

Rachel Reid, Environmental Planning Manager
Marin County Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Ms. Reid:

In my capacity as the San Francisco Bay Program Leader at Point Blue, I am submitting the following comments regarding the San Rafael Rock Quarry (SRRQ) EIR Addendum; in particular, MM C4.3-18 dealing with the restoration of the 50 + acres of what is described in the current restoration plan as “an existing successful and vibrant marsh.”

Point Blue’s 160 scientists work to reduce the impacts of climate change, habitat loss, and other environmental threats while developing nature-based solutions to benefit both wildlife and people. We work from the Sierra to the sea, across the Western Hemisphere and as far away as Antarctica, preparing for the changes and challenges ahead. Relative to the SF Bay Area, we are proud of a variety of successful wetlands restoration projects we have been involved with including the South Bay Salt Pond Restoration Project, Hamilton Wetlands, and Sonoma Baylands.

On a July 28, 2021 tour of the SRRQ wetlands, I saw a lack of bird species that typically inhabit a vibrant marsh likely because the site is completely cut off from the bay’s tides and only allowed to flood via a tide gate during extreme high tides. As was explained by Ross Campbell, the SRRQ engineer who joined our tour, this extreme tide flooding is designed to limit the spread of invasive plant species within the marsh. This sporadic human-controlled flooding is likely limiting food resources, increasing predation pressure, and preventing successful reproduction by marsh dependent wildlife. Furthermore, I witnessed ATVs crossing the marsh to spray for mosquitoes, a practice which likely discourages birds and other wildlife from breeding or foraging in the vicinity. In addition, the transition zone from wetland to upland habitat at the edge of the site was dominated by non-native plant species and would provide very little vegetative cover for animals that might seek refuge there during the monthly human-controlled flooding. In the short-term, this transition zone can be restored with dense native vegetation that will provide cover for wildlife seeking refuge during extreme tides.

This marsh does not represent a healthy wetland and would benefit from natural tidal exchange to become a “successful and vibrant marsh.”

In the State Coastal Conservancy’s report, [The Baylands and Climate Change: What We Can Do](#), one of the top recommendations is to accelerate tidal marsh restoration by 2030. The sooner tidal marshes are restored, the more likely they are to flourish and provide ongoing benefits when sea level rise accelerates in the middle of this century. In addition to creating a functioning tidal marsh, restoring tidal flows to the SRRQ wetland can provide many other important benefits. Not only would the marsh provide habitat for at-risk bird species and other wildlife, but it would reduce the need for spraying for mosquito vectors. Restoring the SRRQ site could increase flooding near the Point San Pedro Rd. Brickyard Rd. intersection which

would need to be investigated. However, with just 1.6 ft of sea level rise, there are flood vulnerabilities to adjacent homes near the site (see [OurCoastOurFuture.org](https://ourcoastourfuture.org)). This flood vulnerability that will increase with time could be addressed in conjunction with tidal restoration. The feasibility of such a multi-benefit approach is increased with the new permitting mechanisms and funding sources that are now available. For example, the [San Francisco Bay Restoration Regulatory Integration Team](#) (BRRIT) can be used to improve the permitting process for multi-benefit restoration projects and the San Francisco Bay Restoration Authority has funds for multi-benefit tidal restoration projects. Waiting to restore the marsh will make achieving successful outcomes increasingly difficult and the opportunities for incorporating the marsh as part of a nature-based solution may become more limited if other traditional gray infrastructure is pursued first.

In conclusion, the SRRQ site has all the potential for an ideal multi-benefit project that can serve as an example of successful nature-based adaptation that provides habitat for at-risk tidal marsh species, flood protection, recreation opportunities, and improved public health safety. All of this points to the need for revisiting the current MRP with the objective of developing an updated approach that will consider the multiple benefits and feasibility of tidal wetland restoration at the SRRQ site.

Sincerely,

Julian Wood, San Francisco Bay Program Leader