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July 18, 2018

SFDB Improvement Project SEA/SIS  
c/o Nathan Allen  
FHWA-CFLHD  
12300 West Dakota Ave., Ste. 380  
Lakewood, CO 80228  
*Via electronic delivery*

Re: Comments on SFDB Improvement Project Draft SEA/SIS

Dear Mr. Allen,

Thank you for the opportunity to comment on the Sir Francis Drake Boulevard Improvements Draft SEA / SIS. Our comments focus on the proposed restoration of the historic wetland at Drakes Beach as mitigation for the destruction of jurisdictional wetlands in other areas of Point Reyes National Seashore (PRNS).

River Otter Ecology Project, based in Marin County, CA, engages the public in supporting conservation and restoration by linking river otter recovery to the health of our watersheds through education, research, and community science. River otters, although not a protected species, are sentinel apex predators that use every part of watersheds, from headwaters to ocean. Their presence and success are important indicators of ecosystem function and environmental health. They provide critical ecosystem services such as transport of marine nutrients to terrestrial habitats and transmission of trophic effects. They also affect the composition and abundance of prey species.

We support the restoration of the historic wetlands at Drakes Beach, but we deeply regret that the project will come about only as a consequence of the destruction of other wetland areas in Point Reyes National Seashore. We also have reason to believe that, if not properly mitigated, the construction activities associated with the restoration may have negative impacts on river otters resident in the Drakes Beach area.

For six years, we have conducted intensive research on recovering river otter populations within Point Reyes National Seashore. Considered extirpated in the SF Bay Area until 1989, river otters have been reintroducing themselves on their own, in a highly-positive and well-publicized recovery. Consistent

with NPS Management Policy 4.2, our “studies support the NPS mission by providing the Service, the scientific community, and the public with an understanding of park resources, processes, values, and uses that will be cumulative and constantly refined.”

River otters depend upon fresh water for drinking and grooming, but fish comfortably in fresh, brackish, and nearshore ocean waters. Natal dens tend to be high above average water levels to avoid spring flood events. The otters’ ability to move with their pups between denning and hunting areas is critical to their ability to thrive. Because of their fast metabolism and high energy needs, river otters hunt often throughout the day and night.

The Drakes Beach area provides rich habitat for river otters, and consequently is of critical importance for the recovery of the species in PRNS. They give birth and den in the upland areas, hunt and feed in the freshwater pond, and transit the culverts under the footpath to the Peter Behr Overlook Trail to access nearshore foraging grounds in Drakes Bay.

We have documented the importance of the area (ROEP unpublished data):

- In 2017, 33% of the known river otter population in PRNS inhabited the area around Drakes Beach.
- From 2014 through 2017, 32% of known PRNS river otter pups were born and reared in that area.
- From June through December 2017, river otters used the culverts at the foot of the Peter Behr Overlook trail on 165 days, 77% of total days.
- From July through September 2017, river otter pups used the culverts on 42 days, 46% of total days.

From September 2016 to June 2018, we performed a monitoring study for Mt View Sanitary District (MVSD) in Martinez, CA. We documented that construction activities associated with restoration of the District’s reclamation ponds changed the foraging behavior of the resident river otters, forcing the otters into an increasingly narrow habitat corridor, and eventually leading them to temporarily abandon the restoration area. We believe a similar dynamic will occur at Drakes Beach with unknown consequences for the larger PRNS river otter population.

In order to minimize the negative effects of construction activities on river otters, we recommend the following:

- The River Otter Ecology Project requests inclusion in the development process for the detailed construction plan.
- Construction activities should be limited to the period outside the post-den rearing season for river otters, typically April through September.
- Funding for continued monitoring of river otter usage of Drake’s Beach, Drake’s Pond and adjacent areas should be included as part of the mitigation and monitoring reporting program.

Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script that reads "Megan Isadore". The signature is written in a dark ink and is positioned above the typed name and contact information.

Megan Isadore,  
Co-Founder and Executive Director  
415.342.7956

Cc: Cicely Muldoon, Ben Becker, Dennis Rodoni