



Monterey District
2211 Garden Road
Monterey, CA 93940

January 19, 2006

Paragon Geotechnical Consulting Engineers
Frederick J. Wentz, Jr., G.E. No. 2581
Donn Ristau, Ph.D., CEG No. 1155
1049 Kimi Way
Placerville, California 95667

Re: Response to Comments
Draft Initial Study/Mitigated Negative Declaration (IS/MND)
Tin House Road Project at Julia Pfeiffer Burns State Park

Dear Mr. Wentz and Dr. Ristau:

Thank you for your comments during the public review period for the Tin House Road Project at Julia Pfeiffer Burns State Park. Your interest in this project and the comments noted in your letter are very much appreciated and it is hoped that the following responses will help to answer your questions and concerns regarding this project.

- P1. The comment questions how “constructing swales and dips in the road to direct runoff” will not concentrate runoff. As the project description in the MND states, the existing road is insloped, concentrating runoff in an inboard ditch. This concentration of water increases the erosive force of water. The project will install frequent swales and dips so the water does not concentrate as it does now. The swales and dips will be placed selectively to direct runoff to existing stable natural drainage areas down slope from the road. Installation of the dips and swales in combination with outsloping the road will dramatically reduce the concentration of runoff.
- P2. The comment states that outsloping the road will introduce drainage onto multiple sliver fills located along the outboard edge of the road and suggests that the sliver fills be entirely removed. Tin House Road is over 50 years old. Many of the sliver fills are stabilized with dense growth of native vegetation. Removal of these stable sliver fills would expose significant areas of bare soil subject to erosion and would be counterproductive to the goal of improving soil stability. In selected areas where sliver fills are now unstable, they will be removed as part of the process of outsloping the road.
- P3. The comment states that removal of fill from the lower switchback will result in over steepened banks on the Schoendorf property and damage to at least one redwood tree and that there are no mitigation measures for disturbance of the Schoendorf property. The proposed removal of fill is designed to restore the topography of the creek drainage to its

natural condition before road construction and maintenance activities placed fill in the creek. The source of all of the artificial fill in the drainage is from the road work on the State Park or south side of the creek. None of it is from the Schoendorf property so its removal will not “over steepen” the slope but simply return it to its natural condition. The bark of the redwood tree will be protected from damage by temporarily covering the lower trunk with snow fence. During the removal of fill adjacent to Schoendorf property an engineer and biological monitor will be on site to direct the equipment operator to minimize disturbance to the Schoendorf property. Where necessary soil will be removed by hand.

- P4. The comment states that the extent and depth of the fill along the outboard edge of the road is unclear and therefore it is unclear whether the proposed mitigation measures are adequate. Appendix A of the MND, sheet six includes ten cross sections that show the extent and depth of the fill in the vicinity of Redwood Creek. It is not proposed to prepare detailed drawings of the remainder of the road since the work will not impact a creek or Schoendorf’s property. The work will be done in conformance with California State Parks Field Techniques for Forest and Range Road Removal Manual.
- P5. The comment states that crib wall details have not been provided and geotechnical investigations have not been prepared. Engineering details of the crib walls are beyond the scope of the environmental analysis. They will be prepared in conjunction with the construction documents and will be available to the public when the project is put out to bid. The Tin House Road is a rural, limited use road, not open to public vehicles; its most common use will be as a hiking trail. It is not the practice of California State Parks or other land management agencies to perform geotechnical analyses related to this type of construction. A licensed Civil Engineer will inspect excavation for crib wall and direct final base placement of crib wall.
- P6. The comment states that Section 2.5 does not mention the presence of silver fills between the first and second switchbacks. Silver fills between the first and second switchbacks will be addressed the same way as with the rest of the road. See response P2.
- P7. The comment refers to a large debris slide located adjacent to the lower switchback and states that potential reactivation of this slide represents a significant risk to Tin House Road, the creek and Schoendorf property. State Parks will take care to avoid any disturbance of this debris slide during construction; nothing done as part of this project will increase the risk of reactivation of this slide.
- P8. The comment discusses the need to carefully locate swales and rolling dips so runoff is directed to natural drainages and not to landslide features. These features will be sited by a civil engineer in the field during construction following California State Parks Field Techniques for Forest and Range Road Removal Manual. See response P1.
- P9. The comment questions the statement in the MND that existing uses of the road will not be affected by the project. Comment noted but since the project is designed to improve the stability of the road using proven techniques there is no reason to believe that the current very limited uses of the road will be affected.
- P10. The comment requests that the impacts of excavation for the crib wall on redwood tree roots be addressed. During excavation for the crib wall a biological monitor and laborer will be on site to minimize loss of tree roots during excavation. Where possible, excavation will be

done by hand near roots and they will be preserved. Some loss of tree roots is expected. However redwood trees are adapted to disturbance and since root loss will be less than 50% for any single tree the health of the trees is not expected to be significantly impacted.

- P11. The comment states that dry stacked rock proposed to protect a redwood tree will not adequately support existing fills. The rock will be used to support minor fill between the tree and the new crib wall; not the existing fills.
- P12. The comment notes that an existing 24-inch redwood tree at about STA 10+55 is not shown on the plans. Comment noted. The project work will not impact the tree; the final plans will reflect this.
- P13. The comment mentions the existing large debris slide adjacent to the lower switchback. See response P7.
- P14. The comment suggests that all fill placed for this project be properly drained, keyed and benched into slopes, and compacted as engineered fill. The Tin House Road is a rural, limited use road, not open to public vehicles; its most common use will be as a hiking trail. It is not the practice of California State Parks or other land management agencies to treat such road surfaces as proposed. The road surface will be mechanically scarified and then track or wheel compacted in accordance with commonly accepted management practices. Rock drain lenses will be constructed where needed to remove water from filled areas.
- P15. The comment states that the MND does not adequately demonstrate that the proposed project will reduce the road impact to a less than significant level. The Tin House Road has been in existence for over 50 years and is stable over most of its length. The proposed work will utilize commonly accepted techniques to minimize erosion and instability. It is reasonable to conclude that the project will improve the existing condition resulting in a net benefit to the environment.
- P16. The comment states that the project only addresses temporary erosion but does not address how the road cuts through landslides and how stability of sliver fills will be affected by outsloping the road. The entire Big Sur Region is very steep and unstable, prone to landslides. It is beyond the scope of this project to address the regional problem of existing roads constructed over unstable areas. The proposed work will utilize commonly accepted techniques to minimize erosion and instability. Response P2 addresses the sliver fills and road outsloping.
- P17. Comment noted. See response P8.
- P18. The Comment states that the MND should describe which debris lobes will be removed from the creek, that removal may result in over steepening of existing banks and that mitigation measures should be provided. Appendix A of the MND, sheet six, includes ten cross sections that show the extent and depth of the fill in the vicinity of Redwood Creek that will be removed. See response P3.
- P19. The comment expresses concern about changing the flow line of the creek in the vicinity of STA 10+00 and the lack of provisions for stabilizing the fill slopes. Upon further review of the site it appears that it will not be necessary to change the creek flow line in this area. The plans

will be modified to show that the flow line will not change in this area.

- P20. The comment states that between STA 100+00 and 101+00 the new channel matches the existing channel and that restoration of the existing channel would involve removal of fill in this area. The stream channel is stable in this area with established vegetation on both banks. There is no need to remove fill from the stream channel in this vicinity to realign the road as proposed. Modification of the stream channel would be counterproductive to the goals of minimizing project environmental impacts and maintaining a stable stream channel.
- P21. The comment expresses concern about the stability of fill in the vicinity of the 84-inch diameter redwood tree. Dry stacked rock is proposed to be placed against the trunk of the redwood tree to insulate the tree from the affects of fill placed against the trunk. The soil will be stabilized in accordance with Erosion Control, Revegetation and Stormwater Pollution Prevention Plans to be prepared after engineering plans are finalized.
- P22. The comment expresses concern that the 7 to 11 feet of fill to be removed between STA 101+00 and 101+50 may create unstable cut slopes on the Schoendorf's property. The project design proposes to remove all artificial fill in this area. After the fill is removed the site will have been restored to a natural condition. It would not be accurate to describe them as "cut slopes" since they have not been cut by human action. Although the resulting slope on the Schoendorf property will be quite steep they will be similar to the adjacent steep natural slopes in the immediate vicinity.
- P23. The comment states that excavations were made on the Schoendorf property as part of the fill placement on the lower hairpin turn and expresses concern that the exposed cut slopes will likely be unstable. State Parks staff believes that all of the fill material proposed for removal originated south of the creek on what is now State Park property. It would be inconsistent with common road construction practices and beyond the ability of commonly used equipment to cut material from a slope across the creek from a road being built. It would also be counterproductive to excavate soil from a slope below the road and then fill in that same area. State Parks staff believes that it is highly unlikely that excavations were made on the Schoendorf property. See response P22.
- P24. The comment expresses concern about the potential instability of road cuts through an old debris slide immediately west of the lower hairpin. There are many old landslides and debris slides along the road and throughout the Big Sur area. It is beyond the scope of this project to stabilize areas of potential instability outside the project site. If the old debris slide does become active in the future it will be addressed at that time.
- P25. The comment states the need for crib walls to be supported on competent material and that there is no indication how fills behind the walls will be placed and compacted. This comment addresses engineering details that will be described in the contract document specifications. Those details are beyond the scope of the environmental analysis in the MND.
- P26. The comment states that Cross Sections 10+00 through 10+75 show fills extending down to the creek channel but does not show any retention of these fills. The slopes shown in these cross sections are at an angle of repose that will not require physical structures for retention. They will be stabilized by vegetation. Details will be described in Erosion Control, Revegetation and Stormwater Pollution Prevention Plans to be prepared after engineering

plans are finalized.

P27. The comment recommends that geotechnical and geologic reports be prepared to support the proposed mitigation efforts. The Tin House Road is a rural, limited use road, not open to public vehicles; its most common use will be as a hiking trail. There are no structures occupied by humans in the immediate vicinity of the road. Although it is typically not the practice of California State Parks or other land management agencies to perform geotechnical and geologic studies when maintaining or modifying roads of this type, if required by the County of Monterey, the appropriate geotechnical and/or geologic reports will be completed. Thank you for the comment.

P28. The comments express the opinion that MND and drawings do not adequately define and address geotechnical and geologic issues associated with the project. See response P 27.

Again, thank you very much for your comments.

Sincerely,

Jill Poudrette
District Environmental Coordinator