



The Environmental Action Committee *of* West Marin

October 10, 2006

William Carmen
Bolinas Lagoon Ecosystem Restoration Feasibility Project
Marin County Open Space District
3501 Civic Center Drive, Suite 415
San Rafael, CA 94903

Dear Mr. Carmen,

The Environmental Action Committee of West Marin submits the following comments on the Preliminary Bolinas Lagoon Intervention Alternatives.

1. Scientific reviews of Bolinas Lagoon have shown that aggressive or engineered interventions are not needed.

An ecosystem restoration project should be considered for Bolinas Lagoon only if the Lagoon's dynamic processes, structure, and ecological functions are demonstrated to have become so degraded that the Lagoon can no longer function as a natural, self-sustaining system that can recover from external disturbances. There is no evidence at all that Bolinas Lagoon is in this situation. To the contrary, the evidence suggests that Bolinas Lagoon is healthy, and that dredging could cause more harm than good.

2. "Passive" restoration of Bolinas Lagoon should be considered before more dramatic interventions.

If a restoration need is scientifically demonstrated, removing existing non-natural structures, such as dikes, is less likely to have unanticipated negative impacts on the Lagoon's complex ecological processes than highly engineered structural interventions.

3. Dredging has been demonstrated to be unnecessary and would have negative impacts on Bolinas Lagoon.

Regarding the 2006 Bolinas Lagoon Ecosystem Restoration Feasibility Project Draft Reports, the Technical Review Group found that "The greatest strength of the study is that all of its reports support the conclusion, to a greater or lesser degree, that the lagoon is unlikely to close and that dredging or any other action to prevent closure is not justified at this time. There is an absence of ecological problems that would be mitigated by such apparently unnecessary preventive actions."

The Technical Review Group also stated that the impact of dredging would result in "manifold short-term negative impacts, such as the likely reduction in shore bird populations and disruption of the recently renewed Coho run in Pine Gulch Creek, and the disruption of current creek flows with their impacts on sediment deposition and removal" and that these impacts "would seem to strengthen the case against large-scale dredging."

4. All Alternatives that include dredging should be abandoned entirely.

There is no justification for dredging the Lagoon. Dredging would damage, not restore, the Lagoon. We urge that the following alternatives be abandoned:

All Dredging Alternatives: D-1, D-2, D-3, D-4, D-5, D-6, DC-1

All Dredging and Non-Dredging Combinative Alternatives: DN-1, DN-2, and DN-3

5. Certain Non-Dredging Alternatives should be abandoned entirely.

Non-Dredging Alternative ND-3: The proposed groins would have significant negative impacts and would not, as claimed, reduce erosion of the bluff. They will instead cause erosion downdrift and starve other locations of sand and sediment. They will alter the width and structure of the beaches below the bluffs. Moreover, their impact on sediment transport will be only temporary, until the groins fill in.

Non-Dredging Alternative ND-4: There is no reason to proceed with this Alternative, the effectiveness of which "is not currently known" and which would require substantial structural intervention.

6. The Goals and Objectives for Bolinas Lagoon must recognize that lagoons undergo a natural evolution and no effort should be made to "freeze" a lagoon at one point in its evolution.

Draft Lagoon Goal: The use of the word "maintain" in the Draft Lagoon Goal implies an intention to artificially keep the lagoon at a particular evolutionary stage. The emphasis should be shifted away from "maintaining the lagoon" and towards ensuring the Lagoon's ecological viability.

Draft Project Goal: There is currently no scientific justification for a project, and any project goal should follow upon, not precede, a scientific review that calls for a restoration project.

Draft Objectives: Apart from monitoring, these objectives are premature. There is no scientifically demonstrated need for intervening in the tidal and subtidal habitats.

Thank you for this opportunity to comment,

Sincerely,



Catherine Caufield
Executive Director