MARIN CONSERVATION LEAGUE

Celebrating 75 Years

June 9, 2010

Valary Bloom and Josh Hull
U.S. Fish and Wildlife Service
2800 Cottage Way, W-2605
Sacramento, CA 95825

Re: Draft Recovery Plan for Tidal Marsh Ecosystems of Central and Northern California

Dear Valary Bloom and Josh Hull:

Marin Conservation League (MCL) appreciates the opportunity to comment on the Draft Recovery Plan for Tidal Marsh Ecosystems ("Recovery Plan") of Northern and Central California. The Draft Plan represents a significant and valuable update in information resources on the listed endangered and threatened species and species of concern, and provides definitive strategies and priorities for protecting and restoring the tidal marsh and associated ecosystems on which they depend.

MCL has been engaged for many years in the funding, acquisition, protection, and restoration of Marin County's tidal and diked historic baylands. We recognize that Marin baylands are part of the regional San Pablo/San Francisco Bay ecosystem. Preserving and, where possible, restoring linkages between Marin's tidal marshes and other marshes in the bay region are essential to support viable populations of the six target species and the other listed and non-listed species of concern addressed in the Recovery Plan. We are also aware that the new threat of sea level rise due to climate change will require new approaches to preserving the ecological functions of these tidal habitats.

Recommended Recovery Plan Modifications

We have reviewed the text and maps in the Draft Recovery Plan and request that you consider the following comments and modify the final Plan accordingly. Our focus is on the San Pablo Bay and Central/South San Francisco Bay Recovery Units.

1. The Recovery Plan establishes that California clapper rail (CCR) habitat for each San Pablo Bay core population must have a minimum of 2,500 acres (1,012 ha) of contiguous high-quality tidal marsh habitat with well-developed channel systems and high-tide refugia/escape cover, at the high marsh/upland transition zone and/or inner-marsh. Between the extensive tidal marshes of China Camp and the Petaluma River, existing tidal marsh is limited to a fairly narrow fringe along San Pablo Bay shoreline. Hundreds of acres of historic tidelands lie behind levees, however – either currently undergoing restoration (Hamilton), publicly owned and planned for restoration (Bel Marin Keys), or in private ownership and potentially restorable (St. Vincent's/Silveira Ranch). Altogether, these diked historic tidelands can more than meet this minimum habitat area requirement. The mapped Segment G, Figure 111-13, page 257, in the San Pablo Bay Recovery Unit indicates potential restoration for two areas on the lands of St. Vincent's/Silveira Ranch. A large triangle of land, its tip extending from the tidal marsh on San Pablo Bay to its "base" just east of the RR track, is omitted – that is, it is not indicated for potential restoration, although it is physically contiguous with potential restoration areas on either side. *This is a mysterious omission.* Further, the two areas that *are* shown for potential restoration should be of equal Z1 priority (the area to the north is shown as Z2). This large block of historic tide land is a key part of the China Camp-to-Petaluma River linkage and should be designated for potential restoration.

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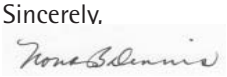
2. The focus of the Recovery Plan is on large blocks of existing and potential future tidal marsh habitat. An exception is made for Corte Madera Marsh, where existing development limits the available habitat area for both CCR and salt marsh harvest mouse (SMHM) to 400 acres at most. Other exceptions should be made in the bay lands of Marin County, in both San Pablo Bay and Central/South Bay Recovery Units. The scale of maps in the Recovery Plan does not allow "fine tuning" to show important small areas in detail, and yet in Marin County such areas constitute marsh habitat and refuge for both CCR and SMHM as well as linkages between larger blocks of tidal habitat. For example, CCR habitat exists in both the North and South Forks of Gallinas Creek west of the China Camp mouth of Gallinas Creek (Map Segment G, Figure 111-13, page 257). In particular, the Recovery Plan should note the need to conserve the fringes of tidal marsh along the North Fork that borders the San Rafael Airport to the south, and McInnes County Park to the north. These are vital, if narrow, areas contiguous with China Camp marshes and offer CCR important refuge. Further, along the shore of East San Rafael (San Pablo Bay Recovery Unit), small pockets of diked historic tidelands should be considered for potential restoration, such as "Canalways." In Richardson Bay (Central/South Bay Recovery Unit), the Bothin Marsh Preserve includes less than 200 acres of restored historic tidal marsh, but both CCR and SMHM (likely) have returned. Wherever small discontinuous pockets of tidal marsh exist along the Marin bay shoreline, they should receive attention so that linkages can be identified and conserved. It will take larger scale maps to accomplish this.

3. We agree with the designations on Map Figure III.15, Segment I (page 259) that call for ecotone restoration of two areas within the Corte Madera shoreline ("Green" property, and Golden Gate Bridge District dredge disposal site). The report is correct in noting that the area extent of tidal marshes in Corte Madera Ecological Reserve is limited by adjacent development. Nevertheless, the restoration of former diked historic tidal marsh in the mid 1970s has been successful, and a healthy population of CCR now inhabits the area. With no room for the tidal marsh to "move up" as sea level rises, the indicated areas for ecotone restoration offer both refuge and buffer.

4. In the Greco Island/Bair Island area of the Central/South Bay Recovery Unit, we are concerned that Map Figure III.2- Segment N does not indicate the Cargill salt pond site ("salt works") in Redwood City for potential restoration, in spite of the obvious capability for these salt ponds to be restored to tidal marsh and to contribute to the recovery of key species of concern, including western snowy plover and California least tern. This is supported by the Draft Recovery Plan itself. The Recovery Plan states: "Some of the greatest gains in tidal marsh recovery will be made from restoring historic former tidal marsh or other restorable area to functioning tidal marsh habitat. . . . habitat restoration will allow and speed the recovery and conservation of tidal marsh species." No explanation for the omission of this substantial acreage of remaining salt ponds is offered, and no argument is presented for their exclusion from being classified as Z1 for restoration. We urge you to reconsider this area carefully.

Thank you for the opportunity to comment on the Draft Recovery Plan.

Sincerely,



Nona Dennis, President

Cc: Save the Bay
Marin Audubon Society