

June 22, 2008 Revised

Sage Tezak  
Bollinas Lagoon Restoration Coordinator  
Gulf of the Farallones National Marine Sanctuary  
991 Marine Drive  
The Presidio  
San Francisco, CA 94129

**Re: May 2008 Draft of Recommendations for Restoration and Management/ Bollinas Lagoon Ecosystem Restoration Project**

Dear Ms. Tezak:

This letter expresses the comments of the Seadrift Association on the GFNMS document referenced above ("the GFNMS Draft"). The Seadrift Association represents the general interests of homeowners in the Seadrift subdivision and, in addition, is the owner, subject to an open space easement, of undeveloped property along Dipsea road adjacent to Bollinas lagoon. Our comments are:

1. Table 1, in "Lagoon-wide" section, add to "9-LPP" a new 9b-LPP that reads: "Restore and maintain subtidal shallow areas to natural scope established by 1854 T-Sheets."

The purpose of the LPP is to identify solutions -- actions -- having local support that address problems identified in the earlier COE and Williams lagoon studies. The "Project Goal" is to "Ameliorate the adverse human impacts to Bollinas Lagoon, thereby promoting the natural, dynamic processes of this internationally recognized estuarine environment."

The "adverse human impacts" mentioned in this Goal are identified in the studies. Thus, the July 2006 Williams Report at 94-96 summarizes its calculation of "Human-Induced Changes to Lagoon Conditions." The number Williams presents for tidal prism loss attributable to man is 1.2 million cubic yards. The May 23, 2006 PRAG summary of the Williams analysis describes the impact of this 1.2 million cubic yards of tidal prism loss on the "natural" habitat based on the 1854 T-Sheets this way (at page 7): "The largest habitat changes between 1854 and the 2050 projection shows 1) more tidal marsh and frequently exposed mudflat, 2) loss of subtidal shallow and less frequently submerged mudflat habitat, and 3) more fluvial delta and transitional habitat (due to expansion of Pine Gulch Creek delta)."

Of the three major habitat changes attributable to man recognized by the PRAG as established in prior studies, the present draft LPP addresses only the third, the expansion of the Pine Gulch Creek delta. At a minimum, the Locally Preferred Plan should include an action item to restore and preserve subtidal

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shallows which the 1854 T-Sheets show exist in the lagoon's natural "equilibrium" condition.

The GFNMS Draft itself acknowledges some of the serious impacts associated with loss of the subtidal shallow environment at page 16: substantial if not complete loss of 33 invertebrate species, elimination of "most of the 38 species of fish known to occur in the Lagoon," and reduced foraging habitat for two feeding guilds of diving birds. From our observation, heavy feeding use of these subtidal shallow areas by the egret and heron populations suggests that their loss would put added pressure on these birds when they use the Audubon Canyon ranch breeding site.

Loss of the subtidal shallow habitat is a serious issue that needs to be addressed directly. Since the GFNMS Draft does not do so, we cannot be certain why. One issue of which we are aware is a concern that any sediment removal in these areas might quickly be replaced by new sediment. That concern is unfounded. As the Williams report explains, the sediment from the ocean diminishes with the reduction in the tidal prism and an "equilibrium" reached. In addition, physical evidence proves that sediment removed in the southeast arm of the lagoon is not rapidly replaced. The channel running alongside Dipsea road, constructed decades ago, remains today.

Another objection we have heard is that the lagoon should not be managed to achieve a particular configuration but rather allowed to evolve naturally. Here, however, the studies establish the "pristine" lagoon condition and show that man's intervention will prevent the "natural" configuration from developing. The GFNMS and COE should act to restore the lagoon to its natural condition. MCOSD has a statutory obligation to do so.

2. In Table 1, "Easkoot Creek section, add a new 3b-LPP that reads "Remove excess sediment in and downstream of Easkoot Creek, regardless of results of 3a-LPP."

The GFNMS Draft acknowledges in 3a-LPP that Easkoot creek has been channelized. That the natural flood course of the creek included places other than the lagoon was established by the breakout this winter through the Stinson Beach parking lot. The fact that GFNMS has not identified a "delta" at the mouth of this creek does not mean that excess sediment has not been deposited in the southeast arm of the lagoon, only that the sediment is distributed more broadly by tidal or flood flows. Excess Easkoot sedimentation should be addressed in the same way as every other fluvial water source.

There is no legitimate scientific, environmental or management basis for conditioning sediment removal on successful "floodplain restoration activities" or to require that it be "sustainable" (if that means that sediment removal is never to be repeated). Floodplain restoration is of course desirable, as is "sustainable"

sediment removal. Floodplain restoration, however, is not a prerequisite to sediment removal. It may be that as to both Pine Gulch Creek and Easkoot creek, floodplain restoration is impossible or more expensive than repeated sediment removal. The GFNMS and COE should nonetheless proceed with feasible, environmentally sound restoration in the lagoon. Even a limited mitigation of human impacts on the lagoon would be better than no mitigation at all. Moreover, whether a particular remediation is environmentally and economically sound is an issue to be determined in the EIS process, not predetermined by the working group in developing the Locally Preferred Plan.

3. Delete 8-LPP.

Based on our experience with Seadrift lagoon, "managing tidal exchange" would not improve the condition of Bolinas lagoon. In addition, we caution that the European green crab, about which the GFNMS draft expresses concern at 19, is extant in Seadrift lagoon.

4. 5-LPP should be revised to include:

Create sedimentation traps on the East side of Highway 1, thus eliminating further deposits from the various creeks that drain into the Lagoon. Any wording associated with the construction of a causeway should be eliminated from the draft as constructing one would only promote an acceleration of the filling of the lagoon.

5. The document should be limited to a discussion of the Draft Recommendations for Restoration set forth in Table 1 or divided into two distinct sections, one of which is so limited.

Table 1 sets forth the "Locally Preferred Plan" whose development is the primary task of the working group. The balance of the document, while of interest, diverts attention from the plan itself. The Locally Preferred Plan is the only item for further joint action by the Corps of Engineers (COE) and the Marin County Open Space District (MCOSD).

Sincerely yours,

Terry J. Houlihan, President