



Steve Ortega
03/13/2007 09:55 AM
PDT

To: Karen Cantwell/GOGA/NPS@NPS, Ann Dolmage/GOGA/NPS@NPS
cc:
Subject: Fw: Westlands and Creek Restoration Project Big Lagoon

----- Forwarded by Steve Ortega/GOGA/NPS on 03/13/2007 09:54 AM -----



Steve Ortega
03/11/2007 11:07 AM
PDT

To: MStevenson@jsanet.com
cc: Carolyn Shoulders/GOGA/NPS@NPS
Subject: Fw: Westlands and Creek Restoration Project Big Lagoon

Another comment.

Steve O.

----- Forwarded by Steve Ortega/GOGA/NPS on 03/11/2007 11:06 AM -----

Nancy Hornor
03/10/2007 04:03 PM
PST

To: Steve Ortega
cc:
Subject: Fw: Westlands and Creek Restoration Project Big Lagoon

Nancy Hornor
Planning Division Chief
Golden Gate National Recreation Area
(415)561-4937

----- Forwarded by Nancy Hornor/GOGA/NPS on 03/10/2007 04:08 PM -----



"Maureen Pinto"
<oceanridermp@prodigy.net>
03/05/2007 10:43 AM
PST

To: "GOGA Planning" <GOGA_Planning@nps.gov>
cc:
Subject: Westlands and Creek Restoration Project Big Lagoon

Ocean Riders response to preferred alternatives chosen for Wetland and Creek Restoration at Big Lagoon, Muir Beach.

Submitted March 5, 2007

Restoration Alternative 2 – Creek Restoration.

Ocean Riders presently has challenging space limitations to manage the 18 horses we need to stay financially viable. With the reduction of Field #7 and loss of our grass arena, this will increase our challenges. A herd of 3 is not a healthy 'herd' emotionally or from a management standpoint. Horses bond in twos. With three, one horse is 'left out'. When two people go riding, one horse must not be left alone so herd management must become flexible and an extra space is needed to hold the third horse with companion horses. To help remedy this situation, Ocean Riders proposes the following:

- We request the minimum amount of land possible is taken from Green Gulch Field 7 for Frog Habitat. While we support protection of this endangered species, it is stated that this action provides *Minor Beneficial* changes in extent of CRLF habitat. We hope this loss to the horses is a worthwhile effort because it definitely impacts our limited usable space. We request a native windbreak be

M-1

M-2

planted along the new fence line. The relocation placement of the shelter by NPS to be determined in conjunction with the Green Gulch community.

M-2

□ Allow Ocean Riders to restore the back paddock behind stall #8 to have more flexibility in managing the Green Gulch horses. If we lose a herd horse during the winter, as has happened for two winters in a row, we are unable to introduce a new horse into that herd until the ground is dry and the herd can gradually become accustomed to the new horse. This is a loss in income. The additional paddock would solve so many of our management challenges that we face without increasing our number of horses. We request this paddock restoration be done BEFORE the wetlands restoration project begins so we can have more options in how we manage our present number of horses, especially with the squeeze on space during the construction period. This paddock can be restored to have no impact on the intermittent watercourse.

M-3

M-4

□ When the levee road is removed and the emergency access becomes the Green Gulch Road, we request enough space is left next to the new locked gate so Ocean Rider's Kawasaki Mule can get through for daily feeding without having to unlock the gate. We request a key to this gate for emergency purposes in case we have an vet call for a pasture horse that cannot be brought in due to illness or injury.

M-5

□ With the levee road removed, Ocean Riders loses the only flat area of riding which, even though limited, is so important to our horses' mental and physical health. As horses age, they need to 'warm up' before they start climbing hills. If horses are recovering from an injury, they are sometimes restricted to flat riding for a period of time. And for trail health as well as horse health, after a heavy rain, we avoid riding the slippery steep trails. We have used the Levee Loop for these purposes. When considering access from the parking lot to Muir Beach we ask that you consider a HORSE SAFE BRIDGE to connect from the Green Gulch trail over the creek to the proposed multi use trail along PacificWay. During the busy summer days we seldom would be using this but often during quiet winter days this loop would be most important to us for the many reasons stated above. We envision this bridge to be similar to the crossings on the Warm Springs Trail in Tennessee Valley, but wider, with railings.

M-6

Fill Disposal Alternatives:

□ We have permission from Green Gulch to request that some of the excavated fill material be used to raise the sunken paddocks (we refer to them as the Pony Paddocks) across from the Pelican Inn. They become a stagnant mosquito-breeding pond after first minor rain, rendering them immediately unusable for the rest of the season. Raising them and installing better footing and proper drainage would allow for extended use during the transition seasons (Fall and Spring) to better manage our Green Gulch horses and possibly help protect the flat field. With enough improvement, including run-off control, possibly we could put in portable shelters so they could be used year round for 3 of the pasture horses, allowing brief times to 'rest' the flat field.

M-7

Public Access Alternatives:

While we favor ALTERNATIVE B3 we feel the plan does not go far enough to consider the public transportation issue. We are very concerned about the proposal to increase the size of shuttle buses to 35 feet and running even more frequently at 20 minute intervals, not addressing the beach access issues. Talk about Environmental Impact! The rural feeling of Frank Valley changes for the worse with the adverse sounds and smells of large buses' air brakes and fumes, not to mention the safety issue on the narrow winding roads. The buses presently used are very often 'over the line'. I've come to a screeching halt MANY times to allow a bus to round its' curve. Too many tourists who rent cars are not skilled in watching for these behemoths that round the corners OVER the line. Increasing the bus size is a terrible idea that only provides funds for Muir Woods, while impacting both residents and visitor's quality of experience in the rest of the valley. We need SMALLER buses, ie West Marin Stage that can go into the Muir Beach parking lot as well, thus encouraging public transit to and from Muir Beach, not just Muir Woods.

M-8

Bridge Alternative BR3:

We appreciate the expansion of a two-way bridge but hope its nature does not take away from the quaint atmosphere of Muir Beach. We are sympathetic with the Muir Beach communities' need for a spur road that accesses their homes separate from those trying to get to the parking lot on busy days. We would like to see smaller Public Transit buses that could truly serve the Muir Beach visitors and community alike. We have noticed that the addition of the public access path is being called a *Pedestrian Path*. We have been told it will be multi-purpose so believe it should be addressed as such so there are no challenges in the future.

M-9

In summary, we wish to acknowledge the incredible amount of time, effort and money that has gone into this project. The graphs were very helpful in clarifying the purpose and need. We are grateful that the Preferred Alternatives have been chosen which take the least amount of time and money and appear to have the lowest *impact*. In describing the classification of impacts we would like to say we feel, that unless some of our requests are addressed, the impact to equestrians, especially to Ocean Riders, will not be *minor* , but will be between *moderate* to *major* . We appreciate you taking these requests into consideration as you proceed.

M-10

M-11

Respectfully submitted by:
Maureen Pinto
for Ocean Riders of Marin

Letter M: Ocean Riders of Marin (March 5, 2007)

Response to Comment M-1

Comment noted. NPS has worked with the San Francisco Zen Center to adjust the project boundary to reduce the portion of Field 7 removed for inclusion in the project area and thereby minimize impacts on the Ocean Riders equine operation. NPS considers this to be a minimal area for the project. During the preparation of the Draft EIS/EIR, we found it necessary to revise the location of the proposed emergent wetland to protect frog habitat—it was relocated to include a portion of the lower end of Field 7. This will reduce construction impacts on the existing frog habitat. While the analysts for the EIS/EIR have not found the project benefits for frogs to be “major,” the species is listed as threatened on the federal endangered species list, and any gain toward a viable population is valuable.

Response to Comment M-2

Earlier in the planning of this project, NPS adjusted the boundaries of the project area to reduce the area of Field 7 within the project boundaries, thereby minimizing impacts on available area for horses. The location for one of two emergent wetlands for CRLF habitat was also adjusted during preparation of this EIS/EIR to reduce potential construction impacts to CRLF, and the inclusion of the lower portion of Field 7 in the project area made this possible. While the EIS/EIS does not find that benefits to frogs are major, any benefit for this threatened species is worthwhile, and, indeed, critical, given their extremely rare sightings in the project area in recent years. The ponded water in their current habitat is dependent upon artificial structures that also make flooding worse (the levee and the undersized culverts under the levee), and the CRLF will benefit from the more natural wetland function of the area. NPS is willing to discuss the planting of native willows at the new boundary of Field 7.

Response to Comment M-3

NPS plans to reposition the horse shelter and fencing when they are dismantled in the project area and will coordinate with the San Francisco Zen Center and Ocean Riders as necessary to ensure a mutually acceptable solution.

Response to Comment M-4

NPS is willing coordinate with Ocean Riders to allow use of the back paddock at the Golden Gate Dairy temporarily during construction because some horses will need to be relocated during that period. Long-term use of the back paddock would be determined through the NPS Equestrian Planning process.

Response to Comment M-5

NPS will provide Ocean Riders with gate keys or codes to allow emergency access through the gate on the access road. NPS will also work with Ocean Riders during the design and installation of the gate to allow access for feeding equipment without needing to open the gate, provided that there will not be enough room for other vehicles to also pass around the gate.

Response to Comment M-6

NPS has not confirmed the need to replace the bridge, which was replaced recently and is in good condition, for this project. If replacement is necessary to accommodate the detailed project design, NPS would consider a horse-accessible bridge. As part of a separate planning process, NPS is planning other trail improvements in the vicinity of Golden Gate Dairy that would provide additional relatively level trail access, such as to the Redwood Creek Trail and to the equestrian facility on State Parks land in Santos Meadow.

Response to Comment M-7

The paddock area across from the Pelican Inn is on property owned by the San Francisco Zen Center, but it is a wetland under the jurisdiction of USACE, as is most of the rest of the project site. NPS and Marin County are working to obtain a permit from USACE for all project actions, and we are designing actions to minimize the area of fill in the jurisdictional wetlands. If the total area of fill in wetlands increases compared to the existing condition, it is possible that USACE would require NPS to create new wetlands elsewhere as mitigation. NPS does not plan to add to the total area of fill in jurisdictional wetlands by placing fill in the horse paddock area. However, please note that groundwater elevations are predicted to lower somewhat across the whole site as a result of project actions, a phenomenon that likely would benefit the equestrian use of the site. It is possible the paddocks might be somewhat drier, although they still would be a component of an active floodplain.

Response to Comment M-8

Shuttle bus sizes and routes are not a component of the proposed project. The bridge would be designed to standard Marin County specifications.

Response to Comment M-9

The pedestrian path noted in this comment is proposed as a multi-use and accessible path. It will accommodate pedestrians, horses, and bicycles. We

anticipate that visitors on road bikes would be more likely to bike on the road than on the path.

Response to Comment M-10

Comment noted. Thank you for your support and your participation in the environmental review process.

Response to Comment M-11

As discussed on page 4-228 (Impact REC-R5), the proposed habitat restoration at Muir Beach would use about 25% of Green Gulch Farm's Field 7. Field 7 is now pasture for four horses belonging to Ocean Riders and would support three horses after restoration. In addition, as discussed on page 4-228, the riding ring west of the access road would be removed to accommodate restoration, although the stalls at the corner of Hwy 1 are expected to remain available. The riding ring is used primarily for turning horses out rather than for schooling or other "ring-specific" uses, so the loss of the riding ring thus would translate into a further decrease in the availability of temporary turn-out space. This loss is expected to be particularly important to visiting equestrians, who are the ring's heaviest users.

NPS is aware that, while equestrian opportunities continue to be available nearby, facilities in the Muir Beach area are limited, so any reduction in those uses will be keenly felt. The decrease in the size of Field 7 was evaluated as a minor effect because it would involve only one horse. By contrast, the loss of the riding ring would affect a larger number of horses and riders, potentially causing some out-of-area users to select another destination, and was identified as a moderate adverse effect (page 4-228). These findings, and the accompanying statement that the overall number of equestrians affected by the loss of the riding ring would be small compared to the total number of equestrians using the site and broader region (page 4-228), were in no way intended to downplay or disregard the importance of that loss to the individuals or overall Ocean Riders operation affected by it.

N



SIERRA CLUB MARIN GROUP

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March 5, 2007

RECEIVED
2007 MAR -7 P 1:52

MARIN COUNTY
COMMUNITY DEVELOPMENT
AGENCY

Marin Community Development Agency (CDA), Attn: Tim Haddad
Golden Gate National Recreation Area (GGNRA), Attn: Brian O'Neill

The Sierra Club offers the following comments on Wetland and Creek Restoration at Big Lagoon Draft Environmental Impact Statement/Report (DEIS/R).

Comment 1: Future Flood Control

In 1996, after GGNRA assumed the Project, GGNRA Superintendent Brian O'Neill stated:

"The Park Service is going to commit itself, publicly, with all of the strength of our conviction to our commitment to do the Big Lagoon Restoration Project... In that regard, we have approached our non-profit support organization...about their willingness to assist in raising private sector support...our proposal would be to utilize a significant portion of the revenue we generate from the fee-program and to leverage that with private sector support under a fund raising effort our Association is committed to do, so we will be able to probably realize the Big Lagoon Restoration Project together with other improvements in the watershed on a schedule that's very similar to that which we've been talking about under the current concept.....The last thing that the Park Service wants...to lose the momentum that we have on Big Lagoon.

The history of the Big Lagoon Project is an important context, because the Sierra Club believes that this 2007 DEIS/R does not study the impacts from future flood control measures that may be proposed during the wait for funding. Thus any future flood control measures must be carefully evaluated with their own separate environmental reviews. The importance of careful environmental review can be seen by the history of GGNRA's controversial 2002 Environmental Assessment (EA) for the "Lower Redwood Creek Interim Flood Control Measures." This project was proposed after years of gradually increasing flooding, yet was presented as a habitat enhancement. As a coalition of environmental groups (Coalition), including the Sierra Club, commented:

We do not believe the project is an instream habitat enhancement project for salmonids. The primarily flooding rationale for this project was acknowledged by officials from the National Marine Fisheries Service (NMFS) and California Regional Water Quality Control Board (RWQCB) at a meeting at NMFS offices in Santa Rosa California on 8/21/02...removing fish from their habitat, bulldozing that habitat, and then allowing fish to return to a habitat that has been rendered substantially useless... will inevitably lead to salmonid mortality.

The Regional Board staff, after extensive discussion and site visits, refused to issue a clean-water permit for the flood control project. In response, GGNRA and Marin County went over the heads of the local Board staff to circumvent the permit process by claiming that the Board "didn't have time" to process the application. As a result, the flood project went forward on a claimed "emergency" basis without normal permits or adequate EA. In fact, the only emergency that actually existed was GGNRA's failure to convince Board

N-1

Sierra Club to CDA/GGNRA Re Big Lagoon DEIS/R 3/6/07 Page 2

staff of the environmental merits of the Project. Although GGNRA downsized the flood control project by almost half in response to complaints from the Coalition, the project impacted over 400% more endangered coho than GGNRA had predicted and virtually extirpated endangered California red-legged frogs from the project area. The Sierra Club is determined that GGNRA will not repeat this kind of environmental review “process” and environmental “restoration” project. We have no objection, while this Project awaits funding and construction, to environmentally sensitive pruning of creekside vegetation to discourage flooding, or to mitigated “glory-holing” from the Pacific Way right of way. However, we specifically request confirmation that this 2007 DIER/S is not a programmatic substitute for appropriate environmental compliance for flood control projects that involve bulldozing stretches of the creek. We believe that such projects, if “needed”, must be justified by a fair, careful, and non-emergency environmental review.

N-1
cont.

Comment 2: Bridge Length vs Width

In 1993, none of Cal Trans’s alternatives included a bridge: *“I do not believe that the stream can be re-directed [only] south of Pacific Way as shown in the plans...Why not let the stream do what it wants to do [and] instead elevate Pacific Way over its low spot. This is certainly within the area of Cal-Trans’ expertise; it would help flood control for upstream residences”* (Bennett to NPS 11/5//93). Fourteen years later, we finally have plan alternatives that include a new bridge. However, the DEIS/R notes that the 300-ft bridge length allows for better hydrological functioning than the 150-foot bridge, but is not the preferred alternative because its comparatively modest hydrological advantage comes at the cost of a significant increase in cost compared to the 150-foot bridge. We request that the DEIS/R provide back-up data because we believe this comparison is poorly justified.

N-2

First, we do not believe that a 300-foot bridge is possible given the constraints. The longest bridge possible is more likely only 50% longer than the 150-foot bridge (i.e. 225 feet, not 300 feet). The DEIS/R thus uses the 300-foot bridge functions as a “straw man” to substantially overestimate the cost difference between the longest bridge possible and the 150-foot bridge. Second, the DEIS/R uses a “mean” sea level rise of 0.7 feet to calculate impacts. We believe this to be conservative estimate and that use of a sea level rise at the higher end of the IPCC range would show greatly increased flooding potential. Thus use of a sea level rise at the upper end of the IPCC estimates would likely show that the DIES/R has substantially underestimated the hydrological benefits of the longest bridge possible. Taxpayers 50-years in the future would not look kindly on having to re-do an undersized 150-foot bridge. Lastly, the DEIS/R notes that Redwood Creek is one of only four creeks in Marin County that provide habitat for endangered coho and that these coho have unique genetic diversity (3-49). These facts argue for the longest possible bridge spanning the floodplain as doing the best for the creek’s hydrology and salmon.

N-3

N-4

Nonetheless, we are concerned about the aesthetic impact of the bridge width, which the DIES/R does not specify but which appears to be 2 x 12-ft travel lanes, 2 x 2-ft shoulders and 2 x 3-ft pedestrian lanes, for a total width of 36’. This is significantly wider than connector road segments, is out of character with the community, and would encourage excessive speeds. We suggest instead a 26-ft road width (2 x 10-ft travel lanes and 2 x 3-ft shoulders) as a “context sensitive” traffic calming measure along the 225-ft bridge length. This 26-ft width would allow pedestrians to walk along the shoulders as they do now. If a future pedestrian enhancement were desired, then that could be considered and funded as a separate structure, as was proposed for the Coyote Creek Bridge in Tam Valley. The visual mass (area) of a 225x26 bridge is only 8.3% greater than a 150x36 bridge. Aesthetic considerations should adjust the *width* of the bridge, not the *length*.

N-5

Sierra Club to CDA/GGNRA

Re Big Lagoon DEIS/R

3/6/07

Page 3

Comment 3: Study Alternate Sea Level Rise

The DEIS/R analyses several alternatives, but all with the same "mean" sea level rise assumption (0.7 feet by 2060). Sea level rise will materially impact both flood levels and habitat in the Project area. The proposed bridge will last longer than 2060 and sea levels are projected to rise unabated through the end of the century. We believe it prudent to run the project models for all bridge and habitat alternatives with the sea level rise predicted at the upper end of the IPCC 2100 projections (1.6 feet).

N-6

Comment 4: Provide Stream Alternative Supporting Data

While it is unrealistic to restore the Project area to its historic condition, its present degraded condition, while creating flooding problems, nevertheless also creates good winter/spring salmonid habitat available nowhere else in the watershed. Given these unique coho, GGNRA should protect and expand the Project's winter/spring habitat that may be irreplaceable and critical to their survival. The DEIS/R provides insufficient justification for its claim that the Project will provide adequate replacement winter/spring habitat. For example, 2-year berms were reduced to 1-year berms and the area by the current levee borrow pit is proposed to be excavated...presumably to protect winter/spring habitat. But unknown is whether preferred 6"-12" deep habitat exists at all and if so, then how the area and the duration at this preferred depth differs among the various alternatives. Thus it is not possible to comment on the adequacy of this important habitat component of the Project. Likewise, the ~35 foot width between the berms is presumably designed to balance sediment flow capacity with salmonid habitat, yet without the background data to support the chosen ~35-foot width, it is not possible to comment on the appropriateness of the "balance." Since the prior 2002 Pacific way Flood Control project was veneered as a "restoration project," the Sierra Club is particularly interested to review the data underlying any proposed balance between flood control and habitat restoration.

N-7

N-8

Comment 5: Monitor and Adaptively manage Back-Beach Lagoon

The DEIS/R concludes that the Project will not impact projected closure dates or duration for the small lagoon behind the beach. A change in closure dates and duration can be important, as can be seen from the recent fish-kills at Pescadero Marsh, which may be the result of incorrectly projected impacts from a local restoration. The DEIS/R conclusion appears poorly supported and we would request additional review of this "no change" conclusion. Regardless of the ultimate DEIS/R conclusion in this regard, we would request that this back-beach lagoon be monitored and the DEIS/R be expanded to include modest adaptive management of this lagoon in the future. Future significant changes to this back-beach lagoon should include additional environmental analysis.

N-9

Comment 6: Reintroduce Western Pond Turtle

The DEIS/R notes (3-42) that the western pond turtle (a state listed species of special concern) has been extirpated in the project area and includes the possibility of reintroduction only of the red-legged frog (4-159). The Project should also include the reintroduction of the western pond turtle.

N-10

Comment 7: Purchase All Unused Redwood Creek Water Rights

The DEIS/S notes that San Francisco Zen Center (SFZC) retains an appropriative water right (which has not been used since 1989) to divert up to 47 acre feet from Redwood Creek, but that *“as part of the project, SFZC will make an agreement to have the right abandoned, or else NPS will acquire the right. As such, this is not expected to have an adverse impact on SFZC’s water right or on future ecological uses of the site.”* It is critical to this Project that this transfer or abandonment actually occur, but we do not believe the language in the DIES/R insures this outcome despite the fact that this has been stated as desired for a number of years.

Although the map in GGNRA’s 1993 Water Rights Study appears to show Green Gulch within the Tamalpais Water Company tracts that had their riparian rights severed, the DEIS/R’s FMV appraisal of the value of SFZC’s appropriative water rights should also include an assessment of SFZC’s riparian rights (if any) on Redwood Creek. All of SFZC’s water rights on Redwood (both appropriative and riparian) should be acquired by GGNRA, rather than formerly abandoned. Abandoned appropriative water rights can later be claimed by others and while we believe that the current status of endangered status of the salmon in Redwood Creek would preclude anyone from exercising this water right in the future (and any attempt to do so would be vigorously protested by the Sierra Club), this is a possible dispute that can be eliminated now by GGNRA acquiring the water right. Alternately, SFZC could dedicate their water right to in stream uses under Water Code section 1707.

N-11

MMWD, at the top of the watershed, also has unused water rights that if exercised would impact Redwood Creek and Big Lagoon. In an ill-advised 1999 scheme, MMWD proposed to use some of its water rights in the headwaters of Redwood Creek for bottled water, yet the DEIR mentions only retiring the SFZC rights. GGNRA should make same request to MMWD’s to acquire or donate to instream uses their unused Redwood Creek water rights.

Comment 8: Green Gulch Farm Should be “Salmon Safe”

The DIES/R notes impairments flowing into the Project areas from Green Gulch Farm. Green Gulch should agree and the DEIS/R should require as a mitigation that Green Gulch will adopt Salmon-Safe Farming standards to insure that these inputs are reduced.

N-12

Comment 9: Purchase Audubon Canyon Ranch (ACR) Parcels Adjacent to Pacific Way

The DEIS/R notes the purchase of SFZC’s water rights as part of the Project, however, ACR owns parcels previously offered to GGNRA on the west side of Pacific Way between the bridge and the parking lot entrance. We believe it would b in GGNRA’s long-term best interest to own property on both sides of Pacific Way and we encourage the fair-market appraised value (FMAV) of SFZC’s water right to also include the FMAV of Audubon Canyon Ranch’s Pacific Way parcels with the intent to consummate a purchase.

N-13

Comment 10 Spoils at the Reservoir Site Should Be Compacted to Allow a Water Tank

The DIES/R notes: "MBCSD pumping decreased instantaneous downstream flows in Redwood Creek by as much as 0.09 cfs. This decrease in flow is primarily significant in the late dry season, when flows are naturally on the order of 0.1 to .2 cfs. Lower Redwood Creek completely dries up naturally approximately every 4 years however, MBCSD pumping may increase this frequency to approximately once every 3 years" (3-7). The DIES/R also notes that the preferred fill site "was intended for use as a reservoir for hillside crops" (2-29) and that MBCSD has considered increased storage for residential uses but nothing has happened. Yet the DEIS/R does not study the obvious connection between these observations, thus potentially missing an opportunity that could benefit both salmonids and the local community.

Increased storage capacity could allow MBCSD to decrease pumping during the late dry seasons, which would help salmonids. A similar project to increase storage to avoid dry-season pumping impact on salmonids is being managed by PRNS in nearby Pine Gulch Creek. Increased storage for MBCSD would also increase fire flow capacity and proved for greater flexibility in water system emergencies. Funding (e.g. Prop 50) is available for exactly these types of projects that enhance both water supply reliability and salmonid habitat, yet if the most likely site for the increased storage is completely filled with un-compacted spoils from the Restoration, then this significant opportunity will have been lost. Thus we urge that the DIES/R amend its preferred disposal plan to use the reservoir site only to the capacity and with approved compaction techniques that would allow a water tank to be constructed on the site at some future time. This would provide an incentive for MBCSD to take action on increasing its storage capacity

N-14

Furthermore, we believe MBCSD's pumps drying out Redwood Creek, as described in the DEIS/R's is a violation of the requirements of MBCSD's water right that the DIES/R accepts as a given. The DEIS/R should clarify whether the actions it describes are indeed violations and if so, then specify a different and better monitoring program than exists now that will insure that MBCSD does not violate its agreements. If the only result from MBCSD violating its water right agreements is the undocumented death of endangered salmonids, then there will be no incentive for MBCSD to take action on increasing its storage capacity.

N-15

Comment 11: Elevate Pacific Way near the Re-graded Parking Lot

The DEIS/R proposes to improve the bridge at the beginning of Pacific Way and to improve the parking lot at the end of Pacific Way, yet leave unchanged the ponding problem in the middle, outside the entrance to the parking lot. Park visitors should not have to cross a multi-million dollar bridge that avoids winter floods, and then have to ford a 50' wide 1' deep puddle in order to access the improved parking lot. Elevating the segment of Pacific Way outside the parking lot could be a use for Restoration spoils. Repairing this segment of Pacific Way seems like a minor but appropriate addition to the over-all project. Elevating this section of Pacific Way would likely require re-grading the north end of the parking lot higher to match, but again that seems easily done by re-grading the southern end section lower, which would also facilitate overwashing of the parking lot that would then be gently graded toward the creek.

N-16

Comment 12: Study Location of Paths

The DEIS/R pedestrian path alternative in Figure 2-13 shows the proposed Project access from the parking lot at the SW corner, similar to the current access. This "indirect" alternative routes beachgoers through dune habitat despite the DEIS/R noting (3-36) "*The [dune] lobes that occur at Muir Beach are disconnected from one another by well-used visitor paths...preventing natural dune formation process.*" Furthermore, the Figure 2-13 alternative would strand wheelchairs behind the dunes, out of sight of the ocean.

Figure 2-12 shows the path running from the middle of the parking lot directly to the beach. The Sierra Club expresses a preference for a more direct route with access from the middle of the parking lot as shown in Figure 2-12, but modified (angled southwest as in Figure 2-13) to avoid the back beach lagoon entirely and to decrease the distance to the coastal trail. Our observation, based on 18 years of informal monitoring, is that visitors, seeing the ocean directly from the parking lot, tend to jump fences and ignore signs in an attempt to travel in the more direct route to their destination. Furthermore, there is significant foot traffic from the parking lot to the private "little beach" which is north of the public beach. Thus while Figure 2-13's indirect pedestrian access at the SW corner of the parking lot may in theory have less environmental impact, in practice, these impacts must be added to those that will inevitably come from uncontrolled social access directly to the beach. A more direct route would also provide views of the ocean for wheelchairs.

N-17

Access through the sensitive habitat should be by an elevated boardwalk that allows environmental processes to continue. The rip-rap that now allows the coastal trail to connect to the current pedestrian bridge from the parking lot should be removed and the coastal trail re-routed to the beach along the base of the hill avoiding the dunes. The connection between the coastal trail and the beach access should be across the beach.

Lastly The DIES/R does not appear to analyze increased traffic (foot and bike) that will occur on the trail connecting the Coastal Trail to Green Gulch when the Levee Trail is removed. The DIES/R notes there will be emergency access along this trail segment, but other uses will also increase. The DIES/R should propose mitigations to reduce new impacts to a level not exceeding current impacts. Furthermore, the proposed increase in the width of this trail to 11 feet is excessive. The renovation of this trail should be limited to vegetation removal and deminimus cut-and-fill not requiring retaining walls.

N-18

Comment 13: Restore Trees Lining the Creekside Edge of Pacific Way

The DIES/R does not study the possibility to restore the aesthetically important line of trees lining the creekside of Pacific Way between the bridge and the parking lot entrance. These are Monterey Pines planted in the 1940's that distinctively mark the entrance to Muir Beach yet are nearing the end of their biological lives. The DEIS/R's proposed new pathway along the current creek channel should include interplanting with a native tree species (e.g. Douglas Fir) to preserve the ambiance of Pacific Way.

N-19

In conclusion, the Sierra Club appreciates GGNRA's attempts to correct inadequate public input to its flood control projects with increased public input into this restoration project, which we believe has pre-resolved an number of contentious issues and diminished the need for significant comments on this DIES/R. Thank you for the opportunity to comment.

Gordon Bennett

Gordon Bennett, Sierra Club Marin Group Conservation Chair

Letter N: Sierra Club Marin Group (March 5, 2007)

Response to Comment N-1

In order to provide improved winter access along Pacific Way during the period prior to construction of the larger restoration project, the proposed action presented in the Final EIS/EIR includes interim flood reduction measures. Please refer to Page 2-7 of the Project Description, which describes the interim flood reduction measures in detail. A minimal amount of necessary dredging will be performed, and it will be conducted in an environmentally sensitive manner.

NPS and the County do not intend to perform any of these actions on an emergency basis and therefore have included these interim measures in this Final EIS/EIR. Both NPS and the County will obtain all appropriate regulatory permits prior to carrying out the actions. The environmental analysis in the Final EIS/EIR explicitly addresses the potential impacts of these activities at the project (rather than programmatic) level and identifies mitigation measures where appropriate. As such, no separate NEPA or CEQA environmental review is necessary for these actions, and the EIS/EIR represents a fair, careful, and nonemergency environmental review.

Response to Comment N-2

In consultations with a bridge engineer after the close of the public comment period on the Draft EIS/EIR, it was determined that a more realistic “longest possible” bridge is about 250 feet, not 266–300 feet. The cost difference is not substantial; however, the 250-foot bridge has been selected as the preferred alternative because of its superior benefits. See also MR-1.

Response to Comment N-3

MR-3 discusses the potential effects of more extreme sea level rise. The upper end of IPCC (2007) values for 2100 is 1.85 feet, using 2010 as a baseline. Additional modeling with an ocean level increase of 6.5 feet (from 3 to 9.5 feet NGVD) was performed. The conclusions of this analysis indicate that water levels upstream of the footbridge would be increased by less than 1 foot (the maximum increase for existing and design conditions is approximately 0.2 and 0.5 feet, respectively) and that water level increases do not extend up to Pacific Way. Also note that for the scenario that was modeled, flood levels under the proposed project are predicted to be 1 to 2 feet lower than existing conditions. Please refer to MR-3 for a more complete discussion of the effects of sea level rise.

Response to Comment N-4

Please review MR-1. A longer Bridge Alternative has been selected as preferred, in part because it would be the most protective of salmonid habitat.

Response to Comment N-5

Comment noted. As discussed in MR-1, the maximum width of the bridge has been reduced from 36 to 32 feet in the preferred Bridge Alternative. However, the exact width will be determined during the design phase.

Response to Comment N-6

Please refer to Response to Comment N-3 and MR-3.

Response to Comment N-7

Please refer to MR-2.

Response to Comment N-8

The preliminary design dimensions of the low flow channel were selected to allow hydraulic modeling of the preferred alternative. The channel dimensions are first based on existing channel dimensions of Redwood Creek approximately 0.5 to 1 mile upstream at the Banducci site. During the detailed design phase, the following additional analyses will be performed to further refine channel dimensions.

- Historic flow data will be analyzed to better quantify the frequency of smaller high flow events (e.g. the 1- and 1.5-year events). The *Redwood Creek Feasibility Report* (PWA 1998) included a flood-frequency analysis for the 2- to 100-year events, and the *Big Lagoon Feasibility Report Addendum* (PWA 2004) includes analysis of 1999 to 2003 high flow data. During the detailed design, the analysis of high flow data would be expanded to include all data available at that time.
- The “bank full” flow will be selected for different channel reaches. In the upstream portion of the project site (e.g., upstream of Pacific Way), the 1.5- to 2-year event likely will be used for channel sizing. Downstream of Pacific Way, a smaller flow will be selected to increase the frequency of out-of-bank flows to maximize ecosystem restoration. Selection of appropriate design flows will be based in part on further identification and analysis of stable reference reaches within the watershed.

- A suitable range for channel equilibrium slope will be determined using a variety of empirical and analytical methods. The channel planform (i.e., sinuosity) can be modulated, as practical, to achieve a channel gradient that is considered stable. However, the channel gradient also will be dictated by the existing constraints to channel location (e.g., property lines, Pacific Way, etc.)
- Upon final selection of the channel location and gradient, low flow dimensions will be refined. This refinement may include varying channel dimensions at outside meander bends, etc. Selection of low flow channel dimensions will be based on local hydraulic geometry relationships, measurements of reference reaches, and hydraulic analysis. There are no apparent constraints on channel depth or top width; the height of the low flow berms can be adjusted as needed to achieve the desired channel depth while maintaining a uniform channel gradient.

Response to Comment N-9

Please refer to Response to Comment F-11 for a discussion of lagoon closure. We understand that the Gulf of the Farallones National Marine Sanctuary's Beach Watch program captures information regarding the open/closure status of the backbeach lagoon. NPS will develop and implement a long-term monitoring program that would include monitoring of the backbeach lagoon, both immediately prior to, and following project construction.

Response to Comment N-10

Comment noted. The NPS inventory of western pond turtles indicates very low numbers within the areas managed by NPS in the Marin Headlands (Fong 2002), and actions are needed to ensure their long-term viability. Although the habitat conditions at the project site may not be ideal for the western pond turtle, NPS will evaluate onsite reintroduction following construction of the project. Factors used in this consideration will include potential for natural colonization from outlying areas, availability of suitable nesting habitat, and ability to mitigate major barriers to movements and human sources of mortality (e.g., Hwy 1).

Response to Comment N-11

NPS appreciates the commenter's concern regarding the San Francisco Zen Center's appropriative water right. NPS is currently in negotiations with SFZC regarding the steps necessary to allow the restoration project to move forward, and language in the Final EIS/EIR accurately reflects NPS's intent to ensure that instream flows are not diverted from the project area due to either appropriative or riparian rights.

NPS agrees that instream flow protection would be beneficial for coho salmon. However, assessment and/or acquisition of any unused Marin Municipal Water District water rights is beyond the scope of the proposed project. .

Response to Comment N-12

The Final EIS/EIR notes that nutrient sources may include inputs from Green Gulch Farm, among others. It is the intent of NPS to work with adjacent land uses to ensure that unnatural nutrient inputs into the project area are minimized. However, assurance of Salmon-Safe Farming standards being applied to adjacent, offsite operations is not part of the project and, furthermore, is not within NPS authority.

Response to Comment N-13

NPS appreciates the comment regarding acquisition of Audubon Canyon Ranch parcels; however, NPS does not plan any actions on the referenced parcels and considers such acquisition to be outside the scope of the proposed project.

Response to Comment N-14

Comment noted. The Big Lagoon project is not incompatible with potential placement of a water storage tank. Placement of fill at the old reservoir pit does not preclude the possibility of placing a new water storage tank there for the MBCSD. NPS recognizes the importance to MBCSD of obtaining a new water storage tank so that impacts to federally listed salmonids can be avoided or reduced during periods of low flow in the creek. With increased water storage, MBCSD would not have to pump as much water during the low-flow periods, and creek flows during critical periods can be better maintained. NPS is willing to work with the MBCSD to site a new storage tank in the fill placement area or other possible areas on NPS lands in order to protect the habitat for salmonids. There are many possibilities of how a tank and fill could be configured for good placement at the unused reservoir.

Response to Comment N-15

MBCSD holds a state water right to pump groundwater at a well near Redwood Creek for use by Muir Beach residents. The water right requires specific conservation measures for pumping during drought periods to avoid or reduce impacts to federally listed salmonids. It is beyond the scope of this project to determine whether specific practices are legal.

Response to Comment N-16

The referenced portions of Pacific Way are not considered by Marin County to be part of this project. The County will look at ponding or drainage issues on Pacific Way during bridge design and after construction. However, this area will be evaluated as part of the visitor parking lot design as well. Hydraulic models can be used to identify whether the berms will be needed to protect the road; it is unlikely they will be needed in the future, and their removal could help drainage of the road. The berms would be evaluated as part of the parking lot design, and any actions related to parking design that can simultaneously improve drainage of the road will be conducted. Work on Pacific Way would be the responsibility of the County and is outside the scope of the proposed project.

Response to Comment N-17

The *Pedestrian Access to the Beach* section of Chapter 2, on page 2-15 of the Final EIS/EIR, refers to the fact that the ultimate location of the pedestrian bridge could range from near its current location to a more direct route, as referenced in this comment. The bridge design and locations must be ADA compliant and minimize adverse impacts to channel form, hydraulic processes, and habitat while providing a quality visitor experience. This includes a connection to the Coastal Trail, which would be less convenient to visitors if the bridge is relocated farther north toward the tidal lagoon. Chapter 2 of the Final EIS/EIR has been revised to clarify NPS's intention to remove riprap on the left bank of Redwood Creek upstream of the pedestrian bridge.

Response to Comment N-18

It should be clarified that the proposed width would be 12 feet, which is the minimum necessary for emergency access vehicles. Emergency calls are made from the Coastal Trail and Pirates Cove, and it is necessary to have an access road wide enough not to slow response time. The original trail was constructed to a width of 12 feet, and a very limited amount of work is necessary to restore that width. Project actions will not actually build a wider trail, but will remove in-grown vegetation that currently reduces the functional width. Upgrades will be limited to vegetation removal, grading, and minor fill, as stated in the EIS/EIR, and would not require any new retaining walls.

Although this trail may receive additional foot traffic after upgrades are complete, this traffic would not represent a new use and therefore would not result in new or significant impacts to recreation or biological resources. Additionally, this trail would be located on an existing trail that is currently used by farm vehicles and equestrians. Overall impacts to natural resources would be reduced because foot traffic from the levee road, which traverses through the center of the site, would be relocated to the path on the perimeter of the restored area.

Response to Comment N-19

Although the Monterey pines along Pacific Way are nonnative trees, NPS does not propose to remove them as part of project actions because they are not expected to spread into the adjacent wetland area. NPS will consider this comment's suggestion of interplanting native trees and discuss this with a qualified landscape architect as part of planning the trail along Pacific Way.

Tomales Bay Association

P.O. Box 369

Pt. Reyes Station, California 94956



late - accepted
○

RECEIVED

MAR 9 9:32 AM '07

06 March 2007

MARIN COUNTY
COMMUNITY DEVELOPMENT
2007

Superintendent
golden Gate National Recreation Area
Building 201,, Fort Mason
San Francisco, CA 94123

EPC
Marin County Community Development
3501 Civic Center Drive, room 308
San Rafael, CA 94903

RE: Draft EIS/EIR
Wetland and Creek Restoration, Redwood Creek, Big Lagoon, Marin County

Dear Sirs:

We recommend adopting a restoration plan for Redwood Creek that would restore the major feature that has been lost, namely Big Lagoon. In order to achieve that goal, the parking lot at the end of Pacific Way *must be removed*. While retaining a much smaller parking area/turn around may be efficacious, the fill associated with removing the parking lot could be used to raise that portion of Pacific Way from the existing bridge to the much smaller parking area, for perhaps 18 cars or less by rotating the parking area parallel to the road and raising it considerably with the fill gotten from the existing parking area, which is historically where the lagoon ought to be.

In addition, we favor alternative BR 4, creating a causeway fully above the flood-plain of Redwood Creek and *allowing* the creek to re-establish its flood plane and lagoon functions. The broader areas and a more fully restored lagoon will give the most chance at success. Otherwise, the project will be primarily an expensive flood control project.

While increasing California red legged frog habitat is worthy and bringing back the salmonid populations that once thrived a major goal, flooding needs to be accepted as a physical reality. We consider that much of the restoration will be achieved if nature is allowed to proceed by strategically removing the man-made obstacles that have proven to be impediments.

Thank you for this opportunity to comment.

Sincerely,

Kenneth J. Fox, President

CC open

O-1

Letter O: Tomales Bay Association (March 6, 2007)

Response to Comment O-1

The Tomales Bay Association's preferences for project features and alternatives are noted. Please note that in response to public comment, the preferred bridge alternative has been changed to BR4. The association's participation in the environmental review process is appreciated.

C. Henry Barner
427 Grandview Avenue
Novato, California 94945
March 3, 2007

P

Tim Haddad, Environmental Coordinator
Marin County Community Development Agency
3501 Civic Center Drive, Room 308
San Rafael, California 94903-4157

RECEIVED
2007 MAR -5 A. 8:59
MARIN COUNTY
COMMUNITY DEVELOPMENT
AGENCY

Re: Draft EIR at Big Lagoon

Dear Mr. Haddad:

A few questions about the DEIR:

1. P. 4-69 Why is no running water being provided where there are picnic facilities and bathrooms? Public health concerns cry out for hand washing facilities where there is food preparation and consumption.
2. P. 4-222 It is stated, "By year 50, all alternatives would be expected to have reached a state of dynamic equilibrium---". Earlier in the DEIR, I was left with the impression that after year 50, more restoration would be required due to factors such as sedimentation build up.
3. P. 4-228 Has consideration been given to just closing the park during periods of heavy construction, especially as it impacts parking and visitor mobility?

P-1

P-2

P-3

I should note that since the County's role is only with the road and the bridge, the above comments are submitted as a private citizen, and not as a Planning Commissioner.

Very truly yours,


C. Henry Barner

Letter P: C. Henry Barner (March 3, 2007)

Response to Comment P-1

Potable water in the lower Redwood Creek Watershed is provided solely by the MBCSD, which operates a groundwater well adjacent to Redwood Creek about a mile upstream of Muir Beach. Data suggest that well pumping can affect flows in Redwood Creek, particularly during dry periods. A water fountain that used to be located at Muir Beach received water from MBCSD, but it was determined in the late 1990s that one of the single largest MBCSD water consumers was the NPS water fountain. Because of the need to conserve water and protect in-stream water flows for the federally listed coho salmon and steelhead, NPS chose to cease potable water services at Muir Beach and removed the water fountain and water faucets.

Response to Comment P-2

The project has been designed such that the potential need for future restoration action is minimized. Although the possibility exists that dramatic future events (e.g., fires, extreme floods) could require additional restoration action, the project has been designed to operate in a state of dynamic equilibrium, and NPS does not have any specific plans to conduct further restoration. Year 50 was used for the purposes of the Draft EIS/EIR to evaluate impacts during the later phases of ecosystem development and represents a reasonable point in the future for planning and impact analysis, considering the increasing uncertainties and difficulty of planning beyond such a time horizon. However, the restoration project is anticipated to be functional beyond a 50-year timeframe.

Response to Comment P-3

Because of heavy demand by visitors, NPS considers it undesirable to close the parking lot during construction; NPS will attempt to maximize access and will not close the facility to the public, except when necessary to maintain construction scheduling. Construction activities that would require parking lot closure include relocation of the parking lot fill, and bridge construction. It should be noted that weekend construction work is not anticipated, and visitors usually will be able to access the parking lot during the weekend peak usage time.



MARGARET KETTUNEN ZEGART
118 HIGHLAND LANE
MILL VALLEY, CA 94941

January 28, 2007

2007 JAN 23 10 3 53

Brian O'Neill, Superintendent
Fort Mason, Building 201
San Francisco, CA 94123
Attn: Restoration at Big Lagoon

Steve Ortega, Environmental Protection Specialist
(415) 561-4841
GOGA_planning@nps.gov

**RE: Wetland and Creek Restoration at Big Lagoon Draft
Environment Impact State/Environmental Impact Report**

Dear Mr. O'Neill and Ortega

Wetland and Creek Restoration at Big Lagoon would initiate restoration of project area, 6.75 acres of land above Pacific Way and Bridge maintained by Marin County, bordering at flood risk Pelican Inn, the lower reach of Redwood Creek near Muir Beach, CA from where the creek passes underneath Highway 1, to its mouth at the Pacific Ocean approximately 2,800 feet downstream.

Major components of the project include:

- Reconfiguring the Muir Beach parking lot
- Replacing the Pacific Way Bridge and modifying Pacific Way
- Recreational and informational enrichment for visitors
- Restoring natural function of the creek enabling high flows of sediment to the Ocean
- Rehabilitating / enhancing habitat for California Red legged front, Coho Salmon and trout

ES-8 should add goal Acknowledge the cultural values and history of Portugese, agricultural ranch life and mid 20th century tavern enrichments.

Q-1

Relocating general parking and lot away from the creek by choosing Alternative C
Alternative B, the "preferred alternative"

a. **does not substantially mitigate the hydraulic obstruction – only moves upward 175 car 90 foot lower parking lot area with stacking vehicles continuing problem**

Q-2

b. **Insufficient mitigation for natural creek flow sustainable future successes.** As sea levels rise, wet meadows and marine / tidal systems will creep upward.

Q-3

c. **inconsistent with Draft Marin County Wide Plan**

1. does not correct unacceptable level of service on Shoreline Highway 1. (p. CWP2.0-6) 4.23-2

Q-4

2. measures to reduce traffic flows by an increase for transit service with MCWP (i.e. 4.2-1).

Alternative C provides parking site away from beach and community intersection

a. 175 parking spaces to minimum 118 Cars at Alder Grove location

b. 14 Disabled-Accessible Parking Spaces and provide transit drop off spaces to accommodate local users at assigned times

Q-5

c. Opportunity to modify / lengthne 14 individual vehicle drop off area to include transit vehicle drop off space;

- d. signed and enforced 15 MINUTE PARKING 10 AM – DUSK. This would add
 - 1. Mitigation to allow local users of the beach early adjacent Beach parking in this area prior to GGNRA visitors’ bus drop off consistent with park use
 - 2. Mitigation for sufficient transit plan spaces would focus on and benefit increased transit schedule to Muir Woods Route and GGNRA West Marin destinations for visitors from larger Bay Area and national and international places. Increase frequency of bus / shuttle from SF and Marin Co staging area.
 - 3. Would eliminate individual car stacking congestion approaching beach
- e. would be consistent with a *DMCWP* p. 2.0-15 Air 4.3-4 to minimize by buffer any Carbon Monoxide Concentrations along sensitive habitat
- f. would be consistent with *DMCWP* p-2.0-17 4.5-1b “continuing to implement ... non-point pollution and run off pollution” into immediate Big Lagoon restoration area
- g would be consistent with *DMCWP* pp.2.0-28;29 by improved protection of Coastal areas from flooding / tsunami and Seiches measures by relocation of site
- h could facilitate less Shoreline Highway congestion at Pacific Way

Q-6

Q-7

Provide Sufficient; aesthetic Alternative BR4: 266-foot long bridge with highest road since BR 3 addresses 10 yr flood condition

1.(ES-18) This more costly alternative is preferred “since its substantially greater costs provide greater benefits.”

- a. eliminates 3” annual winter flooding and maximum access during increasing “very large storm events” (ES-20)
- b. realizes long term sustainable choice with known and forecasted climate changes – “anticipated water rise and better addresses the reality of sea level rise (up to a meter) and transgression of the marine environment into the valley and creek.
- c. length would better balance visual aesthetics of two lane road + multimodal access lanes.
- d. allow dramatic entrance design to beach – i.e. the pedestrian bridge at Redding, CA
- e. permit enhanced, enlarged and landscaped picnic area without parking lot “fumes”

Q-8

Recreational and Informational material for Visitors

- a. mitigate removal of tavern remnants by kiosk information ES-p. 11 *(see attached)
- b. provide connection of indigenous habitats but extends information about Muir Beach/Big Lagoon residents of this unique area ES-21 but should add
 - 1. Descriptive conjectured/probable maintenance by Native Americans and current GGNRA stewardship
 - 2..Residents cultural and agricultural activities; mid 70’s regional enrichments*

Q-9

Q-10

* earlier attached letters RE: Muir Beach History and incomplete historical/cultural
Thank you for choosing the broader and safer vision of these selected alternative choices.

Sincerely

Margaret Kettunen Zegart,

These responses are made from the *DEIR Executive Summary*, since I have not been able to secure a copy of the Draft Report and from concerns raised at scoping and informational meetings, and a Report from the San Francisco Bay Area Wetlands Restoration Program Design Review Group, 2/11/04

✓ Cc: Tim Haddad, Thaddad@co..marin.ca.usa

MARGARET KETTUNEN ZEGART
118 Highland Lane
Mill Valley, CA 94941

August 12, 2002

Golden Gate National Recreation Area
Planning & Technical Services
Steve Haller, Historian
Fort Mason, Building 201
San Francisco, CA 94123

RE: Muir Beach recent history

Dear Steve Haller:

I hope that the material sent regarding Muir Woods, photograph resources and information about Druid Artist Retreat has reached you.

For your information I am copying information that I included in my review of the *Draft Environmental Assessment Element of Lower Redwood Creek Interim Flood Reduction Medaszaures and Floodplain / Channel Restoration*.

✓ The gift of Muir Beach by George Wheelwright was inaccurate as written on p. 36. Also, I am not sure if you have this other general historical information, most information is directly from a paper written by Sarah Smiley, June 4, 1970 compiled from interviews of long time residents and by me, also, from other resources..

William Richardson's Rancho Sausalito boundaries were acquired February 11, 1838, a land grant of 19,572 acres. Portuguese were thrifty and hardworking on grazing and farming lands that they gradually acquired and then developed dairy farms at Sausalito Ranch, Franks Valley, at Muir Beach and Green Gulch. On December 12, 1918 Constantine Bello brought ranches K, M and T from Tamalpais Land and Water Company, becoming owner of all Muir Beach Golden Dairy. In 1919 Antonio Nunes Bello built near Big Beach a hotel which later burned down. In 1923 Ranch T was subdivided into small lots of Bello Beach. Clayton Bello financed building the tavern and Anthony Nune Belo built it and little cabins on Big Beach. Mr. Ponte hauled the lumber from Smith's Lumber Co. in San Francisco to the site. Albert Silva would come to Muir Beach and sell ice cream, soda water and root beer. At Bello's death in 1928, Joseph Weil and Louis Harris acquired ranch K and ranch T and formed the Muir Beach Company, developing a water supply, though muddy and of poor quality. The tavern had a large hall, kitchen, dining room with (hotel) rooms and one of the cabins was the office of James Weil who moved from New York around 1927..

In 1940 the name changed from Bello Beach to Muir Beach. During World War II there was a coast artillery installation on the overlook and Muir Beach homes were used to house military personnel. Al Santos was a Green Gulch test pilot. In 1945

In 1958 the Muir Beach Community Services District was formed and later, in 1963, the Miwok Corporation. This group formed, developed and marketed the Seascape area, subdividing the remainder of ranch T and began in 1961 the Muir Beach Water System. Local property owners were represented by the Muir Beach Homeowners Association which continues to represent the community in planning concerns with Marin County and other agencies, including dialogue with the GGNRA.

In 1945 George Wheelwright purchased the Green Gulch Farm including a lagoon area bordered by the creek opposite the present Pelican Inn where he created a pasture out of marsh by constructing drainage channels, levees and a dam and excavating a large channel along Redwood Creek. He created seasonal pools for salmonoids and maintained a creek water flow."

In 1945, also, Dr. John and Lucy Brien purchased the beach property and tavern from James Weil and Lucy Harris. In 1963 they sold this 15 acre Muir Beach property to a group of Mill Valley landscape architects and conservationists, including Hugh Call, Robert Greensfelder, Tom Grodner, Asa Hamamoto and Robert Royston.

These visionaries remodeled the tavern and tried to make it a successful recreational and cultural destination. By 1967 when "Buddha" held large parties, the summer/flower children gathered here. Concerts by significant groups, ie. Grateful Dead, Clover, or Quicksilver performed. Literary events were held and a restaurant served food.

In 1967, Wheelwright donated the pasture to the State Park System which built a parking lot in its current location at the beach.

In 1968 Dino and Carlo, from San Francisco's North Beach leased the tavern and loud music and nudity and beach litter became a problem.

In 1969 there was a condemnation suit to add the 15 acre beach property to the State Park system. An anonymous woman donated \$125,000 to aid in the purchase. Owners Greensfelder, Hamamoto, Royston, etc. agreed to sell the property for \$250,000. However, the State would pay only \$200,000, so, by a State condemnation court settlement, the figure of \$247,000 was the purchase price reported in the *Independent Journal*, April 16, 1969.

Residents of the Muir Beach community anticipated that the GGNRA would create a recreational area, utilizing existing horse stables and other amenities. At one time a gas station was at the corner of Highway 1 and Pacific Way., but through the Muir Woods Homeowners Association efforts, commercial business have been discouraged.

In 1979 the only tourist service business, the Pelican Inn, opened and it provides seven guest rooms and a pub style restaurant.

In July 1977 the Green Gulch Ranch, original Wheelwright parcel 200-020-09, went to Zen ownership again, by Deed 3178140-77, to the San Francisco Zen Center.

Sincerely,

Margaret Kettunen Zegart 415 383-2771

Margaret Kettunen Zegart

MARGARET KETTUNEN ZEGART
118 Highland Lane
Mill Valley, CA 94941

August 9, 2002

Golden Gate National Recreation Area
Planning & Technical Services
ATT: Jonathan Gervais, Environmental Compliance Officer
Fort Mason, Building 201
San Francisco, CA 94123

RE: Draft Environmental Assessment, Lower Redwood Creek Interim
Flood Reduction Measures and Floodplain / Channel Restoration.

Dear Planners:

By my general reading of this document, these items need commentary or corrections to be helpful or more accurate. Thank you so much for attending to the welfare of Redwood Creek and to begin initiating solutions for this, and estuary / lagoon / beach restoration, and for attention to the needs of the Muir Beach community.

p. 4. 1.01 A brief Introduction and Background

Pacific Way parallel information to the Banducci site description is not included here, although document moves to 2.0 Purpose and Need of Pacific Way

Most helpful would be a general time table for phases in flood and estuary and beach restoration to the Pacific Way site [beyond fall 2002]. A context of phases for **this minimal work to correct flooding at 3.5 years flood level at Pacific Way** is important to adequately consider the value / time spent and to determine other alternatives, as more useful. The lower Redwood Creek Restoration, Big Lagoon, Muir Beach community's infrastructure needs and Redwood Creek's health regarding sewerage and septic tank seepage of effluent and the increasing water draw upon the upstream well - all that are affecting the creek are work projects that should also be included in the time table and prioritized in the phases of repair and maintenance recommendations for riparian habit, creek channelization and stream flow and restoration to the lagoon, natural estuary and ocean beach.

p.17 Environmentally Preferred Alternative

The transfer of resources from Pacific Way / Big lagoon to acquire other GGNRA property and to postpone an alternative to correct A flood plain [and community access] to a [new] traditional 100 year flooding event goal is important to discuss, since the purpose and need (point 1., p. 7) is not met. This document becomes a focused EIR on a minimal first phase.

p.20 Cultural Resources Analyses Although perhaps considered minor, because of high visibility and tourist interest, I believe kiosk signing and building site locations illustrated by photographs and art should be a part of the restoration as well as the explanation of historic uses and ecology of the land around this waterway. [Some wonderful contemporary watercolors of Frank's Valley and this area have been painted by long time Muir Beach artist resident, Larry Yamamoto among others and writings by Alan Watts and others in the Druid's Artist retreat community would also be of high interest.

p.24 Water Use.

An adequate assessment of water use and projected increase is needed. Frequent home expansion in this prized real estate area. and increased water use occurs. [i.e., A home at 6 Starbuck Drive will gain 1,737 square feet to a 4,301 square foot home]. Although there are a limited number of new building sites, currently limited irrigated parcels and public landscaping areas, these should be using tertiary treated effluent in the future.

This section also should be expanded to discuss interrelationship between water use and options of tertiary treatment and the failing Muir Beach community sewer system. [i.e. "Chlorine and Coho in Muir Beach", *San Francisco Chronicle*, 7/2/02, describes an inadequate purification system that some say threatens fish A Rube Goldberg contraption to contain spills was temporarily installed, but its replacement was hardly better, the article continues, and the reported and assessed spill was considered serious by Mia Monroe. Rather than to "upgrade" or replace deteriorating septic systems, for the long term, a satisfactory and safe system sewerage system should be designed that should be included in the phase schedule of future projects with the GGNRA, Marin County and residents. Storm water quality protection is needed for persons, stream and land wildlife. A contemporary use of a natural, reconstructed marsh effluent treatment process seems ideal.

p. 26 mitigation seems "to beg / gloss over" an important future phase point and perhaps should be re-worded.

p. 36 Cultural/Historic Resources is incomplete or inaccurate.

Correctly state the condemnation acquisition process by the State – not a gift - of the beach property by George Wheelwright.

Because of this area's high interest I would hope you would add some of this information, most information is directly from a paper written by Sarah Smiley, June 4, 1970 compiled from interviews of long time residents and by me, also, from other resources..

William Richardson's Rancho Sausalito boundaries were acquired February 11, 1838, a land grant of 19,572 acres. Portuguese were thrifty and hardworking on grazing and farming lands that they gradually acquired and then developed dairy farms at Sausalito Ranch, Franks Valley, at Muir Beach and Green Gulch. On December 12, 1918 Constantine Bello brought ranches K, M and T from Tamalpais Land and Water Company, becoming owner of all Muir Beach Golden Dairy. In 1919 Antonio Nunes Bello built near Big Beach a hotel which later burned down. In 1923 Ranch T was subdivided into small lots of Bello Beach. Clayton Bello financed

building the tavern and Anthony Nune Belo built it and little cabins on Big Beach. Mr. Ponte hauled the lumber from Smith's Lumber Co. in San Francisco to the site. Albert Silva would come to Muir Beach and sell ice cream, soda water and root beer. At Bello's death in 1928, Joseph Weil and Louis Harris acquired ranch K and ranch T and formed the Muir Beach Company, developing a water supply, though muddy and of poor quality.

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Beach Water System. Local property owners were represented by the Muir Beach Homeowners Association which continues to represent the community in planning concerns with Marin County and other agencies, including dialogue with the GGNRA.

p. 36 [correction of third paragraph]

"In 1945 George Wheelwright purchased the Green Gulch Farm ... including a lagoon area bordered by the creek opposite the present Pelican Inn. Muir Beach where he created a pasture out of marsh by constructing drainage channels, levees and a dam and excavating a large channel along Redwood Creek. He created seasonal pools for salmonoids and maintained a creek water flow."

In 1945, also, Dr. John and Lucy" Brien purchased the beach property and tavern from James Weil and Lucy Harris. In 1963 they sold this 15 acre Muir Beach property to a group of Mill Valley landscape architects and conservationists, including Hugh Call, Robert Greensfelder, Tom Grodner, Asa Hamamoto and Robert Royston.

These visionaries remodeled the tavern and tried to make it a successful recreational and cultural destination. By 1967 when "Buddha" held large parties, the summer/flower children gathered here. Concerts by significant groups, ie. Grateful Dead, Clover, or Quicksilver performed. Literary events were held and a restaurant served food.

In 1968 Dino and Carlo, from San Francisco's North Beach leased the tavern and loud music and nudity and beach litter became a problem.

In 1969 there was a condemnation suit to add the 15 acre beach property to the State Park system. An anonymous woman donated \$125,000 to aid in the purchase. Owners Greensfelder, Hamamoto, Royston, etc. agreed to sell the property for \$250,000. However, the State would pay only \$200,000, so, by a State condemnation court settlement, the figure of \$247,000 was the purchase price reported in the Independent Journal, April 16, 1969.

"... In 1967, Wheelwright donated the pasture the Muir Beach area to the State Park System which built a parking lot in the its current location at the beach. ..."

In 1969, through a condemnation suit, the California State Parks purchased the Muir Beach property. Residents of the Muir Beach community anticipated that the GGNRA would create a recreational area, utilizing existing horse stables and other amenities.

At one time a gas station was at the corner of Highway 1 and Pacific Way. Now the only tourist service business is the Pelican Inn, which opened in 1979 and provides 7 guest rooms and a pub style restaurant.

The Green Gulch Ranch, original Wheelwright parcel 200-020-09, went to Zen ownership; In July, 1977, again, by Deed 3178140-77, to the San Francisco Zen Center.

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Human-cause factors affecting flow velocity, sedimentation and flooding include: ...

° height of the barrier NPS Parking Lot

° failure to maintain the creek channel flushing action flow

° insufficient culvert size to accommodate winter storm flow and tidal surges and channel upstream width

p. 20 PREFERRED RESTORATION APPROACH

The value of a phase list by priorities and timetable in the introduction of this document would help this section of the EIR.

Floodplain Inundation Details for Pacific Way area [as done on page 27 for the Flower Field] should be provided here.

Thank you for the opportunity to comment on this document.

Sincerely,



Margaret Kettunen Zegart
KETTZ @ AOL.COM

Letter Q: Margaret Kettunen Zegart (January 28, 2007)

Response to Comment Q-1

Although the goal is part of the larger mission of NPS, it is not a goal of the project. GGNRA recently conducted an evaluation of southern Marin County dairy ranches as part of a determination of eligibility for listing on the NRHP (Weeks and McKee 2006). This work focused on the Portuguese dairy ranching era because of its significance in the history of Sausalito. The study determined that the Golden Gate Dairy is eligible for listing, and, as of June 2007, GGNRA was currently waiting for concurrence from the SHPO on this determination. The resources at the project site do not have sufficient integrity relating to significant historical eras to be considered for listing. However, the likely listing of the Golden Gate Dairy represents an opportunity for preserving and communicating the area's agricultural history. An equestrian plan underway by GGNRA will address cultural resource values and interpretation goals for the Golden Gate Dairy.

Regarding the mid-20th century tavern remnants, project plans have been changed such that the only portion to be removed would be the retaining wall in the wetland, which has adversely affected the function of the wetland and has facilitated the growth of invasive species. Note that the tavern remnants do not have sufficient integrity to be considered for listing in the NRHP.

Response to Comment Q-2

Hydraulic modeling was employed to determine the effects of the removal of parking lot fill on improving conveyance and sediment transport capacity (PWA et al. 2004). A sensitivity analysis was performed on the existing conditions model by testing the impacts of removing a portion of existing fill. The eastern end of the parking lot and picnic area was moved westward 30, 60, 90, 120, and 300 feet. Each of these five parking lot configurations was tested in the hydraulic model under the 5-year recurrence interval (Q5) and 50-year recurrence interval (Q50) conditions. Immediately upstream of the parking lot under Q5 conditions, the hydraulic model showed that water levels dropped by 0.5 feet, 0.7 feet, and 0.9 feet at setback distances of 30, 90, and 300 feet, respectively. A similar hydraulic pattern was apparent under Q50 conditions. The 90-foot parking lot setback was selected as an appropriate minimum distance, given the diminishing improvement in water levels with increasing setback distance. The 300-foot setback would roughly correspond with the conditions under Public Access Alternative C.

Based on hydraulic models, Public Access Alternative B3 would have substantially removed the hydraulic obstruction of the parking lot because it removed more than the minimum area necessary. However, NPS agrees that Public Access Alternative B4 would more fully remove the hydraulic obstruction

and has selected B4 as the new preferred alternative. Finally, while the new preferred Public Access Alternative B4 would, in fact, help relieve vehicle stacking on Pacific Way relative to existing conditions, under Public Access Alternative C, vehicle stacking would be relocated to Hwy 1, which represents a greater traffic safety hazard and would affect a larger number of drivers (i.e., all drivers on Hwy 1, not just those accessing Muir Beach and the surrounding community).

Response to Comment Q-3

Please review MR-3. The new preferred Public Access Alternative B4 will allow sufficient area for natural variation under both current and future conditions.

Response to Comment Q-4

Addressing the existing LOS on Hwy 1 and public transit issues is beyond the scope of the project. As such, neither Public Access Alternative B3 nor the new preferred Public Access Alternative B4 are inconsistent with the *Marin Countywide Plan* inasmuch as these policies are not relevant to the project, nor would the project lead to a degradation of conditions with respect to these policies. Also, please note that the commenter is referring to the draft *Marin Countywide Plan*; the plan was adopted on November 6, 2007. Both Alternative B3 and the new Preferred Public Access Alternative B4 remain consistent with the plan as adopted.

Response to Comments Q-5, Q-6, and Q-7

The preference for Public Access Alternative C is noted, as is the request for the provision of 15-minute parking in the smaller lot at the beach as part of that alternative. Although the provision of such 15-minute parking has merit, NPS has diligently conducted environmental review of the project, in part to determine the preferred alternatives amid the list of feasible alternatives. There are several reasons that NPS has not selected Public Access Alternative C as the preferred public access alternative, including: avoiding additional traffic impacts on Hwy 1, accessibility related to having a lot close to the beach, avoiding impacts on existing habitat at the site of Public Access Alternative C, and avoiding increased traffic issues overall by maintaining the current parking lot capacity.

It is noted that the commenter believes that Public Access Alternative C is more consistent with the draft *Marin Countywide Plan*; as stated above, the preferred alternative is not inconsistent with the *Marin Countywide Plan*. Also, as above, please note that the *Marin Countywide Plan* was adopted on November 6, 2007. The preferred alternative remains consistent with the plan as adopted.

Response to Comment Q-8

The preference for Bridge Alternative BR4 is noted. Please note that the preferred alternative has been changed to BR4. Please also refer to MR-1.

Response to Comment Q-9

NPS evaluated the remnants of the tavern and concluded they do not have sufficient integrity to warrant protection as a historic resource. In response to public interest, NPS will change proposed actions slightly and will leave the tavern's chimney in place. The buried retaining wall will be removed because it affects the functioning of the wetland.

Response to Comment Q-10

Comment noted. NPS appreciates this input regarding the contents of interpretive materials and will consider this comment as project implementation progresses. Please note that NPS plans to incorporate an ethnographic approach into the revegetation plan that will be prepared for the site. This will rely on an understanding of Traditional Ecological Uses of vegetation and will draw upon guidance from the Federated Indians of Graton Rancheria and experts on Native American ecology.