



United States Department of the Interior

NATIONAL PARK SERVICE
Point Reyes National Seashore
Point Reyes, California 94956

IN REPLY REFER TO:

L7617

JAN 09 2015

Dear Interested Party:

Point Reyes National Seashore (Seashore) has released for public review the Coastal Dune Restoration Environmental Assessment (EA) to improve and restore coastal dune habitat of critical ecological importance in the park. Under this planning process, the Seashore is proposing to restore up to 600 acres of coastal dune habitat primarily to benefit species listed as threatened or endangered under the Endangered Species Act (e.g., federally listed species). Habitat would be restored by removing highly invasive, non-native plant species that have greatly altered sand movement, dune structure, and habitat function for native plants and animals uniquely adapted to this coastal environment. The proposed activities have been adapted to further reduce potential impacts to adjacent ranch operations.

Background

Since 2001, the Seashore has conducted a series of coastal dune restoration projects along the Great Beach to remove non-native, invasive plant species such as European beachgrass and iceplant. Native dune habitat in the Seashore provides critical habitat for four federally listed and several additional rare and unique species of plants and animals and represents some of the largest expanses of rare native dune plant communities remaining in California. More than 60% (1,400 acres) of the park's roughly 2,200 acres of coastal dune, bluff, and scrub habitat has been invaded by European beachgrass and iceplant, which establish vast monocultures that crowd out native plant species. As a result of habitat conversion and other factors, reproductive success of both the federally endangered Tidestrom's lupine and the federally threatened western snowy plover has decreased dramatically in dune areas.

Some of the impacts to listed species can be reduced through habitat restoration efforts. One year after the Abbotts Lagoon Coastal Dune Restoration Project was implemented in 2011, more than 15,000 endangered Tidestrom's lupine plants had established across approximately 16 acres of the Abbott's Lagoon project area, and plovers had moved into the restoration area to nest or raise young.

Project Scoping

Based on the initial success of these restoration efforts, the Seashore initiated a planning process in 2012 to expand its restoration efforts to other park dune systems in future years. A scoping letter was sent to the public on December 6, 2012, to solicit comments on dune restoration within the Seashore. At that time, the park proposed a programmatic approach to dune

restoration in addition to several high priority dune restoration areas including AT&T and B Ranch. Based on concerns raised during that scoping, the park has narrowed the scope of the EA to include the following project sites: AT&T, B Ranch, A Ranch, North Beach, Davis, and Limantour Beach. Park staff have met with each of the ranch operators in this planning area to assure that the proposed activities are compatible with their operations. This EA has been prepared in compliance with the National Environmental Policy Act (NEPA) to assess impacts of alternative means or methods of removing these invasive plant species.

Environmental Assessment

This EA includes three action alternatives that focus on different primary means or methods for invasive plant removal within the project areas (Alternatives B-D), as well as a No Action Alternative (Alternative A), which would involve no near-term restoration efforts within these dune systems except for previously permitted projects. The methodologies evaluated in the EA reflect the latest information on improvements in treatment approach and efficacy from dune restoration efforts in the Seashore and in other West Coast dune systems. The three action alternatives differ in terms of which methods would be used primarily for initial treatment: Alternative B (Manual Removal), Alternative C (Chemical Control), and Alternative D (Mechanical Removal). Alternatives C and D would rely on a combination of techniques, such as manual removal of beachgrass in wetlands and mechanical removal of beachgrass in wetland and organic pasture buffers in Alternative C, or hand removal of iceplant in Alternatives C and D. In addition, re-treatment may not be the same as the initial control methods. For example, hand removal or spot spraying of re-sprouts may take place after mechanical removal (Alternative D), and hand removal may also occur after initial chemical control (Alternatives C and D). Under Alternative C, pre-treatment of European beachgrass herbicide treatment areas would potentially be conducted through use of prescribed burning or mowing.

Restoration efforts are being coordinated closely with adjacent ranchers to ensure that dune restoration efforts have no or minimal impacts on ranch operations. Park staff has consulted with lessees with operations bordering potential dune project areas to discuss impact avoidance and minimization measures. When adjacent ranchlands border proposed dune restoration areas, restoration plans would emphasize minimizing movement of sands following restoration into adjacent pastures. Measures for reducing sand movement include focusing initial restoration efforts on more oceanward portions of the dune system, leaving some of the invaded backdunes as a buffer between dune restoration and adjacent pastures. Restoration of backdune areas would occur in a more phased approach that would allow more time for native vegetation to recruit into restored areas and, thereby, minimize potential for sand movement. In addition, active revegetation of backdune areas may be conducted to assist with soil stabilization.

Alternative C is the preferred alternative. The preferred alternative was identified on the basis being the alternative that offers the greatest benefits with the least impact to park ranches and coastal resources. Alternative C minimizes implementation-related impacts to natural and adjacent land use resources associated with large-scale excavation efforts and maximizes long-term benefits to natural dune processes and native ecosystems and species. Because costs of both mechanical and manual removal of European beachgrass are 10 times higher than chemical control, the total area of coastal dune that could be restored under Alternatives B and D would be much less under these alternatives than under Alternative C. Alternative C is also identified as the environmentally preferable alternative.

Coastal dune restoration typically takes place in areas of high ecological and other resource importance, where the avoidance or minimization of adverse impacts to species of special concern, rare vegetation communities, wetlands, cultural, and adjacent land use resources is very important. In addition to protecting current ranching operations, the EA identifies a wide variety of measures to avoid or minimize impacts to sensitive resources, including minimizing implementation during the breeding season for various threatened and endangered species and establishing buffers between work areas and documented nests and breeding habitat, wetlands, and organic pastures. Chemical control would only occur during appropriate weather conditions (i.e., low winds and fog during non-rainy days) with protective buffers established adjacent to organic pastures, wetlands, rare plants, and nesting areas and would involve only a very controlled application of herbicide to target species using backpack sprayers with calibrated wands.

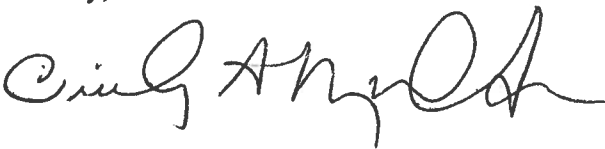
Consultation on potential impacts to listed species would be conducted with the U.S. Fish and Wildlife Service. In addition, because the project area is located within the coastal zone and would potentially result in modification to coastal and wetland resources, the project may also require review by and permits from the California Coastal Commission, the U.S. Army Corps of Engineers, and the San Francisco Bay Regional Water Quality Control Board.

As part of this planning process, we welcome your comments on the EA. The preferred method for submitting comments is via the internet through the NPS Planning, Environment and Public Comment site at <http://parkplanning.nps.gov/pore>. From the main page, click on the Coastal Dune Restoration EA link, and then on the "EA" link to comment. You may also mail or hand-deliver comments to "Coastal Dune Restoration EA" c/o Superintendent, Point Reyes National Seashore, 1 Bear Valley Road, Point Reyes Station, CA 94956." The end of the comment period is Monday, **February 9, 2015**.

Comments will not be accepted by FAX, e-mail, or in any other way than those specified above. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

If you have any questions, please contact Lorraine Parsons, Wetlands Ecologist, at (415) 464-5193, or Lorraine_Parsons@nps.gov. We appreciate your participation in the process.

Sincerely,



Cicely A. Muldoon
Superintendent