHS recommended 250 mg/L for chlorine, not NMWD's current 100 mg/L threshold. To hold back further restoration of Olema Marsh for any lower threshold would be, in our opinion, an asymmetrical and scientifically unjustified constraint.

Thank you for the opportunity to comment on the Giacomini Marsh Project and please also see our three associated Project letters.



Gordon Bennett, Sierra Club Marin Group Conservation Chair

# Tomales Bay Association

P.O. Box 369



Pt. Reyes Station, California 94956

14 February 2007

Don Neubacher, Superintendent  
Point Reyes National Seashore  
Point Reyes Station, CA 94956  
Park\_Planning@nps.gov

## Comments on the Giacomini Wetlands Restoration.

Dear Don:

You and your staff have done an excellent overview of options on the proposed wetland restoration plan. As TBA was perhaps the first group out here to strongly encourage the buying and restoration of the former Giacomini Ranch, dedicating an entire issue of our *Tomales Bay Watershed* as a digest of the initial review by Phil Williams and Associates in order to help inform the public, we look forward to the restoration both as it's benefit to species habitat and for educational value for the public.

We strongly urge the Park to implement Alternative C, which we believe is actually the better "preferred environmental alternative" than the stated "environmental alternative" as it calls for somewhat less extensive manipulation of natural processes while giving natural hydrology the opportunity to self-restore, and it also includes the potential for educational viewing areas and allows basic low impact transportation opportunities for non-motorized transportation.

With or without public access, there will clearly be a major increase in habitat for many special status species in the restoration area. Including a fair-weather off road path along the western perimeter of the western pasture will offer the best of all possible worlds, allowing people to view the area in a more controlled way than without a designated path, and make a real alternative to the automobile-dependent Sir Francis Drake Boulevard. The health of the bay and our ecosystem will benefit by decreasing local car trips and increasing the public appreciation of the restoration project.

Considering that the Giacomini's will retain the old duck clubhouse and road to it for at least another 25 year, it makes good sense to have that be an area that the public can feel free to use and monitor activities around the old clubhouse.

We urge implementing Alternative C, with the following emphasis:

1. Make elimination of the northern transecting dike of the western pasture the greatest importance and first activity. (We recognize that lowering the levee near the mouth of Lagunitas Creek at the same may be efficacious, but the transecting dike and destination-flocking by humans is most disruptive for wildlife and we wish to emphasize the importance for its complete removal as a top priority)
2. Build the channel-spanning bridge over Lagunitas Creek as soon as monies become available. We note that those monies will come from a different source than the restoration monies, and encourage you to seek such funding so as to undertake the restoration and development of the trail concomitantly.

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3. Emphasize for educational purposes the five major feeder streams into the marsh: Lagunitas, Bear Valley, Olema, Tomasini, and Fish Hatchery Creeks. Encourage limited public access, allowing for the greatest possible vegetation and associated habitat improvement and minimize informal tramping. Extend western perimeter trail to northern end of property, in conjunction with the County of Marin, to allow basic transportation and promote education regarding the importance of transitional wetlands. (We note that a great number of exiting trails in the park pass over or are within wetland areas. E.g. Muddy Hollow trail, Bear Valley trail, the Estero trails.)
4. Maximize opportunities for having an off-road separation of the trail along Sir Francis Drake Boulevard where feasible, include sections with boardwalks such as found in the Everglades to allow drainage, and continue trail toward Inverness along edge of property, where necessary in cooperation with the County of Marin along the SFD easement, per the recommendations of the 1988 West Marin Pathway Feasibility Study.
5. Consider in the future raising Mesa Road on a causeway rather than digging new alignment for Tomasini Creek. In other words, allow nature to restore itself by removing the obstructions that are currently preventing it, as a modification of option in Alternative D. We have no objections to maintaining the spur trail in that area, as there is an existing road anyway. The spur from Mesa Road will probably be visited most by local residents, although there is no need to advertise it. (We note there have been very few nuisance problems with the remote parking at former Bear Valley Stables site, which allows viewing of the Bear Valley Marsh, AKA Olema Marsh and has a connecting trail to the levee road),
6. Utilize the filled land at corner of B-Street and Hiway One as a parking lot if it becomes available and route the trail to avoid 3<sup>rd</sup> Street as a main destination. This will help relieve traffic and parking congestion in Point Reyes Station that will get worse regardless of the restoration or trails.
- 7 We encourage acquiring also the lands on the western pasture that ought to have been included in the original purchase.

The Preferred Alternative has many of the aspects of Alternative D, but in a stronger public educational and pedestrian-friendly form. This alternative meets all the goals of the park service's mission.

We appreciate your diligent work to procure funding to bring this important project to fruition, and your commitment to working with the local population in order to bring about a more healthy, integrated community and ecosystem.

Sincerely,



Kenneth J. Fox, President