

## Addendum A. Errata and Responses to Comments

### INTRODUCTION

This Errata and Responses to Comments has been prepared as an attachment to the Environmental Assessment/Initial Study (EA/IS) for the Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project, which underwent public review from November 24, 2015 to January 15, 2016. The corrections identified in the Errata do not change the project activities nor increase the degree of impact described in the EA/IS. This Addendum is organized as follows:

- **Part 1 Errata** provides necessary changes to the text and explanations.
- **Part 2 Responses to Comments** addresses substantive comments on the EA/IS received from individuals, groups, and government agencies, and provides responses. Substantive comments are those that modify the existing alternatives, propose new alternatives not previously considered, supplement, improve, or modify the impact analysis.

### Part 1: ERRATA

As a result of comments received on the Environmental Assessment/Initial Study (EA/IS) for the Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project, certain edits, clarifications, and explanations are provided in this errata.

Inserted changes to the EA/IS are underlined and deleted text is shown as being ~~struck out~~. These changes do not change the analysis or conclusions of the EA/IS. Page and section references provided indicate where in the original EA/IS changes are made.

#### Page 4, Section 2.2

**Redwood Creek Trail Improvements and Realignment.** The Redwood Creek Trail is adjacent to or near Redwood Creek for most of the creek's reach in Frank Valley. Bridges and fords provide crossings of the main stem of the creek at various locations. The trail also crosses numerous drainages tributary to the creek. When this part of MTSP originally became state property, the Redwood Creek Trail was designated along existing roads and trails on the property. During its stewardship, CDPR has become more proactive in its trail design, working to minimize impacts to resources and reduce maintenance problems. Many existing trail facilities do not meet current CDPR trail standards and need to be replaced. In addition, during wet weather, portions of the current trail alignment in the Redwood Creek floodplain flood, resulting in standing and flowing water on the trail. This has resulted in an incised trail with poor drainage. The proximity of the trail to the creek and the multiple horse fords create numerous locations for fine sediment to enter the creek. Direct disturbance from horses and people fording the creek contributes to this problem as well.

#### Page 11, Section 3.2, third paragraph.

CDPR's trail standards were used in developing the designs for the Redwood Creek Trail Realignment, including the trail's alignment, width, and bridges. On the Redwood Creek Trail, the decommissioned segment of the trail would be abandoned and existing culverts, bridges, and other trail features removed. Headcuts and channels would be repaired and access to the decommissioned trail blocked. Brush and logs salvaged from vegetation cutting required elsewhere on the project would be spread on the trail as needed. On the newly constructed trail segment outside of the floodplain, bridges would be installed to

cross the multiple drainages leading to Redwood Creek, with retaining walls and swales installed as needed. Some trees would be removed to accommodate the new trail. On the trail segment south of Santos Meadow, crib walls and culverts across drainages leading to Redwood Creek would be removed and replaced with bridges. Consistent with CDPR standards for pedestrian and equestrian trails, the trail would be 4 feet wide, with some short 5-foot wide sections to allow for passing, at turns, or along grade changes with line of sight concerns for visitor safety. Bridges would be 5 feet wide, except the Santos Meadow Bridge across Redwood Creek, which would be 6 feet wide.

**Page 11, Section 3.2, new paragraph after paragraph 3**

The Redwood Creek Trail project components are consistent with the Mount Tamalpais State Park General Plan and are within the level of land use and development identified in the Frank Valley area of the park. The General Plan states “The Frank Valley area adjacent to Muir Woods was added to the park for the purpose of preserving the area’s natural values and to provide additional recreational opportunities.” The General Plan also states “Redwood Creek, which runs through Frank Valley, has been identified by the California Coastal Plan as an important resource deserving special protection.”(GP 1979, p46)

**Page 13, Section 3.2, new paragraph after paragraph 1**

The Dias Ridge Trail Extension was described in the 2007 Dias Ridge Restoration and Trail Improvement Project EA/IS which includes in the Purpose and Need section “ Improve the trailhead at the Golden Gate Dairy to facilitate possible future plans by Marin County, Caltrans, and NPS along the State Route 1 (SR1) corridor” and in the Scope of the Analysis section “Parallel Connector Trail Following State Route 1 between Golden Gate Dairy and Frank Valley Road (Possible Implementation in 2008/09 or later)” and it is noted that it requires a separate NEPA/CEQA analysis (NPS & CDPR 2008, p.1,2). It is also described in the Golden Gate National Recreation Area and Muir Woods National Monument General Management Plan (GMP). The GMP states, “The National Park Service would also continue to work with Caltrans to improve the safety of State Route 1 for park visitors, including traffic calming and improved pedestrian crossing, and also to complete the trail connection between Dias Ridge and Redwood Creek trails.” (NPS 2015, p. 126).

**Page 13, Table 1**

**Table 1. Project Features** *[See Figure 2 for Locations]*

Feature Name	Feature Description	Location	New Materials	Materials Removed
<b>Redwood Creek Trail Realignment</b>				
Bridge 1	Replace pedestrian bridge with equestrian bridge	On existing trail alignment, crosses Redwood Creek between Miwok Trail and Muir Woods Rd.	80 ft long x5 ft wide galvanized steel, <u>aluminum, or redwood</u> stringer bridge with redwood decking and handrails	62 ft bridge, wooden trestle, concrete abutments
Bridge 2	Construct bridge on new trail alignment	On new trail alignment, crosses a seasonal tributary of Redwood Creek near the intersection with Miwok Trail	32 ft long x 5 ft wide galvanized steel, <u>aluminum, or redwood</u> stringer bridge with redwood decking and handrails	

**Table 1. Project Features** [See Figure 2 for Locations]

Feature Name	Feature Description	Location	New Materials	Materials Removed
Bridge 3	Construct bridge on new trail alignment	On new trail alignment, crosses an ephemeral tributary of Redwood Creek	17 ft long x 5 ft wide <u>galvanized steel, aluminum, or redwood</u> stringer bridge with redwood decking and handrails	
Bridge 4	Construct bridge on new trail alignment	On new trail alignment, crosses an ephemeral tributary of Redwood Creek	15 ft long x 5 ft wide <u>galvanized steel, aluminum, or redwood</u> stringer bridge with redwood decking and handrails	
Bridge 5	Construct bridge on new trail alignment	On new trail alignment, crosses an ephemeral tributary of Redwood Creek	24 ft long x 5 ft wide <u>galvanized steel, aluminum, or redwood</u> stringer bridge with redwood decking and handrails	
Bridge 6	Construct bridge on new trail alignment	On new trail alignment, crosses a perennial tributary of Redwood Creek	26 ft long x 5 ft wide <u>galvanized steel, aluminum, or redwood</u> stringer bridge with redwood decking and handrails	
Bridge 7	Construct bridge on new trail alignment	On new trail alignment, crosses an ephemeral tributary of Redwood Creek	26 ft long x 5 ft wide <u>galvanized steel, aluminum, or redwood</u> stringer bridge with redwood decking and handrails	
Bridge 8	Construct bridge on new trail alignment	On new trail alignment, crosses an ephemeral tributary of Redwood Creek	22 ft long x 5 ft wide <u>galvanized steel, aluminum, or redwood</u> stringer bridge with redwood decking and handrails	
Culvert Removal 1	Remove culvert and retaining walls, restore banks to natural grade, install erosion control material and plant native vegetation	Trail to be decommissioned crossing ephemeral tributary near intersection with Miwok Trail	Erosion control materials, cobble if needed for channel bed	4 ft diameter corrugated metal culvert and rock walls
Headcut Repairs	Decommission trail near headcuts such that water is not concentrated into headcut area. Fill the top of the headcut with soil, cover with erosion control material and plant native vegetation.	On trail to be decommissioned across from Kent Canyon	Native soil, erosion control materials	

**Table 1. Project Features** [See Figure 2 for Locations]

Feature Name	Feature Description	Location	New Materials	Materials Removed
Culvert Removal 2	Remove culvert, regrade channel, install erosion control material, install large rocks to form cascade channel, plant native vegetation.	Where trail to be decommissioned crosses perennial tributary (downstream from Bridge 6)	1/4 ton rock and smaller rock to fill voids	2 ft diameter concrete culvert and accumulated sediment
Culvert Removal 3	Remove culvert and retaining walls, restore banks to natural grade, install erosion control material and plant native vegetation	Trail to be decommissioned crossing ephemeral tributary flowing from the west	Erosion control materials, cobble if needed for channel bed	4 ft corrugated metal culvert and wood retaining walls
Bridge 9; Santos Meadow Bridge	Construct bridge over Redwood Creek and connecting trails, decommission ford through creek	Connecting Santos Meadow Horse Camp to Redwood Creek Trail	110 ft long x 6 ft wide galvanized steel truss bridge with redwood decking and handrails	
Bridge 10	Remove crib wall, install rock armoring in channel, install bridge	On existing trail alignment, near Spur Trail	19 ft long x 5 ft wide galvanized steel, <u>aluminum, or redwood</u> stringer bridge with redwood decking and handrails	Wood and rock crib wall in channel
Bridge 11	Remove crib wall, install rock armoring in channel, install bridge	On existing trail alignment	24 ft long x 5 ft wide galvanized steel, <u>aluminum, or redwood</u> stringer bridge with redwood decking and handrails	Wood and rock crib wall in channel and channel banks
Bridge 12	Remove crib wall and bridge, install rock armoring in channel, install longer bridge	On existing trail alignment	20 ft long x 5 ft wide galvanized steel, <u>aluminum, or redwood</u> stringer bridge with redwood decking and handrails	Wood and rock crib wall in channel and channel banks; 15 ft wood bridge
Bridge 13/ Culvert Removal 4	Remove culvert 4, install rock armoring in channel, install bridge	On existing trail alignment, near southern end of trail	26 ft long x 5 ft wide galvanized steel, <u>aluminum, or redwood</u> stringer bridge with redwood decking and handrails	4 ft diameter corrugated metal culvert, wood and rock crib wall in channel and wood hand rails
Bridge Removal 1	Remove bridge and abutments, decommission horse fords	On trail to be decommissioned, Redwood Creek crossing		40 ft long x 4 ft wide aluminum stringer bridge, concrete abutments, wooden trestle, and wood retaining wall
Bridge Removal 2	Remove bridge and abutments, decommission horse fords	On trail to be decommissioned, Redwood Creek crossing		70 ft long x 4 ft wide aluminum stringer bridge, concrete abutments, and metal trestle
Spur Trail Rock Wall	Install rock retaining wall and rock armored swale crossing, where trail is being undercut	Spur Trail is south of Santos Meadow, connecting Muir Woods Rd to Redwood Creek Trail	1/4 ton rock and smaller rock to fill voids	

**Table 1. Project Features** *[See Figure 2 for Locations]*

Feature Name	Feature Description	Location	New Materials	Materials Removed
<b>Dias Ridge Trail Extension</b>				
Drain Lenses	Rock installed below the trail tread surface to aid drainage and maintain drier trail surface	As needed	Rock	
Retaining Wall	Install Sutter-type retaining wall (vertical steel and horizontal wood members) where needed to maintain accessible grade	1-2 locations as needed	Steel beams and wood	
Tree windrow	Trees in poor condition	Existing windrow	New trees	Trees in poor condition

## Page 32, 4.2 Cumulative Impacts

Cumulative impacts are evaluated in the cumulative impact analysis provided in conjunction with the impacts of each alternative to determine if they would have any additive effects on a particular natural resource, cultural resource, visitor use and experience, or the socioeconomic environment.

Examples of projects that have been completed or are in the process of being planned or implemented that are relevant to the cumulative impact discussion include:

- Dias Ridge Trail Restoration and Trail Improvement Program
- Marin Equestrian Stables Plan
- Deer Park Fire Road and Dipsea Trail Rehabilitation and Drainage Improvements
- Bootjack Trail Repair
- GGNRA Fire Management Plan
- Muir Woods National Monument Sustainable Access Project

Subsequent to publication of the Redwood Creek and Dias Ridge Connector Trail Draft EA, the cumulative impact analysis for the Muir Woods National Monument Sustainable Access Project Final EA was published (May 2017) and is included here by reference.

## Pages 49, Traffic and Transportation

### ***Impact of Alternative B (Proposed Project)***

A less than 0.1% increase in visitor traffic and 4% increase in parking demand is anticipated related to new trail users. Currently, Redwood Creek Trail is estimated to have an average of 67 weekend users and 33 weekday users. By 2020, under a high visitor growth scenario for the preferred alternative, completion of the proposed action would increase Redwood Creek Trail visitors to 100 weekend users and 51 weekday users. On Dias Ridge Trail, currently there are estimated to be 112 weekend and 50 weekday users. By 2020, under the preferred alternative, this is estimated to increase to 160 weekend users and 74 weekday users following project completion. Based on these levels of trail use, the proposed project has the potential to add up to an additional 18 average daily weekend vehicle trips and 8 average daily weekday vehicle trips to Muir Woods Road and Highway 1. The effect would be a less than a 0.1% (one-tenth of 1 percent) increase in traffic over the course of the day as compared to existing conditions- (Fehr & Peers,

2016). The trail extension would result in minor improvements to the traffic movement and safety along Highway 1 by removing the need for ~~trail users to walk along~~ visitors to use the shoulder of the highway to connect between the Redwood Creek and Dias Ridge trails. Parking and access to the trail would remain the same as existing conditions. In addition, a less than significant short-term increase in vehicular traffic would occur during construction, which would occur in stages over four or five dry-season construction periods. The number of construction vehicles needed to complete the proposed Project is minimal and would not contribute substantially to traffic in the Project area. This would include trucks delivering rock material for trail and wall construction, erosion control materials, and materials for bridge or wall construction, as well as removing construction and demolition debris. Personal vehicles of contractors and their workers would also be on the road. This would occur during Bridge 9 installation and Culvert 2 removal. This would be a small workforce and occur over a short period. As needed, workers could carpool from designated parking. Some traffic impacts would occur during the delivery of crane and bridge pieces, but this also would be short-term and would be coordinated with the County and California Highway Patrol.

**Cumulative effects.** The Proposed Project Alternative would contribute a negligible amount to cumulative impacts on traffic and transportation when combined with other past, present, and future projects. The increase in traffic due to construction activities would be short-term and seasonal, and — because of the rural nature of the area — unlikely to overlap with impacts from other projects. No increase in visitor traffic is anticipated. The less than significant short-term increase in traffic during construction would not contribute substantially to traffic congestion. There would be no impacts to access to recreational resources in the area as a result of the Proposed Project Alternative.

**Conclusions.** The Proposed Project Alternative would result in negligible short-term and long-term adverse effects to traffic and transportation in the Project area as a result of increased vehicular traffic from construction vehicles and additional trail users after Project completion. There would be no impacts to access to recreational resources as a result of the Proposed Project Alternative. Under CEQA, this alternative would result in less than significant impacts (Class III) to traffic and transportation.

## Pages 52, References

California Department of Parks and Recreation. 1979. Mount Tamalpais State Park General Plan.

Fehr & Peers. 2016. Memorandum: Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project – Visitation, Traffic & Parking Assessment. June 24.

National Park Service. 2017. Muir Woods National Monument Sustainable Access Project Final Environmental Assessment. May 2017, San Francisco, California

National Park Service/Golden Gate National Recreation Area. 2015. Golden Gate National Recreation Area, Muir Woods National Monument General Management Plan/Environmental Impact Statement. 2015, San Francisco, California

National Park Service. 2015. NPS NEPA Handbook

National Park Service. 2011. Directors Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making. Washington, DC

National Park Service and California Department of Parks and Recreation. 2007. Dias Ridge Restoration and Trail Improvement Project EA/IS.

## Part 2: Responses to Comments

Comments received as a result of public review of the EA/IS are addressed in this section. Scoping comments received prior to publication of the EA/IS were duly considered in preparing the document.

On November 24, 2015 the Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project Environmental Assessment/Initial Study was released for public review. On January 8, 2016 the comment period was extended by one week. The formal comment period closed on January 15, 2016. The EA/IS was circulated to local, state, and federal agencies, interested organizations, and individuals to allow review and comment on the report. Publication of the EA/IS on the National Park Service Planning, Environment and Public Comment (PEPC) website (<http://parkplanning.nps.gov/>) and at the State Clearinghouse marked the beginning of the public comment period during which written comments were accepted. A public meeting was held on December 3, 2016 to review the project alternatives and answer questions. Written comments were also accepted at this public meeting.

During the public comment period, 251 pieces of correspondence were received in the form of letters, emails, written comments at the public meeting, or via the PEPC system. Comments were identified and sorted thematically, according to the concern they discussed. Many pieces of correspondence included multiple topics (i.e., themes).

The responses to comments are in two sections:

- **Themed Master Responses to Comments.** This section responds to comments that were similar in nature and which have been grouped together by theme. These comment themes are labeled M1 through M14.
- **Responses to Specific Comments.** This section responds directly to three longer letters that included multiple involved comments. For purposes of responding, these letters are labeled Letter S1, Letter S2, and Letter S3.

### Themed Master Responses to Comments

#### M1. Bicycle Impacts and Bicycle Use Enforcement

There were 16 comments regarding the impact of bicyclists on other trail users. The comments emphasized the need for enforcement to ensure that bicyclists do not use trails where they are prohibited. The comments expressed concern that bicyclists create unsafe conditions for other trail users. Comments also suggested that there are few hiker and equestrian only trails and that the Dias Ridge Trail Extension could compromise safety on the Redwood Creek Trail and Miwok Trail if it encourages illegal bicycle use on those trails.

The following are representative comments:

- “I feel poaching has increased since the Dias [Trail] was built rather than decreasing bike traffic because the trail has attracted far more users.”
- “There is a need for greater enforcement of illegal bike use; need for fines. Signs are not effective. Need to better monitor illegal use. Need to identify a budget for enforcement.”
- “Need to identify best ways to ensure no illegal use – update maps. Consider providing a map that makes it very clear what legal bike routes are in the area.”

## **M1. Response**

The Golden Gate National Recreation Area (GGNRA) and Mount Tamalpais State Park (MTSP) are dedicated to providing a broad range of recreational opportunities for many different types of trail users. Managing an area with multiple user groups requires a multi-tiered approach. This approach, often referred to as the “four E’s,” uses engineering, enforcement, education, and emergency response to ensure long term and consistent compliance with regulations. During the planning of this project, careful consideration was given to trail design to ensure each trail segment is appropriate to and encourages compliance with the intended type of recreational use. This includes trail width, line of sight, slope, and other standards consistent with trails intended for hikers and equestrians.

Park staff will continue to work with local bike organizations to reach out to their membership regarding appropriate trail use. There are a number of maps available through the National Park Service (NPS), California Department of Parks and Recreation (CDPR), bicycle organizations, privately published maps, and recreational guidebooks to help bicyclists identify and choose legal bicycle routes. Additional signage will be used to clarify and reinforce legal trail use. The sign on the Dias Ridge Trail at the bridge near the Golden Gate Dairy will re-iterate permitted uses on nearby trails. Law Enforcement will continue to monitor and regulate use on all trails, and can be called if illegal behavior is observed on a trail.

The GGNRA and CDPR have designated the trails in Marin over which they have jurisdiction as being limited to particular types of trail users. The trail designations indicate what combination of hiker/equestrian/cyclist use is permitted on a particular trail. In addition, they are included in the GGNRA Superintendent's Compendium, which is available on the NPS GGNRA website.<sup>1</sup> According to the Superintendent's Compendium, page 35, bicycle speed limits are 15 mph on designated bike routes and 5 mph on blind curves.

## **M2. Bike Calming Design Features on Dias Ridge Trail Extension**

There were four comments about including bicycle calming measures in the Dias Ridge Trail Extension design. Commenters requested trail design features or signage to slow bicycle traffic speeds at the base of the existing Dias Ridge Trail and at the entrance to the equestrian facilities at the Golden Gate Dairy on Shoreline Highway. Additionally, comments expressed concern over the lack of proper trail etiquette on existing trails in the area.

The following are representative comments:

- “My main concern about the Dias Ridge Trail connection is how it will cross the driveway of the Golden Gate Dairy Stables.”
- “Speed is our primary complaint with the bike community and all bikers tend to pick up speed as they head down that last stretch, often skidding to a stop in our parking lot.”
- “The Dias Ridge Extension project should include design elements on the existing Dias Ridge Trail that force bikes to slow as they approach the extension itself, so that there can be no chance encounters with equestrians or walkers.”
- “Need to anticipate the possibility of user conflicts and install features to avoid them. Three user groups — equestrians, hikers, and mountain bikes — enjoy the network of trails in GGNRA and Mt. Tamalpais State Park.”

---

<sup>1</sup> <https://www.nps.gov/goga/learn/management/lawsandpolicies.htm>

## **M2. Response**

The Dias Ridge Trail Extension will be designed in accordance with GGNRA's standards for multi-use trails to be safe for all users. The trail material will be made out of a firm and stable material with cross slope and running grade to meet the outdoor accessible trail standards. The Dias Ridge Trail Extension will range from six feet to eight feet wide to allow for users to pass each other going in both directions. The trail tread will include few or no obstacles, such as large rocks or roots, and will incorporate a narrow, shoulder which will be cleared to limit overhead obstructions such as low branches. The trail alignment is designed with appropriate sight lines in order to create a safe experience for all users.

Detailed design aspects of any speed-calming measures will be determined with stakeholder and staff involvement in order to minimize potential user conflicts, particularly at the base of the existing Dias Ridge Trail, where the Extension Trail crosses the driveway to the equestrian facilities, and where the Extension Trail terminates. GGNRA will continue to work with Trail Partners to promote their "Go Slow and Say Hello" campaign and will meet with equestrian and bicycle stakeholders to determine the best design and messages to communicate the appropriate speeds and trail etiquette. GGNRA typically posts a yield sign at trail intersections or potential conflict points to remind trail users of appropriate trail etiquette.

## **M3. Design Features to Reduce Illegal Bicycle Use on Redwood Creek Trail and Miwok Trail**

There were 10 comments about installing design features at trail heads and trail connections to clearly indicate which trails are open for bicycle use and which are not, and to slow bicyclists. Commenters noted that currently there is too much illegal bike use on Redwood Creek Trail and Miwok Trail. Suggestions included installing larger or more effective signage, ensuring signs are at all trail connections, and possibly posting fine amounts. Other commenters felt that signs are not effective. Suggestions were also made for physical barriers (bollards, gates, stiles, barriers, or a series of pinch points) with a focus on the intersection of Redwood Creek Trail with the Dias Ridge Trail Extension, Muir Woods Road, and Miwok Trail to discourage bicyclists from using the Redwood Creek Trail.

The following are representative comments:

- "I think that it would be a good idea to put 'bollards' at points along the trail to discourage bikes, where they are not permitted."
- "Dias Ridge Trail was constructed as a multi-use trail for all three user groups [equestrians, pedestrians, and bicyclists], and the extension will continue this shared use to the connection with the Redwood Creek Trail, where mountain bikes are restricted from use. It is essential that features be included in construction that insure safety for all users at and near this connection, e.g., a barrier or sequence of "pinch points" (not just a large sign) that forces bikes to slow to a walking speed and diverts them away from the Redwood Creek Trail, without impeding equestrians."
- "I hope there will be adequate signage for visitors so that cyclists will be more discouraged from using trails where they are not allowed. If, when the system is complete, stiles would help keep bicycles where they belong, I hope they will be considered."

## **M3. Response**

The intention is to maintain the Redwood Creek Trail and Miwok Trail as hiker and equestrian only trails, and to install new signs to clearly identify trails which allow bicycles and those which do not. New signage will be installed at trail intersections including the intersection of Redwood Creek Trail with the Dias Ridge Trail Extension, Muir Woods Road, and Miwok Trail. In addition, signage will be added on the Miwok Trail at its intersection with the Dias Ridge Trail. Physical barriers such as bollards are not included in the current trail design as they are difficult to maintain, can be ineffective, and are not included in the CDPR

standard designs for hiker and equestrian trails. However, when the Dias Ridge Trail Extension is extended to connect directly to the Redwood Creek Trail, CDPR and NPS will work with stakeholders to adaptively manage this intersection; and will consider using CDPR physical barriers designs.

#### **M4. Design Recommendations for Environmental Protections**

There were three comments suggesting methods to protect natural resources during and after trail construction. Commenters suggested that fencing be added to the trail edges to keep visitors on the trail, that pressure-treated wood (which may contain copper) not be used so as to avoid contaminated run-off, and that the construction contractor be closely supervised to ensure that natural resources are protected.

The following is a representative comment:

- “I want the contractor to be well supervised, to ensure that the creek is not impacted by the construction. Loose soil debris should be kept out of the streambed, and when not supervised, contractors will only loosely comply.”

#### **M4. Response**

Measures will be taken to ensure protection of natural resources during construction. In addition to CDPR and NPS standard BMPs for trail construction, the project will include a stormwater pollution prevention plan and other measures to minimize construction impacts to habitat and water quality and will comply with Regional Water Quality Control Board, California Department of Fish and Wildlife, US Fish and Wildlife, and National Marine Fisheries Service requirements. Temporary fencing and/or natural barriers are typically used to close informal trails, protect sensitive habitat, and to keep visitors on the trail. Temporary fencing and/or natural barriers will be considered in other areas if there is evidence of informal trails developing. Pressure-treated wood is not being considered for any of the wooden structures on the Redwood Creek Trail. Wood for bridges and other structures will be sustainably-harvested redwood. The majority of the trail work will be conducted by the California Conservation Corps (CCC) working with CDPR Trail Crew staff. Private contractors will be used in a few specific areas, including large bridge installation. Biological monitors will be working closely with construction staff on all elements of project implementation to ensure that water, vegetation, and wildlife protection measures are followed. Please see EA/IS Section 3.5, Impact Reduction Measures.

#### **M5. Trail Design for Equestrian Use and Safety**

There were six comments about designing the trail to best meet the needs of equestrians and to improve safety. The following items were noted:

- Ensure bridges are level.
- Ensure all parts of the trail, especially bridges, have good sight lines.
- Research non-slip surfaces for bridges. Wooden bridges are slippery when wet. Use rough-sawn timber if possible to reduce slickness. Don't put the decking on vertically [parallel with direction of travel]. A gravel or soil bridge surface is preferred; bridge surface should be similar to trail tread in appearance and texture. Do not use horizontal boards topped by an additional raised central tread running parallel to the bridge.
- Wider bridges are better, as wide as possible for horses.
- For Santos Meadow Bridge, provide stump mounting blocks on each end for equestrians who prefer to dismount and walk horses across.

- Resurface the RWCT where the big rock was added in the past. All new tread should be appropriate for horses — no big or sharp-edged rocks.
- Do not install rolling dips such as those used on Coyote Ridge or the Coastal Fire Road.
- Minimize out-sloping to what is needed.
- Consider using the Forest Service document with back country design for horses.
- Take the height of a rider on a horse into account for tree trimming.

The following are representative comments:

- “In building the 13 proposed bridges, please ensure that the bridges are level, with good sight lines, and with a non-slip surface for the horses. With the 110' long bridge, crossing over to Santos Meadow, please provide stump mounting blocks on each end for equestrians who prefer to dismount and walk their horses across. The first section of Redwood Creek Trail ...was resurfaced last year with large gravel unsuitable for horse use. In building the trail, please ensure the footing is appropriate for horses.”
- “My only concerns are about the bridges that are planned. There are a lot of them and they can be a great impediment to safe riding and trail sharing. ... The surface of each bridge needs to appear to be as much like the trail it is a part of as possible. Wooden bridges are often treacherously slippery, especially when they are wet. Research into the best surface for all purposes is essential.”
- “The netting/webbing over wood (for bridge decking) that was suggested at the meeting is more useful for human grip than for metal horse shoes but this could be researched. Anything like that would need to be fastened down 100% perfectly ... The wider the bridge, the more horse friendly. 8' would be better than 6'. 10' would be better than 8'. ...The better the sight lines, the better for all users to know someone else is there.... It would be good of course if the height of a rider on a horse were taken into account for any tree trimming specs.”

## **M5. Response**

One of the goals of this project is providing a pleasant and safe experience for equestrians. CDPR standards for equestrian trails will be used as the basis for trail design. These trail standards were developed based on decades of experience in State Parks across California and have been reviewed and approved by CDPR Trails staff. The trail designs focus on sustainability, safety, and resource protection based on a thorough understanding of the needs and impacts of different user groups.

All of the design concerns noted in comments will be taken into account when designing the trails and bridges. Larger rock used in the trail tread for drainage will not be exposed; it will be buried under a smaller-sized rock and soil mixture suitable for equestrian use. No rolling dips are planned for this trail. The trail out-slope will follow established standards to ensure sheet flow of water across the trail. Pruning and trail clearing guidelines from the CDPR will be followed to allow for 14 feet of vertical clearance above the trail tread.

Bridges and bridge approaches will be designed to create a level surface and longer sight lines. Closely-spaced horizontal redwood decking is the standard used by CDPR. Additions or modifications to the standard decking to reduce slipping will be considered. The shorter bridges are planned to be five feet wide. The long bridge at Santos Meadow is planned to be six feet wide. Mounting blocks will be installed at either end of the Santos Meadow Bridge.

## M6. Redwood Creek Trail Bridge Design

There were seven comments about the design of the bridges on the Redwood Creek Trail. The following concerns were noted:

- It is important to maintain a rustic aesthetic.
- Why are so many new bridges needed? Too many bridges may disrupt visitor experience of simple trail experience and being close to Redwood Creek.
- The Santos Meadow Bridge is long and could be visually intrusive. Will it look like Muir Beach Bridge and be out of place with its surroundings?
- Clarify location of Santos Meadow Bridge.
- Design should take into account storm surges and 25 year flood water surface elevations.
- Is Trex a longer lasting material — would it be a better material choice?
- Clarify railing height.
- Construction impacts of bridge installation.

The following are representative comments:

- “I have GRAVE concerns about the scale of the proposed bridges and in particular the bridge proposed for the trail head at Santos Meadow. Why does it need to be 110 feet long? What other designs have been considered? Were designers and even artists involved in the planning at the table alongside engineers? If not, why not?”
- “I'm very confused about why this little-travelled trail needs an expansion [to] six feet wide with more than a dozen new bridges.”
- “I am not looking forward to the way the RCT realignment will change the old time trail feel that is there now. It will be a shame but I do recognize the need for this to happen to ensure safety and especially salmon habitat. Thirteen bridges?! Wow! I can't imagine that and hope it doesn't destroy the feel of it but am thankful horse bridges are being taken into consideration.”

## M6. Response

CDPR designs its trails based on CDPR statewide standards. These standards include installing facilities that are most appropriate for the site-specific terrain in order to allow access and protect natural resources. Based on the site-specific conditions of Redwood Creek and its tributaries, bridges were identified as the most appropriate facility in 13 locations. For the Redwood Creek Trail Realignment Project, primary goals included moving the trail away from Redwood Creek, out of the floodplain and onto the toe of Dias Ridge. This allows for habitat improvements in the Redwood Creek riparian corridor, and out-sloped trail installation, which promotes sheet flow of water over the trail to ensure better winter trail conditions and reduced sediment transport. There are numerous small drainages that flow from the top of Dias Ridge to Redwood Creek. Many of these drainages are incised and have formed channels, which rock armored crossings would not be able to effectively span. Bridges were chosen to cross these drainage channels, rather than culverts, crib walls, or other means that involve channel disturbance or partial filling, as they do not impact the natural drainage regime with effects such as changes in channel grade and headcutting. Only two of the new bridges will cross Redwood Creek; one would be a replacement for the furthest north bridge (Bridge One) and the other is the new bridge near Santos Meadow. Hydrologists have determined the 100 year flood event water surface elevation for the two bridges that will cross Redwood Creek, and the bridges are designed to be higher than this elevation plus freeboard for woody debris passage. The smaller bridges over the drainage channels and tributaries to Redwood Creek have abutments set approximately two feet back from the top of bank and are elevated approximately eight to

12 inches above the top of bank elevation, providing space for larger flow events and the movement of woody debris.

All of the bridges will follow CDPR standard designs and will be similar in appearance to bridges on the nearby Bootjack Trail. These bridges have redwood decking and railing, with steel, aluminum, wood, or fiberglass support beams. Railing height is 60 inches from the top of the bridge decking, per equestrian bridge standards. The planned width for all bridges except the Santos Meadow Bridge is five feet. The Santos Meadow Bridge is planned to be six feet wide.

Trex (a composite decking) was not considered for bridges or other features on the Redwood Creek Trail. Both CDPR and NPS have experimented with Trex and other plastic wood materials on past projects and have found that they do not stand up to average wear and tear on trails.

### ***Santos Meadow Bridge***

The planned Santos Meadow Bridge is 110 feet long. The bridge will cross Redwood Creek, connecting the existing spur trail from Muir Woods Road to the Redwood Creek Trail. The bridge will not cross Muir Woods Road. This location is a wide area of the creek floodplain, with wide floodplain terraces and high-flow side channels that carry water during large storm events. The longer bridge spans the side channels and floodplain terraces to allow for lateral creek movement under the bridge and changing hydrology; it also reduces the chance that the bridge abutments would be affected during large storms or would collect woody debris that could damage the bridge, and that can otherwise flow down-stream past the bridge and provide habitat benefits.

The draft design of the Santos Meadow Bridge incorporates a steel truss, but uses the same materials, decking type, and railing height as the other bridges. In order to construct a bridge that spans the channel without in-stream supports, a steel truss structure was chosen that closely mimics the lines of the State Park standard bridge design. Other designs were considered, but were not able to meet the free-span requirement to bridge the channel. The bridge design requires the truss to be six feet wide for structural integrity. The steel would be coated or treated to look weathered and blend into the surroundings. The decking and top handrail would be redwood.

### ***Proximity to Redwood Creek***

In order to protect water quality, there no longer will be an opportunity for horses to drink from Redwood Creek or its tributaries. A new horse watering trough will be installed at Santos Meadow.

The two bridges that cross Redwood Creek provide space and opportunity for visitors to be close to the creek, and there will be numerous areas along the new trail alignment to experience smaller drainage channels and associated riparian vegetation. There will not be any fords or other designated means for visitors to interact directly with Redwood Creek; this will help protect the sensitive habitat of the creek and its riparian vegetation.

## **M7. Trail Width**

There were six comments about the width of the Dias Ridge Trail Extension and the Redwood Creek Trail, and the potential impacts to visitor use. Commenters noted that wider trails encourage bike use and that the Redwood Creek Trail should be made as narrow as possible to discourage bicyclists. Several commenters noted that the width of the Redwood Creek Trail was not included in the EA/IS.

The following are representative comments:

- “I question the decision to make the first section of the trail six feet in width. This size completely changes the character of the trail...this width allows bikers to go at some speed along the "trail".
- “While new bridges are determined to be five feet in width to allow equestrian and hikers to safely pass, there is no indication of trail width for Redwood Creek Trail. The current width near Hwy One appears to be four feet with some ingrowth of vegetation. Trails limited to four feet wide with a few wider areas for equestrian/hiker passing should be more than adequate as five feet wide trails are more likely to encourage bicyclists to ignore the prohibited use.”
- “The expansion of the Redwood Creek Trail to be six feet wide will invite unauthorized use by bicyclists during both the daytime and nighttime.”

### **M7. Response**

The Dias Ridge Trail Extension will be six to eight feet wide with variation in width based on safety and line of sight concerns. The Redwood Creek Trail tread width will follow the CDPR standards for equestrian trails, which calls for a four foot wide trail with some five foot wide sections to allow for passing and at turns or grade changes with line of sight concerns. The only part of the Redwood Creek Trail that will be six feet wide is the Santos Meadow Bridge.

### **M8. Traffic and Parking Pressure**

There were 20 comments relating to concerns over potential traffic impacts and associated impacts to the neighboring community, natural resources, and safety.

The following are representative comments:

- “Need a safety, parking, and traffic study and visitor use analysis.
- “There will be more traffic.”
- “There will be more illegal roadside parking.”
- “Need a study of contaminants in the creek”
- “Need a study of the carrying capacity, and watershed health across the watershed.”
- “Emissions of shuttles and tour buses should be considered”

### **M8. Response**

In response to these comments, GGNRA and MTSP conducted an analysis of parking and visitor use for the Redwood Creek Trail and Dias Ridge Trail. Due to low increases in trail use and associated traffic under a high-growth scenario, staff anticipates a negligible impact to traffic, parking, visitor experience, and safety. Project Managers in the Redwood Creek Watershed will coordinate project implementation schedules to reduce impacts to parking, traffic, and visitor experience. Implementation of the Muir Woods Reservation System will include additional law enforcement of illegal parking and adaptive management of parking in the Muir Woods Road corridor. The analysis found the following:

#### ***Visitation***

The trails see very low use. The parking and visitor use analysis (Fehr and Peers, 2016) estimates current use, use in 2020 under the no action alternative, use in 2020 under the preferred alternative, use in 2030 under the no action alternative and use in 2030 under the preferred alternative. Table 1 shows average weekend and weekday, use rates for Redwood Creek Trail and Dias Ridge Trail as estimated in the parking and visitor use analysis.

**Table 1. Visitor Use Numbers**

Timeframe		Redwood Creek Trail, Visitors	Dias Ridge Trail, Visitors	Redwood Creek Trail, Vehicles	Dias Ridge Trail, Vehicles
Current Use	Weekday	33	50	12	18
	Weekend	67	112	24	40
No Action Alternative, 2020	Weekday	41	59	15	21
	Weekend	80	128	29	46
Preferred Alternative, 2020	Weekday	51	74	18	26
	Weekend	100	160	36	57
No Action Alternative, 2030	Weekday	49	70	18	25
	Weekend	96	154	34	55
Preferred Alternative, 2030	Weekday	61	88	22	31
	Weekend	120	193	43	69

From Fehr and Peers, 2016

The existing total annual use of Dias Ridge Trail is estimated to be approximately 25,925 users, and Redwood Creek trail approximately 15,548 users. Visitor use on Dias Ridge Trail is based on one year of daily counter data from a permanent counter on Dias Ridge Trail (February 24, 2015 to February 23, 2016). An estimate of Redwood Creek Trail use was based on a three week sample of daily counter data from a temporary counter placed on Redwood Creek Trail (February 4, 2016 to February 24, 2016), that was then correlated to the use of the Dias Ridge Trail during this same period. This established a use ratio between the trails that was used for estimating the annual use of the Redwood Creek Trail. The permanent, automated trail counter on the Dias Ridge Trail was installed in February, 2015, and the temporary, automated trail counter was installed on Redwood Creek Trail in February, 2016. The Dias Ridge Trail counter is located southeast of the trailhead at Shoreline Highway (SR-1) and Pacific Highway. The Redwood Creek Trail temporary counter was located southeast of Muir Woods Road near the intersection of the Redwood Creek Trail and Miwok Trail.

It is expected that trail use on Redwood Creek Trail and Dias Ridge Trail will increase over time, regardless of any trail changes in the area, due to upward trends in use and a generally increasing population across the Bay Area. The Golden Gate National Recreation Area and Muir Woods National Monument General Management Plan (GMP) describes regional population growth and increased park visitation (NPS 2014, Volume 1, p. 279). Historic user counts on Redwood Creek Trail and Dias Ridge Trail prior to 2015 are unavailable, so an annual growth rate for these trails was estimated to be 1.9% (compounded), based on a composite growth rate of destinations in the Redwood Creek Watershed. Existing visitation counts from 2015 and 2016 were escalated using the 1.9% rate to estimate 2017 trail use.

### ***Muir Woods Displaced Visitors***

The NPS has approved and is in the process of implementing a reservation system that will support management of visitation at Muir Woods National Monument to levels that meet park goals for safety, resource protection, visitor experience, and public access. The system will manage the number of vehicles and visitors in Muir Woods. Implementation of the system is expected to displace approximately 81,000 visitors per year. A portion of the displaced Muir Woods visitors may choose to use Dias Ridge Trail or Redwood Creek Trail as an alternative to visiting Muir Woods or they may choose to park outside of designated Muir Woods parking areas and hike along Dias Ridge Trail or Redwood Creek Trail to access Muir Woods. Based on the distance to Muir Woods from Dias/Redwood Creek trailheads, it is expected that approximately 5% of displaced visitors would use the trail for the reasons cited above. This is based on the National Highway and Traffic Safety Administration's National Survey of Pedestrian and Bicyclist Attitudes and Behaviors (2002) (as cited in Fehr and Peers, 2016).

### ***No Action Alternative***

Under the No Action alternative it is estimated that trail visitation will increase at a rate consistent with recent annual growth rates (estimated for the trail to be approximately 1.9% per year) as well as an increase from displaced Muir Woods visitors (estimated to be approximately 5% of displaced, or approximately 4,000 per year), who are unable to access Muir Woods parking following the January 16, 2018 implementation of a reservation system for the national monument. Under the no action alternative, by 2020 the average daily trail use on Redwood Creek Trail is expected to increase to 80 users (from 67 existing) on weekends and to 41 users (from 33 existing) on weekdays. This is an increase of 13 daily weekend and 8 daily weekday users as compared to existing use levels. Dias Ridge Trail average daily trail use would increase to 128 users (from 112 existing) on weekends and to 59 users (from 50 existing) on weekdays. This is an increase of 16 daily weekend and 9 weekday users as compared to existing conditions.

### ***Preferred Alternative***

The proposed project includes realignment of Redwood Creek Trail and an extension to Dias Ridge Trail. The project has the potential to be a more attractive destination and increase visitor demand, largely due to trail improvements and the completion of a trail loop that will allow for a continuous, off-street 5.4-mile trail experience. A high-growth scenario of a 25% increase in visitation, in addition to the expected annual growth rates, was used to estimate the potential increase in visitor use following project completion. Under a high visitor growth scenario, by 2020 the completion of the proposed action has the potential to add 20 new average daily weekend users and 10 new average daily weekday users to the Redwood Creek Trail in addition to the new users expected under the no action alternative growth rate. Under this scenario, the Dias Ridge Trail has the potential to add 32 new average daily weekend users and 15 new average daily weekday users. It is expected that trail users will overtake or cross paths with more trail users than was the case prior to project implementation.

### ***Traffic and Vehicle Demand***

Travel mode data are not available for visitors arriving to use Redwood Creek Trail and Dias Ridge Trail; therefore, this assessment conservatively assumes that all visitors access the trails by driving. Average vehicle occupancy (AVO) for Dias Ridge Trail and Redwood Creek Trail visitors is assumed to be 2.95 persons during the peak season and 2.65 persons during the off-peak season. This is derived by averaging the AVO from Muir Woods (3.1) and Muir Beach (2.8 during the peak season [April through October] and 2.2 during the off-peak season [November through March]).

Existing daily average vehicle trips were estimated based on existing daily average visitors and assumed AVO, resulting in 24 vehicle trips by Redwood Creek Trail users on the average weekend day and 12 vehicle

trips on the average weekday. Dias Ridge Trail sees an average of 40 daily vehicle trips on weekend days and 18 daily vehicle trips on weekdays.

Twenty-four hour traffic counts were collected at two locations on Muir Woods Road for a week in June 2014. The first location, Upper Muir Woods Road, is just west of the intersection of Muir Woods Road and Panoramic Highway. The second location, Lower Muir Woods Road, is just west of the intersection of Muir Woods Road and Shoreline Highway. Average daily vehicle counts at Upper Muir Woods Road were 2,067 vehicles on weekdays and 2,341 vehicles on weekend days. Average daily vehicle counts at Lower Muir Woods Road were 956 vehicles on weekdays and 1,264 vehicles on weekend days.

Caltrans provides annual average daily traffic (AADT) counts along US-1 at several intersections. Closest to the project, these intersections include:

- US-1 at Muir Woods Road: 3,100 AADT<sup>2</sup>
- US- 1 at South Junction Panoramic Highway: 6,500 AADT

#### *No Action Alternative*

Under the 2020 no action alternative, vehicle trips by Redwood Creek Trail users would grow to 29 average daily weekend vehicles and 15 average daily weekday vehicles. Vehicle trips by Dias Ridge Trail users would grow to 46 average daily weekend vehicles and 21 average daily weekday vehicles.

#### *Preferred Alternative*

Under the 2020 high-growth project scenario vehicle trips by Redwood Creek Trail users could grow to 36 average daily weekend vehicles and 18 average daily weekday vehicles. Vehicle trips by Dias Ridge Trail users could grow to 57 average daily weekend vehicles and 26 average daily weekday vehicles. The proposed project has the potential to add up to 18 average daily weekend vehicle trips and 8 average daily weekday vehicle trips to Muir Woods Road and US-1. The effect would be a less than a 0.1% (one-tenth of 1 percent) increase in traffic over the course of the day at all evaluated locations as compared to existing conditions.

#### ***Parking***

Upon implementation of the reservation system at Muir Woods, it is expected that Muir Woods National Monument parking areas will not be used by visitors using Redwood Creek Trail and Dias Ridge Trail. Parking will be available for trail visitors at other parking areas in the vicinity; specifically, trailheads designated for Dias/Redwood Creek Trail use along Muir Woods Road at State Park trailheads and on Panoramic Highway. Additional parking demand generated by the proposed project would be distributed across these locations. Under the 2020 high-growth scenario, demand would increase by approximately 4% on both weekends and weekdays.

### **M9. Accessibility Accommodations**

There was one comment regarding accessible accommodations for project users: "Sections of, or the entire trail, should be able to be used by wheelchairs; walkers. Some parks have braille signage; others audio information or kiosks. Rustic seating or boulders could be detailed."

---

<sup>2</sup>Values are back AADT, measured south or west of the intersection.  
[http://www.dot.ca.gov/trafficops/census/docs/2014\\_aadt\\_volumes.pdf](http://www.dot.ca.gov/trafficops/census/docs/2014_aadt_volumes.pdf)

## **M9. Response**

The Dias Ridge Trail Extension will be constructed to meet Architectural Barriers Act Accessibility Standard (ABAAS) Section 1017,<sup>3</sup> which defines accessible design for trail construction, including running slope, cross slope, and surface conditions.

Because the Redwood Creek Trail will be open to equestrians, it cannot fully comply with ABAAS.

However, potential barriers will be minimized to the extent possible given the design standards for the type of trail and the limitations of the landscape.

The NPS offers trail information in a variety of formats, including the recently developed NPS Golden Gate app. Trailhead kiosk signs at the Dias Ridge Trail and Redwood Creek Trail are planned to meet standards for accessible sign design and content. These kiosks will detail the average running slope, cross slope, and surfacing material for the trails, so that trail users can understand trail conditions before deciding whether to proceed.

No seating, accessible or otherwise, is proposed on either the Redwood Creek Trail or Dias Ridge Trail. Both the NPS and CDPR minimize installation of seating on their rustic trails due to increased maintenance needed by these features.

## **M10. Electric Vehicles on Trails**

There was one comment that requested electric vehicles and engine assisted vehicles be excluded from the project trails: "Please exclude electric powered vehicles — no electric or engine assisted/powered vehicles."

## **M10.Response**

The following explains the policies of the NPS and the CDPR.

Electric powered mobility assistance devices are allowed on GGNRA roadways and walkways only for the purpose of transporting persons with disabilities as stated in the Superintendent's Compendium<sup>4</sup>. Electric powered mobility assistance devices (e.g. electric scooters, Segway® devices) are motor vehicles as defined in Title 36 CFR. "Electric personal assistive mobility device" or "EPMAD" means a self-balancing, non-tandem two-wheeled device, that is not greater than 20 inches deep and 25 inches wide and can turn in place, designed to transport only one person, with an electric propulsion system averaging less than 750 watts (1 horsepower), the maximum speed of which, when powered solely by a propulsion system on a paved level surface, is no more than 12.5 miles per hour.

It is the policy of the CDPR to permit the use of Other Power-Driven Mobility Devices (OPDMDs) by persons with mobility disabilities. Title II of the ADA<sup>5</sup> defines an OPDMD as any mobility device powered by batteries, fuel, or other engines, whether or not designed primarily for use by individuals with mobility disabilities; that is used by individuals with mobility disabilities for the purpose of locomotion. Unless otherwise authorized in a park unit, the use of OPDMD in California State Parks is restricted to people with mobility disabilities as defined in §35.104 of Title II of the ADA.

---

<sup>3</sup> <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/aba-standards/chapter-10-recreation-facilities>

<sup>4</sup> <https://www.nps.gov/goga/learn/management/upload/2016-Superintendent-s-Compendium.pdf>

<sup>5</sup> <https://www.ada.gov/opdmd.htm>

### **M11. Life Estate**

There was one comment regarding the northern end of the Dias Ridge Trail Extension, as the proposed project passes through a property where the resident has a lifetime (life estate) use of the property. Because of this, the project will end at the life estate property at this time. The recommendation was to extend the trail further than the life estate property by placing the trail within the Caltrans ROW, adjacent to Highway One, as the proposed end of the trail could be unsafe.

The following is a representative comment:

- “The proposal to connect the Dias Ridge Trail Extension to Highway One via the last driveway from NPS residences is unnecessarily dangerous because it directs trail users down the steep NPS driveway that connects at a 90° angle without transition or buffer onto northbound Highway One.”

### **M11. Response**

GGNRA plans to install signage to warn trail users of the abrupt change in direction for the trail where it follows the NPS driveway. The missing length of the trail will be constructed once the life-estate property is available.

### **M12. Impacts to Trees or Loss of Tree Access**

There were five comments regarding impacts to trees and tree canopy. Four comments were concerned with impacts to trees along the Dias Ridge Trail Extension, and one comment was concerned about the potential for loss of tree canopy and shade along the Redwood Creek Trail.

The following are representative comments:

- “I hope the single redwood tree that is near the end of the driveway can be spared when the Cypress trees are cut for the new trail. In a perfect world, only the most dangerous would be taken out, and young intermittent trees would be planted between the elders until grown, and then the elders removed once the young ones took hold. They provide shade on hot days for horses turned in the exercise arena.”
- “I did not go to the project walk, so I have no idea if the new trail alignment will be in a treed area. Shade... is important to hikers.”

### **M12. Response**

The design for the Dias Ridge Trail Extension calls for the removal of trees that have reached the end of their life and are in poor condition, as these trees pose a threat to safety.

In the area immediately adjacent to the existing horse paddock, all existing trees, including the redwood tree, would be removed and replanted, as many are in poor condition. This also will maintain the historic appearance of an even-aged tree windrow and will replace existing trees with a species more appropriate for planting underneath the existing utility lines. These new plantings will serve to create a visual buffer between the trail and the highway, as well as create some shade once trees have established.

The project does not propose planting of new trees followed by later removal and replacement of older trees, as this would be difficult and costly to maintain during the construction of the trail extension. Furthermore, trail construction immediately adjacent to new trees would pose a threat of root damage, whereas planting trees following trail construction allows for better tree establishment.

The new alignment of the Redwood Creek Trail will move the trail under the existing tree canopy. This realignment will increase the amount of tree cover and shade along this portion of the trail as compared to its current location nearer the creek.

### **M13. Compliance Questions**

There were 42 questions regarding the NEPA and CEQA compliance for the trail improvement project. Commenters felt that an EIS/EIR is required for this type of project due to the level of public controversy and environmental impact. Commenters were concerned about the impact to coho salmon habitat. Some commenters requested additional time to review the environmental documents or requested an overview of this project's timeline and how it relates to other projects in the Redwood Creek Watershed.

The following are representative comments:

- This project deserves a full EIS/EIR review to avoid unintended consequences as it now lacks an evaluation as to how it fits into the ecology of Muir Woods and Redwood Creek.
- Given the fact that a range of direct and cumulative adverse impacts have been identified in the EA/IS, and in light of both the environmentally sensitive context in which the project is proposed and inherent controversy over the potential efficacy of identified mitigation strategies, the EA/IS provides insufficient justification for the adoption of a FONSI or simple negative declaration for CEQA purposes.

### **M13. Response**

According to the National Park Service NEPA Handbook <sup>6</sup>, an Environmental Assessment is appropriate for actions which are unlikely to result in significant adverse environmental impacts. The documentation is provided to the Superintendent (decision maker) to make an informed decision and provide the analysis that the project qualifies for an Environmental Assessment.

According to California State CEQA Guidelines<sup>7</sup>, an initial study is conducted by a lead agency (CDPR for this project) to determine if a project may have a significant effect on the environment. If the lead agency determines that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, a Negative Declaration may be prepared.

Because the project occurs in an area of high public interest, the NPS and CDPR held a public walk, hosted several project meetings, and extended the review and comment period for the proposed action.

The Dias Ridge Trail Extension was noted in the 2007 Dias Ridge Restoration and Trail Improvement Project EA/IS (GGNRA and MTSP 2007) and the GGNRA General Management Plan (GMP) (NPS 2014). The GMP states, "The National Park Service would also continue to work with Caltrans to improve the safety of State Route 1 for park visitors, including traffic calming and improved pedestrian crossing, and also to complete the trail connection between Dias Ridge and Redwood Creek trails." (NPS 2015, p126).

The Mount Tamalpais State Park General Plan (CDPR 1979) directs the long-range development and management of the park by providing broad policy and program guidance. The trail improvements identified in the Redwood Creek Trail Realignment portion of the Project are consistent with the unit General Plan and are within the level of land use and development identified in the Frank Valley area of the park. The General Plan states "The Frank Valley area adjacent to Muir Woods was added to the park for the purpose

---

<sup>6</sup> [https://www.nps.gov/orgs/1812/upload/NPS\\_NEPAHandbook\\_Final.pdf](https://www.nps.gov/orgs/1812/upload/NPS_NEPAHandbook_Final.pdf).

<sup>7</sup> [https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I95DAAA70D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I95DAAA70D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default)).

of preserving the area's natural values and to provide additional recreational opportunities." The General Plan also states "Redwood Creek, which runs through Frank Valley, has been identified by the California Coastal Plan as an important resource deserving special protection." (CDPR 1979, p46)

For further discussion of this topic, please see the Specific Response to Comments, Responses S1.3, S1.5, S2.7, S2.11, S2.14, S2.15, S2.16, and S2.18, in the following section.

#### **M14. Public Participation**

There were six comments on the level of public involvement during the development of this project. Commenters expressed concern that there was not adequate transparency during the planning process and public meetings. There were also suggestions to post the public comments for the public to see.

The following are representative comments:

- "NPS did not outreach to concerned stakeholders about the Trails Project before presenting it as an EA/IS released to the public through posting on the NPS website on November 24, 2015, all of two (2) days before Thanksgiving. The one public meeting on the Trails Project and its EA/IS was held on December 3, 2015."
- "Only two dozen public citizens participated in the walk and scoping session. This is insufficient to illicit informed public comment."

#### **M14. Response**

The Dias Ridge Trail Extension was mentioned in several recent planning documents such as the GGNRA GMP (NPS, 2015) and the Dias Ridge Restoration and Trail Improvement Project EA/IS (NPS and CDPR, 2007). The GGNRA hosted several public meetings related to the proposed project. This included a public scoping meeting on March 18, 2015 and a trail walk on March 21, 2015, and a public meeting after the EA/IS release on December 3, 2015.

- 3/18/15 Open House at Mill Valley Community Center
- 3/21/15 Trails Walk
- Mia Monroe provided project briefings at Marin Conservation League, Sierra Club, Muir Beach Advocates, and Muir Beach Community Service District meetings.
- 11/25/15 Release of EA/IS
- 12/3/15 Dias/RWC Trail EA/IS meeting at Mill Valley Community Center
- 11/24/15-1/15/16 Comment Period
- 1/6/16 GGNRA Open House at Tam Valley Community Center

#### **Public Meetings**

Notifications of public meetings were sent via email to individuals and community groups signed up for NPS updates through Constant Contact, and to those who had signed up for previous projects in Marin County. Notice of meetings was posted on NPS, CDPR, Parks Conservancy, and One Tam websites. Flyers were posted at trailhead kiosk bulletin boards at Tennessee Valley and Muir Beach; at Muir Woods Visitor Center; on community bulletin boards at Muir Beach Community Center and Golden Gate Dairy; and flyers were distributed to Green Gulch Farm, Slide Ranch, and Pelican Inn. NPS staff checked flyers and reposted as necessary. Information was also circulated through the One Tam electronic newsletter and on community blogs for Tamalpais Valley and Muir Beach.

### ***EA/IS Release***

Notifications were sent via email through Constant Contact to 1,727 people, and to 174 people who had signed up for previous projects in Marin County, including those who signed up at the meeting in March. A notice was posted on NPS and CDPR websites, a press release was sent to the Marin Independent Journal, a Notice of Intent to Adopt form was posted at trailheads, and flyers were posted at all of the locations noted above. The EA/IS document was available on the NPS Park Planning website. A link to this site was included on the CDPR website, and hard copies were available at the Mt Tam State Park Office, CDPR Bay Area District Headquarters in Petaluma, Muir Woods National Monument Visitor Center, Stinson Beach Library, and Mill Valley Library.

## **Responses to Specific Comments**

This section responds to three letters that included multiple comments. For purposes of responding, these letters are identified as Letter S1, Letter S2, and Letter S3, and individual responses are numbered accordingly (S1.1, S1.2,... S2.1, S2.2, etc.) .

### **Letter S.1**

#### ***Comment S1.1***

**“The EA/IS has been prepared to support a Finding of No Significant Impact (FONSI) under NEPA and adoption of a negative declaration under the California Environmental Quality Act (CEQA). This is despite the fact that EA/IS explicitly acknowledges that trail realignment and extension activities will have direct adverse impacts to vegetation (EA/IS p. 33) and wildlife (EA/IS p. 36), among other things.”**

#### ***Comment S1.1 Response***

Under CEQA and NEPA, removal of vegetation by itself is not considered a significant adverse impact; rather, impacts may be significant if the vegetation removed is listed as a sensitive species or provides habitat for state or federally listed species. This project does neither. The analysis in the EA/IS determined that the proposed project alternative would result in adverse impacts to vegetation, but these would be less than significant and short-term in intensity, and would therefore result in less than significant (Class III) impacts to vegetation (EA/IS p. 33). The analysis in the EA/IS determined that the proposed project alternative would result in negligible short-term impacts during construction and long-term, beneficial impacts to wildlife within the Redwood Creek Watershed and result in beneficial (Class IV) impacts to wildlife (EA/IS p. 37). This comment does not provide any substantive evidence that counters or contradicts the information in the EA/IS.

Excerpts from the EA/IS are provided below.

### ***Section 4.3 Affected Environment and Environmental Consequences*** ***Impact of Alternative B (Proposed Project)***

Under the Action Alternative, trail realignment and trail extension activities would result in direct adverse impacts to vegetation. These impacts are a result of the direct removal of vegetation with chainsaws and hand tools. The realignment would avoid large trees to greatest extent possible. However, smaller trees will need to be removed and a series of downed trees would need to be cut for the trail to pass through the area. Cut material will be left on site. Any limbs that need to be removed from large trees would be cut at the limb collar whenever possible to promote healing and reduce the long-term impacts to the trees. The Dias Ridge Trail Extension would involve removing 13 trees for reasons of safety. These are primarily Monterey cypress (*Cupressus macrocarpa*) and are considered at-risk trees because they are diseased or otherwise in poor condition. In the historic wind row between Highway 1 and the Golden Gate

Dairy, 5 healthy trees would be pruned and retained, and 8 new Monterey cypress trees planted. Impact Reduction Measures (see Section 3.5) implemented as part of the Proposed Project would minimize impacts to vegetation. Where the trail segment is abandoned, the tread would be obliterated and allowed to revegetate. Several best management practices would be employed to avoid the spread of invasive species.

**Cumulative effects.** Under the Proposed Project Alternative, cumulative impacts to vegetation and plant communities are likely to be adverse, but less than significant and short-term, when combined with other past, present, and future projects. However, the impact of vegetation removal for the new Redwood Creek Trail segment and the Dias Ridge Trail Extension would be offset by the restoration and revegetation of the abandoned Redwood Creek Trail segment and the planting of the buffer between the Dias Ridge Trail Extension and Highway 1, including tree planting.

**Conclusions.** Impacts to vegetation would be adverse, but less than significant and short-term in intensity due to the limited extent of the vegetation that would need to be removed to establish the new and realigned trail tread and corridor and the restoration of the abandoned trail segment. Under CEQA, this alternative would result in less than significant (Class III) impacts to vegetation. (EA/IS pp. 33-34)

### ***Wildlife***

#### ***Impact of Alternative B (Proposed Project)***

Under the Proposed Project Alternative, a segment of the Redwood Creek Trail would be realigned and culverts and bridges removed from the Redwood Creek floodplain and drainages to the creek. The existing fords crossing the creek, which have been contributing to the build-up of fine sediment and impacts to aquatic species habitat, would be removed. In addition, the current trail alignment limits projects which could improve creek and floodplain connectivity; the realignment would allow for future projects to reconnect Redwood Creek to its floodplain and enhance habitat in the watershed.

During trail construction activities, there would be adverse, less than significant, short-term impacts due to the localized temporary effects resulting from noise during removal and installation of project features and vegetation clearing. Bare earth may result in erosion and sediment release. If encountered, woodrat nests may be disturbed or removed. Longer-term effects would be associated with the removal of trees and other vegetation to accommodate the new realigned trail segment and from any vegetation removal associated with installation of bridges and other features. This would be offset by the revegetation of the abandoned trail segment in the creek floodplain. The impact reduction measures (see Section 3.5) employed during construction of the trail are intended to protect the immediate area under construction. Reduction of sediment discharge to the creek and moving the trail out of the floodplain would have a beneficial impact on wildlife.

**Cumulative effects.** The proposed trail removal and realignment under the Proposed Project Alternative would contribute a negligible increment to the total past, present and reasonably foreseeable future actions affecting wildlife in the Project area. The Proposed Project would contribute an overall beneficial impact to wildlife in the Project area as a result of habitat enhancements for listed aquatic species.

**Conclusions.** Implementation of the Proposed Project Alternative would result in negligible short-term impacts during construction and long-term, beneficial impacts to wildlife within the Redwood Creek watershed. Under CEQA, this alternative would result in beneficial (Class IV) impacts to wildlife. (EA/IS pp. 36-37)

***Comment S1.2***

**“The proposed adoption of numerous mitigation actions to protect against potential adverse impacts to water quality and listed species (see EA/IS pp. 22-26), reflects an acknowledgment that those impacts are in fact likely and need to be systematically addressed. ”**

***Comment S1.2 Response***

This is precisely the intent of CEQA. According to Section 15002 of the State CEQA Guidelines the basic purposes of CEQA are to identify the ways that environmental damage from implementation of a project can be avoided or significantly reduced and to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible. Similar to CEQA, the federal agency is obligated to examine mitigation measures in their NEPA analysis (40CFR §§ 1502.14(f) to avoid, minimize, rectify, reduce, eliminate, or compensate adverse impacts (40CFR § 1508.20(a)-(e)).

This document identified potential adverse impacts that would result from the project and incorporated avoidance and minimization measures into the project design to minimize these impacts. These avoidance and minimization measure are detailed in the EA/IS section 3.5 Impact Reduction Measures pp. 20-28. This comment does not provide any substantive evidence that counters or contradicts the information in the EA/IS.

An excerpt from the EA/IS is provided below.

“Best management practices (BMPs) would be employed during construction and are integral to the project design. The Project also would comply with all required permits and approvals, such as a SWPPP and a Lake and Streambed Alteration Agreement, if required. The following measures were identified to eliminate or minimize the degree of adverse effects that could otherwise result from project implementation. These measures would be implemented during construction, as appropriate for specific activities being conducted. They are considered part of the proposed Project and, therefore, are not identified as separate mitigation measures.”(EA/IS p. 20)

***Comment S1.3***

**“Given the project's unique environmental context, moreover, any direct or cumulative impacts to the environment should be considered significant and should be fully evaluated within the context of a full environmental impact statement (EIS) under NEPA and full environmental impact report (EIR) under CEQA.”**

***Comment S1.3 Response***

This comment does not provide any substantive evidence, nor cite specific deficiencies in the document that counters, contradicts, or challenges the information in the EA/IS, or otherwise render it inadequate. Direct, indirect, and potential cumulative impacts are addressed in detail in the EA/IS in Section 4.2 Cumulative Impacts and Section 4.3 Affected Environment and Environmental Consequences pg. 32-51.

The Redwood Creek Watershed is a critical resource to NPS and CDPR. Given the species found in the watershed and the unique habitat, the project team has followed the appropriate environmental review process. The project site's unique environment alone does not require an evaluation through an EIS under NEPA or EIR under CEQA. An environmental impact statement must be prepared only when significant environmental impacts will occur as a result of the proposed action. In addition, NPS's NEPA implementing guidance Director's Order 12 (DO-12) states: “An impact's significance is influenced by the importance of

the resource or value being impacted, the geographic location and timing, and other relevant factors that provide context for more fully understanding the severity of the impact.”

***Comment S1. 4***

**“There are grounds for substantial disputes over the nature of the environmental consequences of the project. For example, the EA/IS notes that completion of trail improvements and the trail extension, combined with other trails in the area, will create "increased opportunities for the public to recreate and explore." EA/IS p. 48.”**

***Comment S1.4 Response***

This comment does not provide any substantive evidence, nor cite specific deficiencies in the document that counters, contradicts, or challenges the information in the EA/IS, or otherwise render it inadequate. The potential project impacts are identified and addressed in the following section, EA/IS 4.3 Affected Environment and Environmental Consequences pp. 31-51 (as modified by the Errata).

Excerpts from the EA/IS are provided below.

“While the trail removal and realignment would provide similar recreational opportunities to the existing conditions, the overall quality of the visitor experience would be increased due to improved trail conditions. In addition, the trail extension would address hazardous conditions for pedestrians, bicycles, and equestrians travelling along the narrow shoulder of Highway 1. The trail extension would provide an increase in recreational resources by forming an approximately 5.4-mile continuous trail circuit and would be another step in completing the Bay Area Ridge Trail (EA/IS pp. 47-48).

“The Proposed Action Alternative would contribute a minor increment of new trail experience to the total cumulative past, present and reasonable foreseeable future park operations by adding the Dias Ridge Trail Extension to the trail network. With the completion of trail improvements and the trail extension, combined with the other trails in the area, there would be increased opportunities for the public to recreate and explore the park so the impact would be beneficial (EA/IS p. 48).

"These improvements would create a safer, more sustainable trail with reduced maintenance needs while also benefiting water quality in Redwood Creek, promoting natural drainage, reducing fine sediment delivery to the creek, facilitating coarse sediment delivery, and protecting habitat for listed aquatic species." (EA/IS p. 4)

***Comment S1.5***

**“The potential environmental impacts of the project's facilitation of more intense use of local park lands are highly controversial.”**

***Comment S1.5 Response***

Section 15064(f)(4) of CEQA states that if there is no substantial evidence before the agency that a project may have a significant effect on the environment, the existence of public controversy by itself will not otherwise require the preparation of an EIR. The commenter does not cite elements of the controversy and provides no details of why the project is highly controversial.

For NEPA consideration, the commenter has not provided evidence there is a “substantial dispute as to the size, nature, or effect” to consider this action. Controversial projects do not require additional compliance just because they are controversial in nature. The NPS NEPA Handbook DO-12 states, “While in many cases there will be some disagreement about the nature of the effects of a proposed action, the

mere existence of controversy does not necessarily equate to significance.” Furthermore, the document shows that a very minor increase in park use is anticipated as a result of this project.

A total of 251 comments were received on the Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project, Environmental Assessment/Initial Study, November 2015. Numerous agencies, groups, and individuals provided written support for the project.

## **Letter S2**

### ***Comment S2.1***

**“Most notably, as discussed in greater detail below, it is simply unclear why the relocated Redwood Creek Trail needs to be some 6 feet in width. This is not explained and justified in the EA/IS.”**

### ***Comment S2.1 Response***

The Redwood Creek Trail will follow the CDPR standards for hiking and equestrian trails, which calls for a four foot wide trail with some short five foot wide sections to allow for passing and at turns or grade changes with line of sight concerns. The only part of the Redwood Creek Trail which will be six feet wide is the Santos Meadow Bridge. This is explained under Response M7 “Trail Width” in the Themed Master Response to Comments, and clarified in the Errata.

### ***Comment S2.2***

**“The extension of the Dias Ridge Trail to connect it to Redwood Creek Trail, in contrast, promises no environmental benefits. As far as MTTF can discern, there are none. For that very reason, presumably, the EA/IS does not discuss any such benefits for this part of the Trails Project.”**

### ***Comment S2.2 Response***

The extension of the Dias Ridge Trail will improve the safety of trail users. Under 2.2 Purpose and Need, the purpose of the proposed action is three-fold: “To create a safer and more sustainable trail for visitors; To reduce adverse effects of the Redwood Creek Trail on Redwood Creek and on the multiple drainages to the creek crossed by the trail; and to connect the southern ends of Redwood Creek Trail and Dias Ridge Trail by an extension of the Dias Ridge Trail.”

### ***Comment S2.3***

**“Nor is there any analysis of the anticipated user volume on this greatly expanded trail, and the impact of that user volume on environment, both along the trail (especially the downslope Redwood Creek itself) and in Muir Woods, to which the new trail will convey visitors.”**

### ***Comment S2.3 Response***

The Redwood Creek Trail will not be expanded as part of the project. The Redwood Creek Trail corridor will remain in the same vicinity as the current alignment and the two trailheads on either end of the realigned trail section will remain in their existing locations. The section of the Redwood Creek Trail that will be realigned is bounded on both ends by sections of trail that will remain in their current alignment. There is 0.28 miles of trail at the northern trailhead and approximately 0.70 miles of trail at the southern trailhead that will remain, the portion of the trail that will be realigned is located between these two remaining segments, as such the destinations associated with the trail will not change as part of the project. The project features are identified in Figure 2. Project Features and Locations (EA/IS p. 12).

As indicated in Response S2.1, the Redwood Creek Trail tread width will follow the CDPR standards for equestrian trails, which calls for a four foot wide trail with some short five foot wide sections to allow for

passing and at turns or grade changes with line of sight concerns. The only part of the Redwood Creek Trail which is planned to be six feet wide is the Santos Meadows Bridge. The Redwood Creek Trail will not be extended to Muir Woods as part of the project, the trailheads at each end of the trail will remain in their current locations, see Figure 2.

Please refer to Response M8 “Traffic and Parking Pressure” in the Themed Master Responses to Comments for a discussion of visitation and the anticipated changes resulting from the project.

***Comment S2.4***

**“It is only common sense that a wider trail is going to attract more users; this is especially the case if NPS is planning other projects that will bring more visitors in proximity to the southern end of the Redwood Creek Trail.”**

***Comment S2.4 Response***

The comment is a mischaracterization of the project based on a misunderstanding of the trail design and as a result, overestimates the potential to generate increased use. See the Response M.7 regarding trail width. It is not sufficient to cite “common sense” as substantial evidence for increased use, where the commenter does not provide additional information.

CDPR relies on standards that are compiled in handbooks and reference documents, which follow industry (Parks) standards. Staff are highly trained in the development and maintenance of trails and bring specialty training to their jobs in trail design, usage, and hydrology. The Redwood Creek Trail Realignment has independent utility as a trail improvement project designed to bring the Redwood Creek Trail up to the current CDPR trail standards. The Redwood Creek Trail Realignment does not serve as a catalyst for other NPS or CDPR projects associated with visitor use. The purpose and need for the Redwood Creek Trail Realignment is detailed in the Purpose and Need section of the EA/IS p. 3-4.

The extension to the Dias Ridge Trail will improve safety for trail users who currently walk or ride along the narrow roadside shoulder. NPS follows park guidelines and assesses each location to determine recommendations for a safe width, clearance, and surface material. The cumulative impacts are addressed in the EA/IS, Section 4.2 Cumulative Impacts Affected Environment and Environmental Consequences pg. 32-51 (as modified by the Errata). This section lists projects that are addressed in the cumulative impacts section.

***Comment S2.5***

**“At the very least, the extension of the Dias Ridge Trail to the Redwood Creek Trail will deliver bikes to the start of the Redwood Creek Trail, and there is no physical barrier or other meaningful impediment (such as enforcement assets/measures) to their entering the newly widened trail (even though bikes are formally prohibited on it).”**

***Comment S2.5 Response***

The concern about bike access to the Redwood Creek Trail was addressed in our response to comments during the public scoping process, EA/IS p. 5-6; and in Response M3 “Design Features to Reduce Illegal Bicycle Use on Redwood Creek Trail and Miwok Trail” in the Themed Master Responses to Comments.

**Comment S2.6**

**“The connection of the two trails may also draw more users to one or both, who hope to park near Muir Beach and walk to one of the trailheads on the east side of Highway 1 to begin their trail hikes. This could lead to yet more illegal roadside parking and more traffic congestion, which, along with use of the planned connector trail on the east side of Highway 1, will only exacerbate the safety challenges faced by the first responders at the Muir Beach Fire Station. None of these impacts have been analyzed.”**

**Comment S2.6 Response**

Due to low increases in trail use and associated traffic under a high-growth scenario, staff anticipate a negligible impact to traffic, parking, visitor experience, and safety. Please refer to the Response M8 “Traffic and Parking Pressure” in the Themed Response to Comments section.

An excerpt from the EA/IS is provided below.

“The Proposed Project Alternative would result in negligible short-term and long-term adverse effects to traffic and transportation in the Project area as a result of increased vehicular traffic from construction vehicles and additional trail users after Project completion. There would be no impacts to access to recreational resources as a result of the Proposed Project Alternative. Under CEQA, this alternative would result in less than significant impacts (Class III) to traffic and transportation.” (EA/IS as modified by Errata.)

**Comment S2.7**

**“As explained below, MTTF believes that the Trails Project must be analyzed in an EIS/EIR. While a number of legal deficiencies of the EA/IS are set forth below, most fundamentally, it appears that the Trails Project signals piecemeal implementation of projects that were elements of the NPSs Comprehensive Transportation Management Plan (CTMP) prepared more than a decade ago.”**

**Comment S2.7 Response**

The Redwood Creek Trail Realignment is a project of independent utility and does not serve as a catalyst for nor is a part of the NPS Comprehensive Transportation Management Plan. The Redwood Creek Trail Realignment has independent utility as a trail improvement project designed to bring the Redwood Creek Trail up to the current CDPR trail standards. The Redwood Creek Trail Realignment does not serve as a catalyst for other NPS or CDPR projects associated with visitor use. The purpose and need for the Redwood Creek Trail Realignment is detailed in the Purpose and Need section of the EA/IS p. 3-4.

Connected Action (40 CFR Sec. 1508.25): The Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project is related but not connected to the Muir Woods Reservation System, Muir Woods Sustainable Access Project, Muir Woods Road Improvement Project or any other project being proposed in the Redwood Creek Watershed. The Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project:

- does not trigger another action;
- can proceed independent of other actions occurring;
- is not interdependent on the implementation of any other actions, and;
- does not depend on any other actions for its justification;

The Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project meets the "independent utility" test in that implementing The Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project would take place with or without any other actions planned for the Redwood Creek Watershed.

The Comprehensive Transportation Management Plan (CTMP) was never carried out as a federal decision or a planning document. The General Management Plan (GMP) serves as the guiding approved plan for the park with a programmatic EIS that assessed cumulative impacts of its recommendations. The Dias Ridge Trail Extension was included in the park GMP. The Dias Ridge Trail Extension also has independent utility as shown in the purpose and need, and the cumulative impacts of the project were analyzed.

Please refer to Response M13 “Compliance Questions,” in the Themed Master Responses to Comments.

***Comment S2.8***

**“MTTF remains committed to the spirit of cooperation animating the collaborative process that resulted in the MOU. However, the trust that is a necessary precondition to such cooperation has been broken by the lack of transparency and solicitude for public involvement and input that has characterized the Trails Project and its environmental review process. Given the concerns that compelled MTTF and other community groups to call for the development of the MOU to eliminate parking along Muir Woods Road, it is remarkable that NPS did not outreach to MTTF and other concerned stakeholders about the Trails Project before presenting it as a fait accompli in an EA/IS released to the public through posting on the NPS website on November 24, 2015, all of two (2) days before Thanksgiving. The one public meeting on the Trails Project and its EA/IS was held on December 3, 2015.”**

***Comment S2.8 Response***

Prior to the initiation of this project, the Dias Ridge Trail Extension was mentioned in several park planning processes such as the park GMP and the Dias Ridge Trail EA/IS.

Two events were held as part of public scoping of the Redwood Creek Trail Realignment and Dias Ridge Connector Trail Project (subsequently renamed the Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project). An Open House was held at the Mill Valley Community Center on Wednesday, March 18, 2015 from 6 pm to 8 pm, and a Project Trails Walk was held on Saturday, March 21 from 10 am to 12 pm.” EA/IS p. 5. The EA/IS was released on November 25, 2015 and was open for public comment until January 15, 2016, a total of 52 days, exceeding the required CEQA and NEPA public comment period of 30 days. During the public comment period a publicly noticed meeting was held at the Mill Valley Community Center on December 3, 2015.

Please refer to Response M14 “Public Participation,” in the Themed Master Responses to Comments.

***Comment S2.9***

**“There is an unfortunate recent history of NPS efforts to push through projects that will increase visitation to Muir Woods without the legally required analysis of the impacts of the projects themselves on Redwood Creek and its salmonids, let alone the project impacts on Muir Woods.”**

***Comment S2.9 Response***

This statement is false. The NPS has no intention to increase visitation to Muir Woods. This is evident in the General Management Plan and the Muir Woods Reservation System. The Reservation System EA reduces visitation to address overcrowding and includes action items that reduce illegal roadside shoulder parking. It also includes a reduction in visitation from 1.1 million visitors in 2015 to 928,000 visitors in 2018.

***Comment S2.10***

**The Trails Project will cost \$4 million. It is not a minor or de minimis project.**

***Comment S2.10 Response***

The commenter did not provide context for the use of the term de minimis. The response to this comment is based on the definition of de minimis as “lacking significance or importance: so as to merit disregard.” The land management agencies (NPS and CDPR) are not treating the project as if it were de minimis, evidenced by the fact that an EA/IS was prepared to consider the effects/impacts.

The \$4 million project budget does not correlate to potentially significant impacts and thus the level of environmental review. Much of the cost of the project consists simply of restoring existing trail features that are severely degraded, such as the Culvert Removal 2 and the corresponding Cascade Channel restoration. In most other parks, this work would have qualified for an exemption under CDPR’s CEQA implementation procedures. Other project components such as the free span bridge (Bridge 9) at Santos Meadow and temporary access bridge are designed to minimize impacts to the resources. The purpose of CEQA is to compel government at all levels to make decisions with environmental consequences in mind. This project was conceptualized and designed specifically with environmental consequences in mind.

***Comment S2.11***

**The impact of its implementation on Redwood Creek, its riparian zone, and its salmonids must be properly analyzed.**

***Comment S2.11 Response***

The number one purpose of the project as identified in Section 2.2, “Purpose and Need” is to “reduce or eliminate adverse effects of the Redwood Creek Trail on Redwood Creek, its floodplain, and the multiple drainages to the creek crossed by the trail” (EA/IS p. 3-4). Much of the trail’s current alignment is within the Redwood Creek floodplain, which likely is increasing the amount of fine sediment reaching Redwood Creek. Increased fine sediment loads have a direct adverse effect on the viability of listed species. The fords crossing the creek contribute fine sediment and nutrients to the waterway directly or through runoff, and the presence of horses in the creek in certain seasons has the potential to disturb spawning Coho salmon and steelhead. The Project would create a more environmentally sustainable trail by improving habitat and hydraulic conditions in and around Redwood Creek.

The potential project impacts referenced in the comment above are identified and addressed in the following section, EA/IS 4.3 Affected Environment and Environmental Consequences pp. 31-51 (as modified in the Errata).

In addition to the analysis of impacts in the EA/IS cited above, the land management agencies have engaged the applicable regulatory agencies in the project planning process to ensure that the project design incorporates the appropriate measures to ensure there are not significant adverse impacts to the listed species present in the project area or their habitats. The specific project measures will be further refined during the Section 7 consultations with the National Marine Fisheries Service (NMFS) and the US Fish and Wildlife Service (USFWS). Project site visits were conducted with NMFS on March 7, 2016 and the USFWS on April 13, 2016. In addition to the 2014 site visit referenced below, we initiated an additional project site visit with California Department of Fish and Wildlife fisheries staff on May 4, 2016.

This comment does not provide any substantive evidence, nor cite specific deficiencies in the document that counter, contradict, or challenge the information in the EA/IS, or otherwise render it inadequate.

An excerpt from the EA/IS is provided below.

“During project planning, the CDPR and NPS have been coordinating with the Regional Water Quality Control Board (RWQCB), the California Department of Fish and Wildlife (CDFW), and the U.S. Army Corps

of Engineers (USACE). An agency site visit occurred in 2014, and conceptual designs for bridges, Culvert Removal 2/cascade channel, and crib wall and culvert removals were reviewed by the agencies. In addition, the CDPR would be applying to the USACE for a permit under Section 404 of the Clean Water Act (CWA), to the State Water Resources Control Board for a Water Quality Certification under CWA Section 401, and to CDFW for a Lake and Streambed Alteration Agreement under the California Fish and Game Code, Section 1602. During coordination with USACE, coordination also will occur with the National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (USFWS) regarding special-status species” (EA/IS p. 5).

***Comment S2.12***

**“The Projects long-term impacts, including that from the increased use that will be accommodated by its 6-foot width, both on the area around it (including the downslope Redwood Creek) and on Muir Woods itself, to which the new trail leads, must be properly analyzed.”**

***Comment S2.12 Response***

This comment mischaracterizes the trail width as proposed and as a result, overestimates its potential to generate increased use. As indicated in Response S2.1 the Redwood Creek Trail tread width will follow the CDPR standards for equestrian trails, which call for a four foot wide trail with some short five foot wide sections to allow for passing and at turns or grade changes with line of sight concerns. The only part of the Redwood Creek Trail which will be six feet wide is the Santos Meadow Bridge. The Redwood Creek Trail will not be extended to Muir Woods as part of the project, the trailheads at each end of the trail will remain in their current locations, see Figure 2. Project Features and Locations (EA/IS p. 12). The misunderstanding regarding trail width appears to have influenced many of the opinions of the commenter. The comment does not explain what the proper analysis would be or what is improper about the analysis in the environmental document.

***Comment S2.13***

**“And these impacts can only be meaningfully reviewed if they are analyzed along with other projects NPS has in store for Muir Beach, Muir Woods Road, Muir Woods itself, and the lands surrounding them, especially those projects that may impact Redwood Creek and/or increase visitation to Muir Woods.”**

***Comment S2.13 Response***

As stated previously, the Redwood Creek Trail project has independent utility as a trail improvement project designed to bring the Redwood Creek Trail up to the current CDPR trail standards. The Redwood Creek Trail Realignment does not serve as a catalyst for other NPS or CDPR projects associated with visitation, nor is the project dependent on those potential future projects to become operational. The purpose and need for the Redwood Creek Trail Realignment is detailed in the Purpose and Need section of the EA/IS p. 3-4.

Similarly, the Dias Extension Trail has independent utility and purpose and need that is detailed in the Purpose and Need section of the EA/IS p. 3-4 and in the Response S2.6. Cumulative impacts are discussed for each affected environment and environmental consequence. The project was included in the General Management Plan and the Dias Ridge Trail as a future project. Cumulative impacts are also addressed in Responses M13, S1.1, S1.3, S2.4, S2.7, S2.19, S2.20, and S2.10.

Subsequent to publication of the Redwood Creek and Dias Ridge Connector Trail Draft EA, the cumulative impact analysis for the Muir Woods National Monument Sustainable Access Project Final EA was published (May 2017) and is included here by reference.

***Comment S2.14***

MTTF recognizes that NPS and CDPR extended the public comment period on the EA/IS from January 8, 2015, to January 15, 2015. However, this was necessary in light of the very limited scoping and opportunity for public comment that has been provided to date on a substantial and controversial project, as explained above. The lack of opportunity for public input and involvement in the development and environmental review of the Trail Project is regretful, as it may have led NPS and CDPR to recognize the deficiencies discussed below and, instead, provide a robust public comment process and prepare and EIS/EIR.

***Comment S2.14 Response***

The NPS and CDPR exceeded the requirements of both agencies for public outreach and comment periods. As stated in Response S2.8 above “Two events were held as part of public scoping of the Redwood Creek Trail Realignment and Dias Ridge Connector Trail Project (subsequently renamed the Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project). An Open House was held at the Mill Valley Community Center on Wednesday, March 18, 2015 from 6 pm to 8 pm, and a Project Trails Walk was held on Saturday, March 21 from 10 am to 12 pm.” EA/IS p. 5. The EA/IS was released on November 25, 2015 and was open for public comment until January 15, 2016, a total of 52 days, exceeding the required CEQA public comment period of 30 days. During the public comment period a publicly noticed meeting was held at the Mill Valley Community Center on December 3, 2015.

***Comment S2.15***

**“At the threshold, the EA/IS does not contain enough information and analysis to satisfy NEPAs and CEQAs requirements for, respectively, Environmental Assessments and Negative Declarations, even if the project did not require (as it does) an EIS and an EIR. But MTTF will not impose on the lead agencies and other interested parties with the minutiae of how the EA/IS falls short relative to the legal requirements for an EA and an IS. The bottom line is that even a technically correct and comprehensive EA/IS would be unlawful under both NEPA and CEQA because an EIS/EIR is required. The project requires an EIS/EIR for several reasons.”**

***Comment S2.15 Response***

This comment does not provide any substantive evidence that counters or contradicts the information in the EA/IS and does not provide specific details on the additional information they would like to see considered as part of the environmental compliance process. Responses to the commenter’s specific reasons why an EIS/EIR are required are addressed individually above and below.

***Comment S2.16***

The project appears to be but one of many projects the NPS is planning to facilitate increased visitation to Muir Woods, and so is not properly evaluated separate from those other projects. To the extent CDPR is planning itself, or with NPS, other projects that will facilitate increased visitation to Muir Woods, it, too, under CEQA, must consider those projects together with the Trail Project. The separate, serial environmental review apparently contemplated for a suite of projects to increase visitation to Muir Woods is unlawful piecemealing or segmentation, unlawful under both NEPA and CEQA.

***Comment S2.16 Response***

The Redwood Creek Trail Realignment project is not planned to facilitate increased visitation to Muir Woods. The project was designed to bring the Redwood Creek Trail up to the current CDPR trail standards to improve water quality in Redwood Creek, promote natural drainage, reduce fine sediment delivery to

the creek, facilitate coarse sediment delivery, and enhance habitat for listed aquatic species. The Redwood Creek Trail Realignment does not serve as a catalyst for other NPS or CDPR projects associated with visitor use. The purpose and need for the Redwood Creek Trail Realignment is detailed in the Purpose and Need section of the EA/IS p. 3-4.

An excerpt from the EA/IS is provided below.

“These improvements would create a safer, more sustainable trail with reduced maintenance needs while also benefiting water quality in Redwood Creek, promoting natural drainage, reducing fine sediment delivery to the creek, facilitating coarse sediment delivery, and protecting habitat for listed aquatic species. In addition, past actions have disrupted the connectivity of the creek and its floodplain; moving the trail out of the floodplain would allow for future projects to reconnect Redwood Creek to its floodplain. This would further improve hydrologic and geomorphic functions in the watershed.” (EA/IS p. 3-4)

NPS has no plans to increase visitation to Muir Woods. The Muir Woods Reservation System EA aims specifically to reduce the overall visitation to Muir Woods in the future. The Dias Ridge Trail Extension will provide a safer experience to all users who currently walk or ride along the road shoulder for the 1300 foot gap between existing trails. The extension would connect the Dias Ridge Trail at Golden Gate Dairy to the Redwood Creek Trail at Muir Woods Road, eliminating the need to use the highway shoulder. The Dias Ridge Trail Extension would enhance safety and complete the 5.4-mile Redwood Creek-Miwok-Dias Ridge trail loop. This project is Phase 2 of a three phase project to improve trail connectivity for the Dias Ridge Trail, and this extension is an important step towards Phase 3. These projects are included in the 2014 GGNRA General Management Plan.

Please refer to Response M. 8 “Traffic and Parking Pressure” in the Themed Master Responses to Comments.

#### ***Comment S2.17***

**With regard to the Trails Project, NPS and CDPR have failed to analyze the environmental impacts of increased use of Redwood Creek Trail and Muir Woods, to which that Trail leads, resulting from connecting the Dias Ridge Trail to the Redwood Creek Trail, and from relocating, improving, and significantly widening the Redwood Creek Trail.**

#### ***Comment S2.17 Response***

The comment mischaracterizes the extent of work occurring on the Redwood Creek Trail. Significant widening of the trail will not occur; it will be improved back to its original prism following CDPR standards for equestrian trails to maximize user safety. The standards call for a four foot wide trail with some five foot wide sections to allow for passing and at turns or grade changes with line of sight concerns. The only portion of the Trail that will be six feet wide is the Santos Meadow Bridge. Additionally, a portion of the trail will be realigned to enhance the trail’s sustainability. Finally, the Redwood Creek Trail will not be extended to Muir Woods as part of the project, the trailheads at each end of the trail will remain in their current locations, see Figure 2. Project Features and Locations (EA/IS p. 12). As such, there is no basis to assert that the realignment and rehabilitation project will generate increased use.

As stated previously, the Redwood Creek Trail project has independent utility as a trail improvement project designed to bring the Redwood Creek Trail up to current CDPR trail standards. The Redwood Creek Trail Realignment does not serve as a catalyst for other NPS or CDPR projects associated with visitation. The purpose and need for the Redwood Creek Trail Realignment is detailed in the Purpose and Need section of the EA/IS p. 3-4.

The Dias Ridge Trail Extension completes a missing section of trail in a network that is frequently used by visitors. Visitors currently walk or ride along the roadside shoulder, which is narrow and unsafe. The Extension Trail will provide a safer alternative to the shoulder.

This comment does not provide any substantive evidence nor cite specific deficiencies in the document that counter, contradict, or challenge the information in the EA/IS, or otherwise render it inadequate.

***Comment S2.18***

**“There is substantial evidence that the Trails Project may have significant environmental impacts; the extent of those impacts is the subject of serious controversy.”**

***Comment S2.18 Response***

Section 15064(f)(5) of CEQA states that argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, shall not constitute substantial evidence. Substantial evidence must include facts, reasonable assumptions predicated upon facts and expert opinion supported by facts. With respect to the “serious controversy” a total of 251 comments were received on the Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project, Environmental Assessment/Initial Study, November 2015. The majority of comments, 73% of the 251 comments, were supportive of the project and numerous agencies, groups, and individuals provided written support for the project. Section 15064(f)(4) of CEQA is very clear that if there is no substantial evidence before the agency that a project may have a significant effect on the environment, the existence of public controversy by itself will not otherwise require the preparation of an EIR. As the commenter provided no substantive evidence for the “substantial evidence” that counters or contradicts the information in the EA/IS, no changes to the document are required.

Similar to CEQA, NEPA does not require an EIS if there is controversy about the project. Director’s Order 12 states, “While in many cases there will be some disagreement about the nature of the effects of a proposed action, the mere existence of controversy does not necessarily equate to significance. However, substantial dispute (e.g. “substantial dispute as to the size, nature, or effect”) within the scientific community about the effects of a proposed action would indicate that the effects are likely to be highly controversial and therefore likely significant.” The commenter has not presented any evidence of dispute within the scientific community.

The land management agencies developed the project utilizing the expertise of its internal staff in conjunction with the experts of outside agencies charged with ensuring the protection of their respective resource areas. Throughout the project planning process, the land management agencies have been coordinating with the Regional Water Quality Control Board (RWQCB), the California Department of Fish and Wildlife (CDFW), and the U.S. Army Corps of Engineers (USACE) to ensure that the project design incorporates the appropriate measures to ensure there are not significant adverse impacts to the listed species present in the project area or their habitats. An agency site visit occurred in 2014, and conceptual designs for bridges, culvert removals/cascade channel, and crib wall were reviewed by the agencies. In addition, CDPR would be applying to the USACE for a permit under Section 404 of the Clean Water Act (CWA), to the State Water Resources Control Board for a Water Quality Certification under CWA Section 401, and to CDFW for a Lake and Streambed Alteration Agreement under the California Fish and Game Code, Section 1602. Permitting with USACE will require coordination with the National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (USFWS) regarding special-status species (EA/IS p. 5) and specific project measures to protect listed species will be further refined during this process. Initial project site visits were conducted with NMFS on March 7, 2016 and the USFWS on April 13, 2016.

### **Comment S2.19**

**"For example, the EA/IS notes that completion of Redwood Creek Trail improvements and the Dias Ridge Trail extension, combined with other trails in the area, will create increased opportunities for the public to recreate and explore. EA/IS p. 48. The EA/IS concludes summarily that the impact on the visitor experience would be beneficial; however, impacts that an agency believes are beneficial may still have adverse environmental impacts warranting the preparation of an EIS/EIR."**

#### ***Comment S2.19 Response***

The potential project impacts are identified and addressed in the following section, EA/IS 4.3 Affected Environment and Environmental Consequences pp. 31-51 (as modified in the Errata). This comment does not provide any substantive evidence nor cite specific deficiencies in the document that counter, contradict, or challenge the information in the EA/IS, or otherwise render it inadequate. Cumulative impacts are also addressed in Responses M13, S1.1, S1.3, S2.4, S2.7, 2.13, S2.20, and S2.10.

Excerpts from the EA/IS are provided below.

"While the trail removal and realignment would provide similar recreational opportunities to the existing conditions, the overall quality of the visitor experience would be increased due to improved trail conditions. In addition, the trail extension would address hazardous conditions for pedestrians, bicycles, and equestrians travelling along the narrow shoulder of Highway 1. The trail extension would provide an increase in recreational resources by forming an approximately 5.4-mile continuous trail circuit and would be another step in completing the Bay Area Ridge Trail (EA/IS pp. 47-48).

"The Proposed Action Alternative would contribute a minor increment of new trail experience to the total cumulative past, present and reasonable foreseeable future park operations by adding the Dias Ridge Trail Extension to the trail network. With the completion of trail improvements and the trail extension, combined with the other trails in the area, there would be increased opportunities for the public to recreate and explore the park so the impact would be beneficial (EA/IS p. 48).

"These improvements would create a safer, more sustainable trail with reduced maintenance needs while also benefiting water quality in Redwood Creek, promoting natural drainage, reducing fine sediment delivery to the creek, facilitating coarse sediment delivery, and protecting habitat for listed aquatic species." (EA/IS p. 4)

### **Comment S2.20**

**"There is substantial uncertainty over whether proposed management actions will effectively mitigate those impacts in the long term. That is particularly true when those impacts are considered together with the cumulative impacts of other actions that NPS and CDPR may take."**

#### ***Comment S2.20 Response***

The land management agencies have not made any claims of uncertainty regarding environmental effects, nor has the commenter provided any evidence that the effects are uncertain. This comment does not provide any substantive evidence for whether the proposed management actions will effectively mitigate impacts in the long term, nor does it cite specific deficiencies in the proposed management actions that counter, contradict, or challenge the information in the EA/IS, or otherwise render it inadequate.

Potential cumulative impacts are addressed in detail in the EA/IS section 4.2 Cumulative Impacts Affected Environment and Environmental Consequences pg. 32-51 (as modified in the Errata). As stated previously the Redwood Creek Trail project has independent utility as a trail improvement project designed to bring the Redwood Creek Trail up to current CDPR trail standards. The Redwood Creek Trail Realignment does

not serve as a catalyst for other NPS or CDPR projects associated with visitation. The purpose and need for the Redwood Creek Trail Realignment is detailed in the Purpose and Need section of the EA/IS p. 3-4.

***Comment S2.21***

**“Other significance criteria compelling a determination that the Trails Project will have significant impacts include: the unique characteristics of the geographic area — national and California park lands containing ecologically critical habitat for listed salmonids (1508.27(b)(3)); cumulatively significant impacts of related actions (1508.27(b)(7)); and potential impacts endangered salmonids and their habitat (1508.27(b)(9)).”**

***Comment S2.21 Response***

The potential impacts of the project are identified and addressed in the EA/IS section 4.3 Affected Environment and Environmental Consequence, pp. 31-51 (as modified in the Errata). This comment does not provide any substantive evidence that counters or contradicts the information in the EA/IS. The EA/IS identifies the benefits to salmonids from the project. The EA/IS also includes project design elements, such as seasonal timing of activities, to ensure there are not significant impacts to salmonids in the EA/IS Scheduling section and Impact Reduction section.

Excerpts from the EA/IS are provided below.

“Several areas along the current Redwood Creek Trail contribute fine sediment to Redwood Creek. Increased fine sediment loads have a direct adverse effect on the viability of aquatic species, including listed special-status species. Equestrians using the trail must cross the creek via fords in 3 locations. The fords contribute fine sediment and nutrients to the waterway directly or through runoff, and the presence of horses in the creek in certain seasons has the potential to disturb spawning coho salmon and steelhead.” (EA/IS p. 4)

“In particular, the construction season is limited by seasonal biological activity: northern spotted owl nesting; landbird nesting; California red-legged frog mating; bat maternity season; and salmonid spawning. Construction would be outside of mating and spawning seasons to the extent possible.” (EA/IS p. 18).

“Construction would not occur in or near the creek during migration and spawning seasons of protected species, including coho salmon and steelhead. No in-water construction activities or creek dewatering would occur prior to July. Prior to working in wetted channels, channels would be dewatered. Prior to dewatering, native fish, tadpoles, and other vertebrates would be excluded or removed and relocated outside of the project area by a qualified biologist. Fish would be netted or chased from each individual area where in-channel work would occur. Electrofishing would be used to capture any remaining individuals. Captured fish would be placed in aerated holding containers and transferred to pool habitats outside of the project area. A qualified biologist shall monitor the construction site during placement and removal of channel diversions and coffer dams to ensure any effects to ESA-listed salmonids are minimized. All materials placed for creation of coffer dams would be removed upon completion of activities.” (EA/IS p. 25)

Please refer to Response S2.11 for further details on the purpose and need of the project with regard to salmonids.

## Letter S3

### *Comment S3.1*

Proper public notification was not received for a legitimate comment period and the requisite 30 days should begin starting January 11, 2016. Please see our explanation below. During the holiday season, 2015, you issued an Environmental Assessment/Initial Study (EA) reflecting your findings and analysis of the trail, a realignment of it, and the construction of a multi-use trail/road to extend the Dias Ridge multi-purpose trail for all users. Apparently the NPS left to the state the noticing of this EA, and under CEQA Guidelines, if the clearinghouse is used, the time for replies from the public is at least 30 days. However, the notice to the public that the interested agencies were in fact sent the EA was not posted until Jan. 11, 2016, thereby depriving the public of the right to know that reviewing agencies, such as Fish and Wildlife, the Water Board and others upon which we rely for their expertise and oversight, were in fact sent the EA and had the opportunity to review it. This deficiency in notice, which is a requisite for the legal efficacy of the EA, should automatically extend the time within which the public can respond, to at least Feb. 11, 2015.

### **Comment S3.1 Response**

The EA/IS was recorded as being received at the State Clearinghouse on November 25, 2015, as noted on the CEQAnet website (<http://www.ceqanet.ca.gov/ProjDocList.asp?ProjectPK=642705>), and assigned SCH No. 2015112053. In reference to public notice period, please refer to Response S2.7. In regards to noticing the “public that interested agencies were in fact sent the EA,” per Section 15073(d) of the State CEQA Guidelines, the primary purpose of providing copies of a Negative Declaration to the State Clearinghouse is for distribution to State Agencies for review. Section 15072(g) of the CEQA identifies what information must be included in the Notice of Intent to adopt a Negative Declaration:

- (1) A brief description of the proposed project and its location.
- (2) The starting and ending dates for the review period during which the lead agency will receive comments on the proposed negative declaration or mitigated negative declaration. This shall include starting and ending dates for the review period. If the review period has been shortened pursuant to Section 15105, the notice shall include a statement to that effect.
- (3) The date, time, and place of any scheduled public meetings or hearings to be held by the lead agency on the proposed project, when known to the lead agency at the time of notice.
- (4) The address or addresses where copies of the proposed negative declaration or mitigated negative declaration including the revisions developed under Section 15070(b) and all documents referenced in the proposed negative declaration or mitigated negative declaration are available for review. This location or locations shall be readily accessible to the public during the lead agency’s normal working hours.
- (5) The presence of the site on any of the lists enumerated under Section 65962.5 of the Government Code including, but not limited to lists of hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section.
- (6) Other information specifically required by statute or regulation for a particular project or type of project.

The list of public agencies reviewing the document is not a required component of the Notice of Intent to adopt a Negative Declaration. The State Clearinghouse sent the Negative Declaration to the following state agencies for review:

- Resources Agency
- Department of Boating and Waterways
- Department of Fish and Wildlife, Region 3
- Department of Parks and Recreation
- Department of Water Resources
- California Department of Transportation (Caltrans), District 4
- Air Resources Board
- State Water Resources Control Board, Division of Water Quality
- Regional Water Quality Control Board, Region 2
- Native American Heritage Commission

The California Coastal Commission and Caltrans submitted comments.

***Comment S3.2***

**The details of how the trail extension will be constructed are not found. This is a major deficiency in that California Law defines mountain biking as a hazardous recreational activity, see Govt. Code, sec. 831.7(b), which excludes government liability for participation in hazardous recreational activities if the injured is either a participant or a person voluntarily there.**

***Comment S3.2 Response***

The Dias Ridge Extension Trail would be located on federal property; the comment references the California government code. The Dias Ridge Extension Trail is described and mapped in Alternative B – Proposed Action/Preferred Alternative, page 11 of the EA/IS. The NPS will follow the park's trail guidelines and standards to construct this section of multi-use trail. Multi-use trails are located throughout the Golden Gate National Recreation Area and the other units in the National Park Service. Trails are designated as multi-use if they have reasonable width, sightlines, and grades in order to be considered safe for all users. As stated in 36 CFR part 4, "The National Park Service (NPS) believes that, with proper management, bicycling is an appropriate recreational activity in many park areas." As the trail does not result in a significant impact on the environment, the multi-use trail is an appropriate trail designation in this location.

***Comment S3.3***

**Section 831.7(d) and (f) provides this however: Injury proximately caused by the negligent failure of the public entity...to properly construct or maintain in good repair...or substantial work of improvement utilized in the hazardous recreational activity out of which the damage or injury arose does not limit liability .... Moreover, protection of children is paramount: Sec. 831.8, (e) and (f): Nothing exonerates a public entity from liability [as stated] in the case of injury to children under the age of 12 [part (i)] and 16 [part (f)] from a "dangerous condition of property"... We assume that you are attempting to follow California law. Widening the proposed trail is not enough. We also assume that both of the Lead Agencies have regulations, rules, or protocols addressing the construction of mountain biking trails such that children on foot, as well as children on bikes, have the protection contemplated under the statute for their protection.**

***Comment S3.3 Response***

Please refer to Response S2.1 for details on the trail width in Responses to Specific Comments and Responses M2 “Bike Calming Design Features on Dias Ridge Trail Extension” and M3 “Design Features to Reduce Illegal Bicycle Use on Redwood Creek Trail and Miwok Trail” in the Themed Master Responses.

***Comment S3.4***

**We are not satisfied with any of the proposals due to lack of a capacity study as well as the division of projects that are currently being considered. We think that this EA is premature in not considering the current number of projects outstanding. Before consideration of any new construction or changes are considered, the implementation of the parking reservation system, loss of parking and barrier restrictions should occur first, followed by analysis of the resulting fall-out and changes on the watershed including changes in traffic, hiking and biking entry and use patterns. It is inevitable that more and more hikers and bikers will use these methods to access Muir Woods National Monument given the new restrictions on parking.**

***Comment S3. 4 Response***

Please refer to Responses M8, S2.2, S2.3, S2.6, S2.7, and S2.16.

***Comment S3.5***

**The signs do nothing to deter either dogs or mountain bikes on the Redwood Creek trail and are a failure. As expressed at public meetings, a trail that connects a bike path to the Redwood Creek trail will invite more "poaching" by mountain bikers of the trail that runs through critical habitat of special status species.**

***Comment S3. 5 Response***

Similar to CDPR, NPS manages a network of trails with various permitted uses. Visitors are accustomed to following maps and trail signs, which display permitted uses. Regulations on the trail are communicated through a combination of Trail signs, law enforcement, and other trail users to help to enforce the regulations.

Please refer to Response M3 “Design Features to Reduce Illegal Bicycle Use on Redwood Creek Trail and Miwok Trail” in the Themed Master Responses.

***Comment S3.6***

**Moving the trail to a higher location and out of the flood plain for environmental reasons brings with it the threat of easier access for pedestrians looking to get into Muir Woods from Muir Beach as well as mountain bikers who will find illegal riding, and night access to protected public lands, much easier. This illegal mountain bike usage is already a serious problem in Marin's open space areas. This proposed Redwood Creek trail project combined with the Dias Ridge trail extension creates a veritable freeway for mountain bikers and hikers.**

***Comment S3.6 Response***

The commenter does not explain how moving a segment of the trail out of the floodplain would create easier access. The Redwood Creek Trail and Dias Ridge Extension will be an unpaved, narrow, circuitous trail experience that follows the natural topography of the site. NPS and CDPR staff will continue to monitor unsafe conditions on all trails within the park.

Please refer to Responses S2.2, S2.3 and S2.17.

***Comment S3.7***

**Increased usage of the trail as an access to Muir Woods from Muir Beach will place excess stressors on an already fragile ecosystem. It has the potential to undermine needed environmental and fish recovery and the expensive and extensive restoration efforts by multiple organizations.**

***Comment S3.7 Response***

This comment does not provide any substantive evidence on how the project has the potential to “undermine needed environmental and fish recovery and the expensive and extensive restoration efforts by multiple organizations,” nor does it cite specific deficiencies in the proposed management actions that counter, contradict, or challenges the information in the EA/IS, or otherwise render it inadequate.

Please refer to Responses S2.2, S2.3 and S2.17 and M8 “Traffic and Parking Pressure” in the Themed Master Responses to Comments.

***Comment S3.8***

**In addition, it has the potential to create excessive traffic, unwanted parking within private neighborhoods depriving local citizens of their peace, and exacerbating safety concerns and impacts for residents and visitors. Increased traffic will become commonplace with the resultant broadcasting of toxins from vehicles and road use into runoff into the creek. The EA/IS fails to consider traffic as an environmental impact, as CEQA requires. This failure alone shows that the EA/IS is fatally flawed under the law.**

***Comment S3.8 Response***

The potential project impacts are identified and addressed in the following section, EA/IS 4.3 Affected Environment and Environmental Consequences pp. 31-51 (as modified in the Errata). Traffic impacts are specifically addressed on pp. 48-49 with additional information provided in the Errata section of this document.

Please refer to Responses S2.2 and S2.3 in the Responses to Specific Comments and to Response M8 “Traffic and Parking Pressure” in the Themed Master Responses to Comments.

***Comment S3.9***

**As stated, we object strenuously to the creation of a multiple use trail approaching the Redwood Creek Trail. The EA/IS does not even begin to address how a multi-use trail will meet any standards that will satisfy the liability imposed by California law for hazardous recreational use. For example, the 600 page EIR for Bill's Trail in Samuel Taylor Park deals extensively with the hazards of constructing such a trail in an area where creeks flow into Lagunitas Creek. For Redwood Creek, there is nothing. Hazards to the fish are obvious; hazards to children either on foot or on bikes are equally obvious.**

***Comment S3.9 Response***

The Redwood Creek Trail Realignment Project is not a Change in Use project and CDPR is not considering changing the use designation for the Redwood Creek Trail to include bikes. The commenter is correct that the Bill's Trail Change in Use project was evaluated in an Environmental Impacts Report (EIR). That document was prepared specifically due to the potential impacts associated with the project as a Change in Use project (Final Environmental Impact Report, Trail Change in Use and Improvement Project, Samuel P. Taylor State Park, 2012). Subsequent to the preparation of the Bill's Trail CEQA document CDPR prepared a Program Environmental Impact Report for the Road and Trail Change-in-Use Evaluation Process 2013. All proposed Change in Use projects follow the process outlined in that document. That process is not

appropriate for the Redwood Creek Trail Realignment project because the project does not include changing the current use of the trail.

Please refer to Response S2.12 in Responses to Specific Comments and Response M3 “Design Features to Reduce Illegal Bicycle Use on Redwood Creek Trail and Miwok Trail” in the Themed Master Responses to Comments.

***Comment S3.10***

**We strongly object to the "segmentation" and piece-meal project approach that this EA/IS represents when there are multiple projects planned. These should all fall under a singular project of the Redwood Creek watershed "enhancements." Review of all of the project proposals should be occurring simultaneously since the projects will influence the outcomes and environmental impacts from one project to another. The trail expansion, extensions and relocation, have the potential to create direct and indirect cumulative adverse impacts and therefore we recommend a full EIS/EIR should be implemented. Page 32 of the EA/IS briefly deals with 'cumulative impacts.' While listing some 'examples' of planned projects, the MOU and road repairs are missing. Since the issues presented by these parts of the overall environmental impact have been of paramount concern, the resolutions sought through these endeavors are decidedly part of the cumulative effects of any environmental assessment of the Project.**

***Comment S3.10 Response***

The General Management Plan for the Golden Gate National Recreation Area lays out the park’s vision for coming decades. The GMP was done with a programmatic EIS that supports this document. The EIS analyzes cumulative projects throughout the park. The Redwood Creek and Dias Trails projects have independent utility and distinct purpose and need.

The categorization of the Muir Woods Road MOU and Federal Highways projects as being part of the Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project appears to be based on a misunderstanding of the project scope.

Subsequent to publication of the Redwood Creek and Dias Ridge Connector Trail Draft EA, the cumulative impact analysis for the Muir Woods National Monument Sustainable Access Project Final EA was published (May 2017) and is included here by reference.

Please refer to Responses S1.3 and S2.7.

***Comment S3.11***

The implications of the January 6th NPS confirmation for plans for a 7 day a week all year round shuttle from Sausalito has not been dealt with and ties into this project as a potential feeder project: i.e. the plans for ferries DIRECT from their Alcatraz dock in SF, in addition to increased SF to Sausalito regular ferries. The implication is that there could be an additional 750 people per hour getting off the ferry and on to buses to Muir Woods. Any increase in vehicles within the watershed, whether buses or cars, will cause a continued degradation of habitat, increased pollution from roads and degraded water and air quality, to say nothing of increased traffic throughout the already overly congested area. The Muir Woods route will continue to have an ever increasing number of shuttles and buses and continue to exacerbate the stressors on the ecosystem, regardless of the parking reservation system, which only addresses parking for individual automobiles. The number of visitors to Muir Woods and the area has not been reduced to correct the dire circumstance of the known extirpation cycle of once prolific species such as coho salmon, western pond turtle, northern spotted owls, four species of bats, steelhead trout, red-legged frogs, etc. In fact, the project favors increasing and facilitating visitors over habitat and species protections while masquerading as an environmental protection project. Any environmental review must place the natural habitat of special species first, and the money tree which this area provides, a distant second.

***Comment S3.11 Response***

The park does not have plans to have daily service from Sausalito. The Muir Woods Reservation System Environmental Assessment identifies future Muir Woods shuttle schedules and frequencies. The expansions to existing service in the Reservation EA are limited to creating a more consistent and intuitive schedule by having year round weekend shuttle service. NPS has no intention to increase visitation to Muir Woods, in fact the Reservation system will reduce annual and peak season visitation.

Please refer to Responses S2.2, S2.3, S2.6, S2.16 and S2.17.

***Comment S3.12***

Many organizations, including Watershed Alliance of Marin have asked repeatedly for a capacity study for Muir Woods to no avail. As stated, this presents a fatal flaw in any purported environmental "analysis". Other stressors not cited in the EA/IS include the NPS-desired bus depot at the Pelican Inn (40 concrete piers extending into the area between Green Gulch salmon stream and Redwood Creek) that would gravely impact this area. Any projections and attempts to "develop" this area must be taken into account as part of the impact on the watershed and part of a full project analysis.

***Comment S3.12 Response***

The 2015 General Management Plan addresses user capacity in Chapter 7 for the Golden Gate National Recreation Area. This chapter, User Capacity, addresses resource and social indicators in order to manage use levels in the park at Alcatraz and Muir Woods. The implementation of the Muir Woods Reservation System will enable the park to regulate visitation by reducing visitation numbers during the highest peak visitation times. The bus stop project is no longer an active or proposed park project.

***Comment S3.13***

This EA does not represent existing circumstances nor the various multiple proposals of development. The realignment of the Redwood Trail, without additional projects in mind, would be a positive step, but the unintended consequences are not.

***Comment S3.13 Response***

This comment does not provide any substantive evidence to demonstrate how the project “does not represent existing circumstances,” does not provide details regarding “various multiple proposals of development,” and does not identify any “unintended consequences” associated with the project. The comment does not cite specific deficiencies in the document that counter, contradict, or challenge the information in the EA/IS, or otherwise render it inadequate.

***Comment S3.14***

**We recommend interim BMP stormwater runoff prevention measures be taken immediately, regardless of any other issues, to address ongoing sediment laden polluted run off that legally should be addressed, with no wait period for any process related to this EA and project. The exigent state of the salmon and other species in this watershed demands our immediate attention and action. 1. BMP issues: While the EA describes many important and potentially useful contributions to protect Redwood Creek salmon, the four years of construction that entails would need to be scrupulously supervised to assure BMPs are rigorously followed.**

***Comment S3.14 Response***

This comment does not provide specific information on the potential sources of stormwater runoff on CDPR or NPS property. The project includes the removal and restoration of degraded trail facilities and the improvement of the trail. The number one purpose of the project as identified in Section 2.2, “Purpose and Need” is to “reduce or eliminate adverse effects of the Redwood Creek Trail on Redwood Creek, its floodplain, and the multiple drainages to the creek crossed by the trail”. Much of the trail’s current alignment is within the Redwood Creek floodplain, which likely is increasing the amount of fine sediment reaching Redwood Creek. Increased fine sediment loads have a direct adverse effect on the viability of listed species. The fords crossing the creek contribute fine sediment and nutrients to the waterway directly or through runoff, and the presence of horses in the creek in certain seasons has the potential to disturb spawning Coho salmon and steelhead. The Project would create a more environmentally sustainable trail by improving habitat and hydraulic conditions in and around Redwood Creek.

As identified in the EA/IS, “Best management practices (BMPs) would be employed during construction and are integral to the project design. The Project also would comply with all required permits and approvals, such as a SWPPP and a Lake and Streambed Alteration Agreement, if required. The following measures were identified to eliminate or minimize the degree of adverse effects that could otherwise result from project implementation. These measures would be implemented during construction, as appropriate for specific activities being conducted. They are considered part of the proposed Project and, therefore, are not identified as separate mitigation measures.”(EA/IS p. 20)

***Comment S3.15***

**Trail use enforcement issues: NPS and State Parks have stated they are already having serious enforcement problems with MTBs now using Redwood Creek trail during the day, and also with unlawful night riders. There is presently signage to designate lawful use, but no enforcement regarding illegal use. This enforcement problem will logically be exacerbated if a connector trail is hooked directly to the Horse/hiker trail and the MTB use volume is increased. Therefore we recommend that: • A physical barrier be placed between the two connected trails to properly signal the distinction in use • There be budget for enforcement measures and serious consideration on how to achieve proper enforcement before opening up additional trail access.**

***Comment S3.15 Response***

NPS and CDPR will continue to monitor use along the Dias Ridge Extension Trail and Redwood Creek Trail. The combination of signage, law enforcement, and assistance from visitors will reinforce permitted uses of the trail.

Please refer to Responses M1 “Bicycle Impacts and Bicycle Use Enforcement” and M3 “Design Features to Reduce Illegal Bicycle Use on Redwood Creek Trail and Miwok Trail” in the Themed Master Responses to Comments.

***Comment S3.16***

**Converting a low use trail to a high use trail: According to NPS, there has been no study to estimate the changing volume of Redwood Creek Trail use when it is changed from an informal trail (2 feet wide in many places) to a much higher volume trail, and this should be done and the results made public before any construction.**

***Comment S3.16 Response***

Please refer to Response M8 “Traffic and Parking Pressure” in the Themed Master Responses to Comments and to Responses S2.2, S2.3 and S2.17 in the in the Responses to Specific Comments.

***Comment S3.17***

**There is already proof by citizen advocate hikers that increases in the use of Redwood Creek trail are significant when parking is limited and users, even with small children, will make the hike from the beginning of the Redwood Creek trail from State Highway 1 to Muir Woods.**

***Comment S3.17 Response***

Please refer to Response M8 “Traffic and Parking Pressure” in the Themed Master Responses to Comments and to Responses S2.2, S2.3 and S2.17 in the Responses to Specific Comments.

***Comment S3.18***

**Capacity Study of Visitor Impacts: Without a study we cannot recommend any project and therefore recommend the "No Action Alternative A". Watershed Alliance of Marin recommends a comprehensive study of the existing Dias Ridge trail on all special status and potential listed species considered as impacted before we provide support for further projects. We have reason to believe that improvements intended for special status species have instead resulted in their decline since the trail's completion and that increased use by hikers, equestrians and mountain bikers may have degraded habitat and depleted at risk populations. Until these issues can be resolved we would like to see the priorities of the State Parks and NPS reconsidered and focused more on habitat protection and restoration rather than visitor experience.**

***Comment S3.18 Response***

Please refer to Response M8 “Traffic and Parking Pressure” in the Themed Master Responses to Comments and to Responses S2.2, S2.3 and S2.17 in the Responses to Specific Comments