



April 30, 2007

Ms. Jenn Feinberg
Coastal Program Analyst
San Francisco Bay Conservation and Development Commission
50 California Street, Suite 2600
San Francisco, CA 94111

Re: Comments on Draft IS/MND
Turtle Back Hill Trail Accessibility Improvements, China Camp State Park

Dear Ms. Feinberg:

Thank you for your letter of April 4, 2007, commenting on the above project. Per your request, enclosed please find a plan that depicts BCDC jurisdictional lines (100-foot shoreline band and 5 feet above Mean Sea Level/Bay jurisdiction). There are proposed project activities that fall within each of these jurisdictions; quantities of each project element are broken down by jurisdiction on the attached table. As shown on the table, 440 square feet of work would take place within the Bay jurisdiction and 18,263 square feet within the shoreline band jurisdiction.

Based on your comments, the following paragraphs will be inserted into the Final MND, Chapter 3, Section IX. Land Use and Planning, Environmental Setting, p. 61, following paragraph three:

The project is subject to approval by the San Francisco Bay Conservation and Development Commission (BCDC), in compliance with the McAteer-Petris Act and the San Francisco Bay Plan (Bay Plan). Approximately 7.8 cubic yards of fill will take place in the BCDC Bay jurisdiction via placement of pilings for an elevated section of boardwalk. This fill is consistent with Section 66605 of the McAteer-Petris Act for the following reasons:

- (1) The public benefit of this small amount of fill will exceed any public detriment because the project will provide improved public access, in particular to persons with disabilities, while taking place within the existing trail footprint. Boardwalk installation will provide all-season trail access and improved outdoor educational opportunities to the general public and community school groups.
- (2) An upland alternative location would not be feasible for the purpose of this project. Location of fill is proposed along the existing trail route currently used by visitors and would thus eliminate the need for additional new trail construction. New trail construction to upland locations would involve the additional disturbance of large areas of Coast live oak alliance, Purple needlegrass alliance and California annual grass alliance plant communities. A new trail route

in this location was not necessary to meet ADA trail slope requirements or improve visitor safety. The purpose of this project was to improve ADA access and public safety while minimizing additional impacts to surrounding resources.

(3) The proposed fill is the minimum amount necessary to support the boardwalk, meet grade requirements in order to comply with the Americans with Disabilities Act and reduce harmful effects to the bay.

(4) The fill will reduce harmful effects to the Bay because the proposed boardwalk will constrain pedestrians within a more narrow area than the current trail, protecting vegetation. It is anticipated that native bay vegetation will reestablish in disturbed locations near the proposed boardwalk.

(5) The proposed fill will be constructed in accordance with sound safety standards as it will utilize an approved standard DPR design for structures located in wet areas.

The proposed project is also consistent with the Bay Plan regarding public access, tidal marshes, tidal flats, and transition zones. The primary purpose of the project is to facilitate barrier-free access. DPR has worked with the U.S. Fish and Wildlife Service and California Department of Fish and Game, incorporating results of consultations with those agencies into the final design of the project in order to minimize adverse impacts from human disturbance on wildlife and transition zone habitats. The project will relocate large sections of existing trail from transition zone to upland areas.

One trail section—the abandoned road that runs from North San Pedro Road to the road-to-trail conversion segment--will be planted with native grassland and transition zone species. This area comprises 6,725 square feet. Another net 932 square feet of the road-to-trail conversion segment will also be planted with native grassland and transition zone species.

The following sentence will be inserted into the Final MND, Chapter 3, Section IX. Land Use and Planning, Discussion, b), p. 62, following sentence two:

As discussed in the Environmental Setting above, the proposed project is consistent with the McAteer-Petris Act and the San Francisco Bay Plan.

The following references will be inserted into Chapter 6: References, Land Use and Planning, p. 93:

California Government Code, Title 7.2. San Francisco Bay Conservation and Development Commission, Chapters 1 and 2, Sections 66600-66611.

San Francisco Bay Conservation and Development Commission,
2006. San Francisco Bay Plan, amended.
www.bcdc.ca.gov/pdf/planning/plans/bayplan/bayplan.pdf

Thank you for your comments. Please do not hesitate to contact me with any further concerns.

Sincerely,

Gail Sevens
Environmental Coordinator

Enclosures