



AUDUBON CANYON RANCH

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14 June, 2010

Ruby Pap
California Coastal Commission
45 Fremont Street, #2000
San Francisco, CA 94105-2219

RE: HABITAT PROTECTION AND RESTORATION AT LAWSON'S LANDING

Dear Ms. Pap,

Audubon Canyon Ranch (ACR) owns and manages a system of wildlife sanctuaries in Sonoma and Marin counties, which includes approximately 450 acres of shoreline properties on Tomales Bay. Since the early 1970s, ACR has conducted research, education, and conservation activities to help ensure the long-term protection of the natural resources of Tomales Bay. ACR's Toms Point sanctuary borders the sensitive dunes ecosystem where unpermitted recreational uses are conducted by Lawson's Landing. Our interest in the ecological health of Tomales Bay includes this valuable dune-wetlands complex at the north end of the bay.

We urge you to require a Coastal Development Permit for Lawson's Landing that provides for the enhancement of both the environmental and recreational values of this beautiful and unique natural area. The most effective way to achieve this twofold goal is to relocate intensive camping and associated structures outside of sensitive wetland areas, to less-sensitive areas adjacent to the dune-wetland landscape.

Specifically, nearby upland areas along the Sand Haul Road may be suitable for the development of upland camping areas. Use of these areas would include road and trail access to the beach, dunes, and wetlands, and promote an environmentally appropriate recreational experience. In addition, relocating intensive uses to upland areas would allow for the establishment of a managed corridor for natural sand replenishment, which is needed to restore and sustain the character and health of the mobile dunes system. Upland camping would further allow for designated, individual camp sites and parking with inherent limits on the number of visitors and vehicles. Such environmentally appropriate land use would minimize adverse effects on sensitive habitats in the area.

We have the following key concerns:

Camping should be prohibited within 100-foot wetland buffer areas. Such transition zones are important ecological features of healthy wetlands, and they should be protected to comply with requirements in the Local Coastal Program.

Wetland delineation should allow for normal annual and seasonal fluctuations in the extent of wetland conditions. Effective protection should allow for the dynamic character of natural dune-wetland systems.

Artificial ditches that drain the wetlands should be eliminated. The protection of natural ground and surface water systems is crucial in the protection and restoration of healthy wetlands.

A detailed natural resources management plan should be developed. Details should specify critical conservation objectives and provide for oversight suitable for the long-term protection of sensitive natural resources.

A Coastal Development Permit should be conditioned on establishing conservation easements to protect sensitive habitats in the area. Such easements should include guarantees for responsible oversight and management of natural resources by a qualified organization or agency.

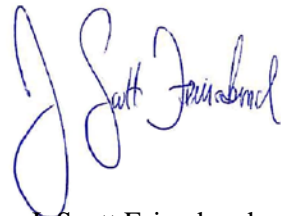
We are hopeful that the Coastal Commission will ensure the protection of this unique natural area.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "John P. Kelly". The signature is fluid and cursive, with a long horizontal stroke at the end.

John P. Kelly, PhD
Director, Conservation Science and Habitat Protection

A handwritten signature in blue ink that reads "J. Scott Feierabend". The signature is cursive and somewhat stylized, with a large initial "J".

J. Scott Feierabend
Executive Director