R

Haddad, Timothy

From: KETTZ@aol.com
Sent: Monday, February 26, 2007 8:57 AM
To: Haddad, Timothy; GOGA_planning@nps.gov
Subject: WETLAND AND CREEK RESTORATION AT BIG LAGOON, MUIR BEACH, MARIN COUNTY, CA

MARGARET KETTUNEN ZEGART
118 Highland Lane
Mill Valley, CA 94941

February 26, 2007
Marin County Planning Commission
Tim Haddad, Environmental Coordinator
Marin County Development Agency
1301 Civic Center Drive, Room 308
San Rafael, CA 94941

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

Dear Mr. Haddad and Planning Commissioners:

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 Portuguese, agricultural ranch life and mid 20th century tavern enrichments.

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 by moving upward the primarily 90 foot lower parking lot area
b. seems an insufficient mitigation for natural creek flow sustainable future successes. As sea levels rise, wet meadows and marine / tidal systems will creep upward
c. inconsistent with *Draft Marin County Wide Plan* since does not correct unacceptable level of service on Shoreline Highway 1. (p. *CWP*2.0-6) 4.23-2
d. inconsistent with *MCWP* (i.e. 4.2-1 measures to reduce traffic flows by an increase for transit service)
Alternative C instead would reduce
a. 175 parking spaces to minimum 118 Cars at Alder Grove location plus 14 Disabled- Accessible Parking Spaces and provide individual vehicle drop off spaces
b. should also modify 14 individual vehicle drop off area to include transit vehicle drop off space; signed NO 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 of 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 to change 94% visitors who arrive by private vehicle
c. would be consistent with a *DMCWP* p. 2.0-15 Air 4.3-4 to minimize by buffer any Carbon Monoxide Concentrations

2/26/2007

along sensitive habitat
d. 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
e. 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 parking site
f. removal of lower parking area could be turned into deep pond for enhancing habitat for salmonid outmigration. (Laura Collins)* R-1
g. would be closer to Highway 1 and by well designed staging space, reduce adverse congestion of 175 car parking lot by lagoon.

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

a. (Executive Summary p-18) This more costly alternative is preferred " since its substantially greater costs provide greater benefits." For maximum access during increasing "very large storm events" (ES-20)
b. Long term sustainable choice because of climate changes… "anticipated water rise
and better addresses the reality of seal level rise (up to a meter) and transgression of the marine environment into the valley and creek."
c. lack of multi-modal lanes on bridge and in Lagoon project inconsistent with Marin County goals, DEIR R-2

Preferred Alternative 2 could phase in future benefits of 3 and 4 restoration modes

ES –21… "enhanced protection of archaeological sites.to original inhabitants of these lands. Residents from the nineteenth century to the present - agricultural ranchers, and cultural diversities of the Portuguese community, Tavern era and Pelican Inn hostelry and adjacent Zen community contribute to the continuing historical enrichment of the Big Lagoon area. (*Attachments)*

Table ES – 1a Restoration Alternatives (page numbers would help in this section)
Watershed Processes
WP-R9 Ability to accommodate sedimentation loads…(Peter Baye) Modify alternative 3 R-3
Proposes sacrificing some marsh space for an expanded lagoon basin letting natural system evolve from there although uncomfortable from
engineering standpoint*

Water Quality Impacts
WQR-11 Salinity changes in Lagoon
Negilible negligible negligible beneficial not really "brackish" as described R-4
because storm surges recharged
salts from mouth occur when plants
dormant and relatively salt insensitive in winter and water flows or surge events would wash out most residual salts.*

ES- 4.3.3 Cultural Resources Impacts
CR- R-7 Removal of tavern foundation Incorporate historical ethnic,
m a m a m a m a agricultural and cultural events and personal narratives in educational visitor material

ES 4.3.4.1 Recreational and Visitor Experience no non-motorized multimodal bike
No bicycle ways provided and this lack lanes provided on bridge and trails
Inconsistent with MCWP_ and present goals along the connecting network and
to parking lot -not along dune strands
(4) significant adverse impacts

ES 4.3.4-4 Energy, Public Services …..
PS F—6 Increased GGNRA transit system Necessary component for reduction
and shuttle services in congestion and accompanying
and adverse CO2 / toxic emissions
and pleasing visitor experience

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,
*Report from the San Francisco Bay Area Wetlands
Restoration Program Design Review Group, 2/11/04

2/26/2007

Sincerely,

Margaret Kettunen Zegart

COPY
Brian O'Neill, Superintendent

Steve Ortega, Environmental Protection Specialist

2/26/2007

Letter R: Margaret Kettunen Zegart (February 26, 2007)

Many of the comments in Letter R are similar or identical to those presented in Letter Q. Only new or different comments have been responded to in this letter.

Response to Comment R-1

This suggestion is appreciated. However, the project intends to restore and enhance natural hydrological processes at the site, and there is no evidence that such a pond may have existed in this area. Please note that when the parking lot is removed, the area will function as a winter floodplain, which still will provide valuable habitat for salmonids.

Response to Comment R-2

Please note that the project does propose a separate, multimodal bike/pedestrian facility on the bridge, as referenced in this comment. As such, it is consistent with the *Marin Countywide Plan*.

Response to Comment R-3

An expanded lagoon has been considered as part of Restoration Alternatives 3 and 4.

Response to Comment R-4

The tidal lagoon shifts seasonally from freshwater to brackish water. In the winter months when the beach berm is open and tidal inflows occur, the water in the lagoon can be stratified with saline water at the bottom and fresh water at the top. When the beach berm closes and there are still low freshwater inflows from Redwood Creek, the fresh water and saline water can be well-mixed and brackish. Late in the fall, when freshwater inflows are very low and the berm is still closed, the water can become stratified, with the saline water at the bottom. Although the quantity of fresh and saline water varies throughout the year, saline water is always present in the lagoon. Salinity at different strata of the tidal lagoon was measured monthly during the 1992–1993 analyses for the project (PWA 1994).

S

Haddad, Timothy

From: KETTZ@aol.com
Sent: Tuesday, March 06, 2007 11:53 PM
To: GOGAplanning@nps.gov; Haddad, Timothy
Subject: DEIR Comments re: Access at Big Lagoon

MARGARET KETTUNEN ZEGART
118 Highland Lane
Mill Valley, CA 94941

March 6, 2007
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 Mr. Ortega:

Wetland and Creek Restoration at Big Lagoon's Draft does not include the multi modal public Access as summarized,

p. ES-12

Bicycle access from Highway 101 and Bicycle Access to the Beach should be included in as a multi modal component of this plan. S-1

Secured bicycle storage in any parking area should be included.
Implementing bicycle transport on shuttle and transit programs should be included. S-2

Prohibition of equestrian and motorized off road vehicles should be discussed and policy implemented for the Beach and trail/path access to the Big Lagoon and Creek Area. S-3

Handicapped access and accommodation for mobility access and information should be included, S-4

p. ES-17

Description of connecting trails, Dias Ridge's and Coastal Trail's recontouring to include multi-modal access should be noted, although their program's design"would be the subject of a subsequent NEPA analysis." The information developed should be included in the future publications and public information articles. The Coastal Conservancy, *A Wheelchair Rider's Guide*, page 16 and 17 should add this information "From Muir Beach to Muir Woods to Stinson Beach." S-5

Sincerely,

Margaret Kettunen Zegart
Cc: Tim Haddad, Marin County Environmental Director

3/7/2007

Letter S: Margaret Kettunen Zegart (March 6, 2007)

Response to Comment S-1

The proposed path would be bicycle-accessible, with bicyclists having the option of using Pacific Way to reach the parking lot.

Response to Comment S-2

Secure bicycle storage features such as bike racks will be incorporated into designs for visitors' convenience and security. However, please note that actions related to a shuttle are not a component of this project and would need to be addressed by operators of a shuttle system.

Response to Comment S-3

The trails in the project area will be multiuse to facilitate full visitor access to and full recreational opportunities on the site. Equestrians will be permitted to use the trails in the project area. Motorized vehicles generally would not be permitted, and the only off-road vehicles that would be permitted would be bicycles or those used for ADA accessibility.

Response to Comment S-4

All trails proposed as part of the project will be ADA-compliant. This pertains to the new path from Hwy 1 to the parking lot, including the portion that will be attached to the new bridge.

Response to Comment S-5

This suggestion is appreciated. It is outside the scope of this project to plan details of the Dias Ridge or Coastal Trail recontouring projects. Please note, however, that the trails referred to cannot meet requirements for outdoor ADA accessibility because of their terrain and steep slopes.

T

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Correspondence Information

Status: New	**Park Correspondence Log:**
Date Sent: 03/06/2007	**Date Received:** 03/06/2007
Number of Signatures: 1	**Form Letter:** No
Contains Request(s): No	**Type:** Web Form
Notes:	

The following are my comments relating to the draft EIS/EIR dated Dec. 2006.

Two main issues I have are

a. The alternatives 3 and 4 do not have significant areas of emergent wetland "by design." The result is that the risk rankings are more negative for these alternatives than they might be if the designs included some permanent open water useful for many species. I recommend that these alternatives be adjusted to include some permanent emergent wetland rather than the large riparian forest. This could adjust the relative value of these alternatives. T-1

b. Alternative 4 is the only alternative which will, after 50 years, still have any significant open water, ala Big Lagoon! I recommend that the preferred alternative be adjusted to include some pond area which will provide open water all year. This might be located just south of the access road which parallels Highway 1. If the pond is relatively small, the likelihood of significant salmonids entrapment would be mitigated. T-2

Thanks to all of the contributors for a well done report!

The following are additional more detailed comments.

1. Cover picture and page ES-2: shows a real big lagoon. This is misleading since the least likely alternative (4) is the only one which will actually provide a Big Lagoon. T-3

2. The source of TNC hot spots should be identified. T-4

3. Page ES-4. Why only special status species, why not all native species? T-5

4. Page ES-4. Given that there is a new drainage across Pacific Way near the Pelican Inn, which seems to have, at least this year so far, alleviated the flooding issue, should there be a revision to this document and perhaps a reduction of emphasis on flooding versus habitat improvement. T-6

5. P30: Only endangered and threatened species are mentioned in summary, but a variety of waterfowl and amphibians and fish are also affected and should be generally mentioned. In other words, more common species should also be a driver in restoration since they may be declining with degraded habitat. T-7

6. p35: Native fish, including salmonids, eat a lot of mosquitos too! T-8

7. p35: Due to the loss of access to the marsh area for birding, it would be nice to have some boardwalk into the marsh to compensate and to locate the bird species present each season. We have had regular bird studies of the marsh via the levee road for at least 12 years. T-9

8. p41. The likelihood of self-sustaining ecosystem is not clear based on the modeling. Given the great uncertainties of the models, and of the probability of a self-sustaining system, it may be that this alternative does T-10

not really give the best alternative.

9. Emergent wetland is greatly reduced in Alternatives 1-3 from existing situation. Only Alternative 4 provides much emergent wetland. This is important habitat for many species, and I would think there might be quite a reduction of such things as Black Phoebes, Bobcat and Coyote hunting areas, seasonal ponds for many duck species and more. Can't the preferred alternative be adjusted to reduce the overall Woodland/Scrub to include more emergent wetland? Also the designs of the alternatives therefore bias the Table ES-1a elements VEG-R4 and VEG-R5. This could be improved by design. This also seems inconsistent with WLD-R5. This is particularly important habitat for the nesting Virginia Rails (and hopefully other rails given time). Page 5-20 reiterates the idea that this loss of emergent wetland is "unavoidable." Why can't it be eliminated by design? T-11

10. Alternative 4 is the only alternative that really provides open water year round. The documented decline (via Audubon Christmas count data and other) of waterfowl in the area since 1995 had reduced species diversity substantially. Isn't there someway to adjust the preferred alternative so that there will be open water for 50 years that will not be subject to massive siltation? Perhaps a pond a bit off to one side of the major flood path such as up into the lower Green Gulch horse pasture area. The only real refuge for dabbling ducks right now is the pond on the Middle Green Gulch trial, which is also rather seasonal. Without some open water (long term), the restoration isn't really even close to the 1853 maps. Given that Alternative 3 was not really modeled per se (it was an interpolation of 2 and 4 – page 4-14), perhaps an open water area could still be designed and sustainable? T-12

11. Impact Summary Table ES-1a: Why do alternatives 3 and 4 result in minor adverse effects of reduced flows or dry periods? Given the large uncertainties in the sediment flow modeling, how to we know this accurately? T-13

12. Page ES-25. But exactly how was the determination that Alternative 1 was the best concluded, environmentally? How was the reduction of flood protection, loss of open water and emergent vegetation and other factors weighed against truck traffic and air emissions issues? Also, have all other fill haulage alternatives been exhausted, and where is this documented? This conclusion affects everything and I haven't yet found the details (presumably in the details of the value analysis?). T-14

13. Page 3-16. The assumption of a 0.7 ft sea-level rise by 2060 may be low based on new information. I suggest the modeling be updated for more to consider adverse effects of inundation of the project particularly in severe storm conditions (effects on wildlife, etc., for the various alternatives). T-15

14. Page 5-10. All but the preferred alternative have negative effects on CRLF, I guess because of increased fish predation? But if we have a pond or two, as I suggest above, couldn't we improve their situation? Why no have the wetland off the present GG access road have pond (like it often does seasonally) which is above the floodplain a bit to reduce the chances of it retaining too many salmonids? Again, seems like a bias toward alternative 2 which could be corrected easily by design. T-16

End of comments.

Letter T: David M. MacKenzie (March 6, 2007)

Response to Comment T-1

It would be possible to modify the lagoon alternatives to include more emergent wetland. In fact, the long-term development of emergent wetland in the lagoon alternatives was one of their attributes. However, the lagoon alternatives were not selected because of a combination of factors; added emergent wetlands in those alternatives would not alter that evaluation. The enormous quantities of soil that would have to be excavated and hauled for the lagoon alternatives—and the likely refilling of the lagoons with sediment—was a large factor in screening them out from the preferred alternative.

Response to Comment T-2

Under the preferred alternative, areas of open water would continue to exist along the creek channel, in backwater channels, and within the backbeach tidal lagoon. In addition, during the wet season, it is anticipated that the site will continue to exhibit periods of extensive inundation and seasonal ponding, particularly within the emergent wetland areas (please refer to MR-2). Although more extensive open water areas were considered in Restoration Alternatives 3 and 4, the additional volume of excavation was determined to be prohibitive.

Response to Comment T-3

The Draft EIS/EIR cover photo shows an existing winter condition at the site, with the intermittent tidal lagoon in the foreground and ponding behind the levee road in the center of the photo (the Green Gulch pasture). Although the preferred alternative does not propose to excavate a large lagoon in the pasture area, the area still will be subject to inundation similar to that shown in the photo. The primary difference between the photo and the preferred alternative is that there will be more tree cover in the pasture area. The cover of the Final EIS/EIR has been revised to show the view north from the beach, standing near the tidal lagoon. Post-project, this view would remain unchanged with the exception of enhanced vegetation.

Response to Comment T-4

The Nature Conservancy's 25 global biodiversity "hot spots" were identified in:

Stein, B. A., L. S. Kutner, and J. S. Adams, eds. 2000. *Precious Heritage: The Status of Biodiversity in the United States*. Oxford: Oxford University Press.

Response to Comment T-5

All the federally and state-listed special-status aquatic species at the site have experienced substantial impacts on their habitats over recent decades. NPS Management Policy 4.4.2.3 states, "NPS will survey for, protect and strive to recover all species native to national park system units that are listed under the Endangered Species Act." As such, actions to provide habitat for special-status species drive specific elements of project design, and that is why this is listed as a project goal.

As for native species, NPS Management Policy 4.4.2 states, "Whenever possible, natural processes will be relied upon to maintain native plant and animal species and influence natural fluctuations in populations of these species." The project would enhance habitat for many native species that are not listed under ESA or CESA, as discussed in Impacts WLD-R5, WLD-R6, and WLD-R18. Additionally, floodplain, wetland, and riparian functioning would be improved to ensure a higher quality of breeding and foraging habitat for native species over the long term.

Response to Comment T-6

The new drainage on Pacific Way does not permanently solve the flooding issue at this access point. The new drainage helps drain water off the road, but it does not reduce flooding on the road during larger storm events. The uncontrolled flows during such events represent a substantial flooding problem that impairs vehicle access. As such, the conditions are not sustainable and need to be addressed.

Response to Comment T-7

Common wildlife species, such as lizards, garter snakes, sparrows, blackbirds, black-tailed deer, coyote, squirrels, perch, and sculpin, are discussed in Chapter 3, *Affected Environment*, section 3.2.2 *Wildlife and Wildlife Habitat*. Impacts on common species of wildlife are discussed under Impact WLD-R18.

Habitat requirements for listed species, according to ESA and CESA, are presumed to be protective of more than those listed species. Thus, when water quality and instream habitat are improved for coho salmon, for example, other species (vegetation, insects, other salmonids, and birds) benefit from the improved habitat as well. Although the goal of the proposed project is focused on listed species, the project is anticipated to benefit all of the native species that use the habitat types that will be available following restoration.

Response to Comment T-8

Comment noted.

Response to Comment T-9

Comment noted. NPS will consider the incorporation of bird blinds and boardwalks into the marsh as project design continues.

Response to Comment T-10

The project design and environmental analysis has used valid scientific approaches and the best available information to predict future conditions at the site. Although uncertainty regarding future conditions is unavoidable, the project has been designed to create self-sustaining habitat to the extent that the natural area will be mostly unconfined, and changes in the channel or in the habitat type will be allowed to occur with minimal interference by land managers. In terms of sustainability, this represents a substantial improvement over existing (confined) conditions.

Response to Comment T-11

The conceptual designs shown in this EIS/EIR have more extensive areas of emergent wetland than the conceptual designs in the Feasibility Analysis Report (PWA et al. 2004). New areas would be excavated, and the existing emergent wetland (the cattail area) in the southern portion of the pasture would not be removed as part of the project. It is possible that the cattail area may persist, although this is uncertain.

Designing the project to contain even more extensive areas of emergent wetland would be difficult. Relocation of the channel would result in a decrease in groundwater levels, which would have the tendency to dry out the site. Extensive excavation, therefore, would be necessary to bring the ground surface close enough to groundwater to allow emergent wetland to persist throughout the site. Such excavation would disturb the site extensively. Fill disposal and related haul trips also were a determining factor in selecting Restoration Alternative 2 as the preferred alternative over Restoration Alternatives 3 and 4, and they are generally regarded as undesirable.

Please also refer to MR-3, which discusses the potential shifts in habitat mosaics over time in response to sea level rise.

Response to Comment T-12

Please refer to Response to Comment T-2. In addition, although an off-channel orientation could reduce sedimentation, a pond would still be subject to siltation during routine storm events that result in standing water throughout much of the site. These larger events carry heavy sediment loads, and off-channel open water features would still fill in over time. Achieving conditions similar to those in the 1853 maps is not possible over the long term because of elevated sediment loads from the upper watershed, which have been semipermanently increased because of the legacy of land use in the watershed. Therefore, extensive excavation has been determined to be undesirable because of its relatively short-term benefits weighed against the impacts of fill hauling and extensive site disturbance.

Response to Comment T-13

Please refer to the discussion of Impact WP-R2. Evaporation losses would be increased as a result of the increased extent of open water habitat. In addition, excavation of the lagoon bottoms would lower groundwater levels in the immediate vicinity of the lagoons by several feet. This lowering of groundwater may decrease in association with anticipated sea level rise. Although water is expected always to be present in the lagoons during the dry season, the reduction in groundwater levels could result in reduced instream flows in Redwood Creek. This reduction would be caused by the thalweg elevation of the creek being higher than the groundwater level in the zone of influence of the lagoons. This also would be reflected in decreased flows downstream. Although such impacts are not certain, particularly with the range of estimates in sea level rise, they have been included because they are reasonably foreseeable.

Response to Comment T-14

Please refer to the discussion on pages 2-51 through 2-52. Section 101(b) of NEPA presents a variety of criteria for determination of the environmentally preferred alternative. In general, the criteria stress a balance between project benefits and the degree of adverse impacts. All alternatives would provide ecosystem benefits and would provide unique recreational opportunities. Restoration Alternatives 3 and 4 would have some benefits that would not be experienced under Restoration Alternative 2, such as increased diversity and more even representation of habitats at the site. However, it was determined that adverse effects related to the construction of these alternatives outweighed these benefits. Impacts of construction that would be more severe under Restoration Alternatives 3 and 4 include increases in air emissions; the extent of disturbance to habitat and biological resources (including populations of special-status species); the potential for disturbances to cultural resources; effects of noise and diminished aesthetics on visitors and residents during construction activities such as fill hauling,; and the duration of construction. The benefits of the alternatives also would have a tendency to be reduced over time, as ongoing sediment loads would cause the alternatives to trend gradually toward conditions that are similar

to those of Restoration Alternative 2. As such, it was the judgment of the EIS/EIR authors that Restoration Alternative 2 represented the environmentally superior alternative.

Response to Comment T-15

The latest IPCC (2007) predictions for future global sea level rise over the next 50 years are lower than those estimated in IPCC (2001). However, 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 to accommodate both sea level rise and severe storm conditions. The conclusions of this analysis indicate that water levels upstream of the footbridge would be increased by less than 1 foot 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 T-16

The goals of presenting Restoration Alternatives 3 and 4 were to evaluate the implications of trying to achieve conditions that were more similar to the historical (pre-1853) conditions at the site. Constructing additional ponds that are separate from the active channel does not fit within the overall approach of these alternatives, as such ponds were not present historically. If CRLF impacts had been the only issue that prevented these alternatives from being selected as the preferred alternative, NPS could have considered design modifications for CRLF. However, as stated earlier, there were many reasons that these alternatives were not selected as preferred, including increased costs and extent, intensity, and the duration of impacts.

U

Keep Private:	No
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Correspondence Information

Status: New	**Park Correspondence Log:**
Date Sent: 03/07/2007	**Date Received:** 03/07/2007
Number of Signatures: 1	**Form Letter:** No
Contains Request(s): No	**Type:** Web Form
Notes:	

We are very familiar with Big Lagoon. Years ago in the 1950's you could pitch lures into the lagoon for salmonids that would hold up waiting to go upstream.

While the Preferred Project Alternative 2 is financially the most beneficial to the Park, it is clearly not the most beneficial to the wildlife and the public. It will restore a very limited variety of environment, namely riparian. The creek remains channelized which will lead to deposition of sediments and corresponding flooding problems.

More valuable to the now limited salmonid populations is Project Alternative 3 with the two dredged lagoons interior to the parking area. Preserving the existing race of coho in Redwood Creek should be the primary goal of the ecological restoration. The exterior tidal lagoon should be increased to at least three or 4 times the suggested increase to help attain this goal. The increased open water overall would also benefit returning birdlife/waterfowl once present, but now missing from the landscape. U-1

It is unclear how the new creek channel adjacent to the dunes will be able to sustain this position without encroachment from the dunes forcing the creek channel towards the now existing channel. This may again lead again to a plugged section of the creek if the parking lot is not reduced further that the Preffered Alternative #2 describes. U-2

Retaining a 175 car parking lot B-3 Alternative may lead to the same problem that now exists from the present parking lot even though a small section of the lot would be removed. A more reliable solution to the eventual possible plugging of the creek flow would be to shrink the parking lot to the size of the lot in Alternative C or Alternative B-1 with 118 cars at Alder Grove. Safety concerns for the new roadway parking lot could be mitigated through appropriate signage. Appreciably reducing the size of the parking lot would add to the visitor experience. No matter what is done with the oversized 175 car lot it is still a giant eyesore and has always been out of place at this site. Flooding problems would be less likely to occur with the increased floodplain. U-3

Retaining the existing capacity of the parking lot does not encourage public transit authorities or the public to move forward to achieve alternate forms of transportation relative to visiting our parks. U-4

Alternative BR3, 150 ft. bridge with the raised road could be the most beneficial when combined with the Project Alternative 3 and a greatly reduced parking lot which would yield a larger floodplain where it is needed the most. U-5

I encourage the park to look again at the overall picture and move toward a more ecologically balance restoration. It would be worth the added expense. Thank you for the opportunity to comment.

John and Cela O'Connor

Letter U: John and Cela O. O'Connor (March 7, 2007)

Response to Comment U-1

The alternatives analyzed in the Draft EIS/EIR represent tradeoffs between different habitat values; the commenter is correct in that Restoration Alternative 2 is more heavily weighted toward riparian wetland habitat compared to Restoration Alternatives 3 and 4, which are weighted toward open water habitat. Selection of the preferred alternative considered many factors, including cost and benefits to wildlife and the public; Restoration Alternative 2 was determined to be the most beneficial overall. Please refer to Page 2-45 for a complete discussion of the decision-making process and factors considered in selecting the preferred alternative.

With respect to benefits to salmonids, the Draft EIS/EIR found that the various action alternatives were very similar. All alternatives would greatly reduce the potential for entrapment as a result of out-of-bank flows or channel avulsion. A similar extent of juvenile rearing habitat would be present under all alternatives. For Restoration Alternative 2, this would be primarily in the form of backwater channels, in-channel pools, cover provided by LWD, and floodplain habitat during high winter flows. Restoration Alternatives 3 and 4, in contrast, would provide this habitat in the form of the lagoons rather than through backwater channels and in-channel features.

Response to Comment U-2

Historically, the channel downstream of the pedestrian bridge was located in the easily erodable beach sand. During high flows, the channel could readily respond to migrating sand and other sediment by scouring vertically and laterally. It is suspected that over time, old channel armoring from near the parking lot was displaced downstream and prevented the lower channel from downcutting. This led to the condition in 2002 when the channel could not cut through the cohesive sediment and dense vegetation that established downstream of the footbridge. The proposed project seeks to prevent this condition from reoccurring by:

- relocating the channel beachward into the open sand,
- removing any buried riprap that could inhibit channel mobility, and
- rotating the parking lot.

These modifications are intended to increase the sustainability of the channel located in the back beach. However, since the 2005/2006 winter storms, the creek channel has eroded through the erosion-resistant material into underlying beach sand. This may make it unnecessary to relocate the channel.

In the restoration design, multiple changes will work in combination to allow the channel the mobility needed to address the existing condition (the parking lot

modification, the levee road removal, the riprap removal, and allowing the channel to cut through the sandy area downstream of the pedestrian bridge.

Response to Comment U-3

Since publication of the Draft EIS/EIR, NPS has chosen to select Public Access Alternative B4 as the preferred alternative to improve floodplain connectivity and sediment transport functions. Regarding the effects of the parking lot on flooding, hydraulic modeling was employed to determine the effects of 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 5 parking lot configurations was tested in the hydraulic model under the Q5 and Q50 conditions. Immediately upstream of the parking lot under Q5 conditions, the hydraulic model showed that water levels dropped by 0.5 ft, 0.7 ft, and 0.9 ft at setback distances of 30, 90, and 300 feet, respectively. A similar hydraulic pattern was apparent under Q50 conditions. The 350-foot parking lot setback under Public Access Alternative B4 was selected as an appropriate minimum parking lot setback distance, given the improvement in water levels with increasing setback distance.

The commenter also brings up other issues related to the size and location of the parking lot, such as safety concerns, aesthetics, and visitor experience. The Final EIS/EIR determined that relocation of the parking lot to the Alder Grove under Public Access Alternative C would have substantial safety issues for bicyclists, pedestrians, and equestrians that could not be fully mitigated through signage. Regarding aesthetics, the reconfigured parking lot under Public Access Alternative B4 is anticipated to be an improvement over existing conditions, as it would have less of a protrusion into the landscape. Views also would be improved through installation of planting bays between parking rows. Finally, regarding visitor experience, the Final EIS/EIR concluded that reduced parking lot capacity would adversely affect visitor experience for those visitors having difficulty finding parking; thus, the proposed alternative would maintain the current number of parking spaces.

Overall, Public Access Alternative B4 was determined to be the best option to balance multiple project objectives while avoiding or minimizing environmental impacts.

Response to Comment U-4

NPS agrees that reducing the parking lot capacity will not encourage the use of alternative transportation. However, if alternative transportation does not exist and the parking lot is reduced, adverse traffic impacts on Pacific Way and Hwy 1 will occur. This project seeks to coordinate with regional transportation planning, but planning means for alternative transportation is outside the scope of this

project. Nonetheless, NPS will not preclude the possibility of reducing the parking lot in the future, if conditions change.

Response to Comment U-5

The preference for Bridge Alternative BR3 and Restoration Alternative 3 is noted. Thank you for your participation in the environmental review process.

V

Haddad, Timothy

From: Walter [Postle@wildblue.net]
Sent: Friday, January 05, 2007 11:56 AM
To: Haddad, Timothy; GOGA_Planning@NPS.gov
Subject: Restoration at Big Lagoon

Gentlemen:

I would appreciate if you would include the following comments on the Draft EIS/EIR for the Big Lagoon Restoration Project.
Sincerely, Walter Postle, 40 Sunset Way, Muir Beach, Ca 94965
January 4, 2007

Comments on the Big Lagoon Restoration Project

Personal Note: When I moved to Muir Beach in 1973 into a house which overlooks the project site, there were cattle and horses on the hillsides; flower fields in the valley; fish and turtles in Redwood Creek which ran clear and fast. Pacific Way was not flooded and you could buy a soft drink from a stand near the low lying parking lot. In the spring the air was filled with thousands of butterflies. It was a beautiful and interesting landscape with an incomparable soundscape.

After the NPS took over from the State in the early 1990's things changed for the worst with NPS racking up a dismal record. NPS festooned the beach with fences and signs of every description all claiming to warn visitors from disturbing the fauna and flora. The livestock, flowers, turtles, California Red Legged Frogs, butterflies and the hot dog stand all disappeared. The number of fish in the creek dropped away -- the last time I saw fish in Redwood Creek was a couple of years ago and they were floating upside down under the Pacific Way Bridge. NPS let the mouth of the creek to fill up with the result that the water table rose and many trees in the alder grove and along the creek were drowned. Many fell into the creek. The parking lot (a major eyesore) was extended across the valley and raised well above sea level. Ignorant NPS managers found it a convenient place to dump highway spoils. Protests from the locals, that the stream bed and outlet to the ocean was blocked were ignored. Evidently a bright spark in NPS wanted to "restore" the dunes which disappeared literally overnight in major storm in 1982. It did not matter that houses were flooded and the roads covered with a couple of feet of water. Got to have those sand dunes! The creek bed is now clogged with debris and hundreds of thousands of the taxpayer's money has disappeared in attempts to remove the mess. Not a dime was spent widening or deepening the outlet to ocean-- a quick and effective fix. I recall the NPS in order to improve drainage to the Ocean from the entire Redwood Creek watershed, cut a 48 inch wide (!!!) channel through a grove of trees for what it laughing called "an experiment"-- I guess to find out if water flowed downhill.

V-1

1/5/2007

In my opinion, the degraded condition of the area we see today is a direct result of incompetent and negligent management. The federal managers, like Brownie, have done a great job. The villains are not those who farmed the land around Redwood Creek in years past but the folks who are around today drawing paychecks and claiming a mandate to protect the land. V-1 cont.

Specific Comments: If the EIS/EIR is to be believed, we will be lucky to see this project finished in 2010 or 2011-- about 20 years since the first meetings were held to discuss the "restoration" of Redwood Creek. I think most folks would agree that this schedule is a bit slack. This schedule and the NPS's blemished record in Redwood Creek undermine the credibility of this project. V-2

One would think that after all the meetings and the blizzard of paper that this project has created over the years that we would at last have proposals that would resolve all outstanding issues. No so. This plan is defective because it does not answer the core question at Muir Beach: Do we want preserve a unique animal resource or do we want easy parking? We cannot have both. A viable fishery and a giant parking lot cannot occupy the same space.

THE PROPOSED PARKING LOT (ALTERNATIVE B-3-175 CARS AT BEACH) IS TOO BIG, TOO CLOSE TO REDWOOD CREEK, WITH 275 SPACES HAS TOO MANY PARKING SLOTS AND INTRUDES TOO FAR INTO THE RIPARIAN HABITAT. THE PROPOSED ADDITION TO THE FISH HABITAT IS TOO MODEST TO FULLY RESTORE THE FISHERY. V-3

We will always be able to find parking but we will never be able to find fish if we pave over their breeding pools and poison the creek with automobile runoff. We must take the opportunity provided by this project to restore the largest fish habitat possible not the largest parking lot that can be squeezed in close to the beach. Moving the parking lot away from the creek and reducing its footprint is essential for the health of Muir Woods and the watershed. There is no good reason for the parking lot to cut across the mouth of Redwood Creek. The petty changes NPS recommends in alternative B-3 will not do the job. Go back to the drawing board,

I note that NPS proposes to remove the remains of the Muir Beach Tavern. The tavern, which was a major feature of the beach for more than 30 years, is part of the history of the area and should be left alone. There are lots of photographs of the Tavern the site is of equal value as the invisible camp grounds once occupied by the Gratton tribe although it doesn't have the same PC cachet. Remember that the Gratton folks are not sound on environmental protection. Recall that they wanted to build a Casino, hotel and other extravaganzas in the wetlands of Sonoma County. Good luck with this crowd. V-4

Apart from the fatally flawed parking lot option and the strange proposal to destroy the remains of the tavern, I consider the remaining preferred alternatives to be comprehensive and practicable. The EIS/EIR is really a pretty good job--much better than the material produced for the unlamented Comprehensive Transportation

1/5/2007

Management Plan.

1/5/2007

Letter V: Walter Postle (January 5, 2007)

Response to Comment V-1

Comment noted. This is not a comment on the disclosures and findings of the Draft EIS/EIR.

Response to Comment V-2

Comment noted. NPS maintains that the schedule disclosed in the Draft EIS/EIR is realistic.

Response to Comment V-3

NPS has balanced multiple objectives in selecting its preferred alternative, including project objectives and environmental effects, and will continue to review this information as decisions on project alternatives are selected and implemented. As such, NPS has changed the preferred Public Access Alternative from B3 to B4 to improve floodplain functioning and riparian habitat. NPS recognizes that this alternative would provide the most benefit to fish habitat. Please also note that Public Access Alternative B4 proposes to accommodate 175 cars, rather than 275 cars as the commenter suggests. This is the same number of spaces that exist currently.

Response to Comment V-4

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.

W

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Correspondence Information

Status: New	**Park Correspondence Log:**
Date Sent: 03/06/2007	**Date Received:** 03/06/2007
Number of Signatures: 1	**Form Letter:** No
Contains Request(s): No	**Type:** Web Form
Notes:	

Dear Superintendent O'Neill,

Thank you for the opportunity to comment on the DRAFT EIS/EIR for the Wetland and Creek Restoration at Big Lagoon, Muir Beach, Marin County California. I have lived at 190 Pacific Way -approximately thirty yards from the entrance to Muir Beach- continuously for the last twenty-three years, and have witnessed the extreme changes to the lower Redwood Creek and Muir Beach landscape, during that time. I certainly welcome action to restore the area. On the whole, the Preferred Alternatives summarized in the report are both acceptable and beneficial. There are two aspects of the plan on which I wish to comment and that I respectfully ask be given due consideration.

1. Public Access Alternative - Parking Lot. The Preferred Alternative B3 implies that simply relocating the parking lot northward will provide sufficient flow in the lower reach of Redwood Creek, which when combined with the other aspects of the restoration plan, will reduce the likelihood of upstream flooding. This implication is incorrect, and does not account for the hydrologic effect of the height of the parking lot. Years ago, before the NPS added fill to raise the height of the parking lot approximately four feet, the parking lot would flood when there was a combination of high tides, storm surge, and heavy runoff from rains. During these events, flooding of Pacific Way never occurred. Flooding began on Pacific Way the first winter after the parking lot was raised, and has continued to occur at least once every year since. The evidence is very strong that the mere presence of the parking lot is not as much an issue as its height. The assumption in the DRAFT plan that placing the parking lot a minimum distance of 180 feet from the creek will be sufficient. However, unless the level of the parking lot is reduced from its current height and instead reduced to the approximate level of the surrounding land, then the parking lot will continue to be a barrier that causes upstream flooding. Since the parking lot would not be useable during heavy storm events anyway -flooding on Pacific Way would block access to the parking lot, and the NPS would keep Muir Beach closed to prevent danger to the public from high surf and flooding on the beach- there is no public benefit to keeping the parking lot at its existing raised height. The plan should specifically state that the height of the parking lot should be lowered. W-1

2. Interpretive Displays. All alternatives assume installations of "interpretive displays". The NPS has already installed too many "interpretive displays" and signs at Muir Beach and the surrounding trails. Over the last 23 years, my family and I have hosted visitors from all over the U.S., as well as dozens of people from other countries. Visitors often comment on the excessive signage on NPS property. Visitors from other countries such as Norway, Switzerland, Kuala Lumpur, Australia, Italy, and the United Kingdom have all commented that the displays and signage are distracting and that they detract from their enjoyment of the environment. I too find the signage has become excessive, and do not believe any more are necessary or desirable, especially as part of this project. W-2

Thank you for the opportunity to comment on the Draft EIS/EIR for this project. I look forward to the day that restoration of Muir Beach Wetlands and Redwood Creek actually begins.

Sincerely,

Christian Riehl

Letter W: Christian Riehl (March 6, 2007)

Response to Comment W-1

The existing parking lot is approximately 450 feet long, and the lower picnic area is an additional 60 feet long. The parking lot elevations slope from approximately 10.5 feet NGVD on the northwestern end to 13 feet at the southeastern end (adjacent to former picnic area). The high point in the parking lot is the earth berm that separates the two parking stall lanes; this ridge slopes from approximately 12.5 feet NGVD to 14 feet NGVD (northwest to southwest). Adjacent wetlands beachward of the parking lot are approximately 7 to 9 feet NGVD.

We agree that the height (i.e., elevation) of the parking lot affects the flooding levels. As part of the *Feasibility Study* (PWA et al. 2003), hydraulic modeling was used to help examine the effects of the parking lot on flood levels. In a hydraulic model, the parking lot elevation was lowered approximately 3 feet on the southeastern end to elevation 10 feet NGVD.

We used the hydraulic model to test the sensitivity of parking-lot height on flood levels. We performed model runs for the 5- and 50-year flow events and varied the setback distance of the lowered parking lot by 30, 60, 90, and 300 feet (westward from the creek). Under the 5-year event, water levels dropped 0.5, 0.7, and 0.9 feet at setback distances of 30, 90, and 300 feet, respectively. Under these conditions, lowering approximately 90 feet of the raised area at the southeastern end of the existing parking lot could reduce the backwater effect by 0.7 feet; only a modest incremental decrease in flood elevations (0.2 feet) would be achieved from setting the parking lot back 200 feet farther.

The preferred alternative (Public Access Alternative B4) includes a reconfigured parking lot setback approximately 350 feet from the creek bank. Based on results of the hydraulic model, as well as informed opinions of geomorphologists who are cognizant of the effects of rare, but large events, NPS believes the rotated parking lot will fully achieve the protection the commenter seeks. NPS did consider lowering the new parking lot, even though we are confident that pulling it away from the creek alone would achieve the needed area for high flows to pass. The new parking lot would remain inundated under large flood events (such as Q50 and larger). If the parking lot elevation were lowered, it would be inundated more frequently due to creek flooding and/or storm surge, thereby increasing maintenance needs. NPS is choosing to keep the parking lot at about its existing elevation to minimize parking lot maintenance needs. (The exact elevation of the parking lot will be selected during the detailed design phase based on more refined hydraulic analysis.)

Response to Comment W-2

NPS appreciates the commenter's input and concern for the area's natural values. Residents of Green Gulch Farm and the Muir Beach community also have

expressed a preference that the beach remain relatively free of signage so that users can experience the area's natural qualities with a minimum of distraction. On the other hand, public surveys conducted by the Golden Gate National Parks Association have shown that visitors want more information about park resources, recreational opportunities, and trail routes.

NPS intends to balance these two interests by creating a cohesive signage/interpretation plan that provides pertinent information but does not alter the rural, semi-wild character of the area. This approach follows NPS policy 9.3.1.1 that signs

> will be held to the minimum number, size and wording required to serve their intended functions and to minimally intrude upon the natural and historic settings. They will be placed where they do not interfere with park visitors' enjoyment and appreciation of park resources.

The signage plan will be developed during the design phase of the project, following the completion of the Final EIS/EIR.

X

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Correspondence Information

Status: New	**Park Correspondence Log:**
Date Sent: 01/08/2007	**Date Received:** 01/08/2007
Number of Signatures: 1	**Form Letter:** No
Contains Request(s): No	**Type:** Web Form
Notes:	

I will be brief. Muir Beach is a beautiful and important community beach area. I believe it is important to keep the public parking spaces at or near the existing parking location. I believe it is important to keep many parking spaces to allow easy access for 'everyday' people and families. I suggest one hundred spaces as a general number. If parking is further away from the existing location, or very limited in number, this Muir Beach area will become an exclusive area for environmental specialists of various sorts. (There are many, many other beautiful more secluded beach areas that are available to environmental specialists.) Also, by limiting parking to this beach, the GGNRA risks inadvertently creating a parking hazard on or near Highway One. Muir Beach is a wonderful, wonderful place, and I wish to guarantee access to the everyday working man and families as there has always been. Aside from making this point about beach access, I would like to comment that restoration of the creek outflow area is a great project.

X-1

Letter X: Edward T. Sanford (January 8, 2007)

Response to Comment X-1

As discussed in the Final EIS/EIR, Public Access Alternative B4 is now the preferred alternative. Public Access Alternative B4 was determined to be the best option to balance multiple project objectives while avoiding or minimizing environmental impacts. Public Access Alternative B4 would provide the same number of spaces as the existing parking lot and includes 310 linear feet of stacking room for cars between the entrance and the first parking stall. This alternative will allow improved floodplain functioning and habitat enhancement.

Y

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Status: New	**Park Correspondence Log:**
Date Sent: 03/06/2007	**Date Received:** 03/06/2007
Number of Signatures: 1	**Form Letter:** No
Contains Request(s): No	**Type:** Web Form
Notes:	

Despite references to a 5 year and 50 year planning horizon, TRANSDEF was unable to find any analysis of impacts for those years. Under CEQA, the EIR is required to evaluate reasonably foreseeable developments, which would include changes in future park patronage. Given that future demand for park facilities has already been evaluated as part of the Comprehensive Traffic Management Plan, it would be unreasonable for the EIR to be limited to a study of existing conditions only when future projections of use are available. Because the Proposed Project is intended to serve the public for the distant forseeable future, the EIR should include a section that demonstrates successful methods for coping with future increases in visitorship, even if they are not implemented immediately. Y-1

Because the Proposed Project is likely to make Muir Beach a more attractive destination, the following statement in the Air Quality section (p. 4-80.) is unacceptable, making the analysis inadequate: "This Draft EIS/EIR assumes that the project would not result in changes in visitation to Muir Beach." Y-2

The selection of the environmentally superior alternative must not be allowed to be made on the basis of short term parking adquacy. Only an appropriately long term view will be able to adquately determine the optimal size for the parking area for the proposed project. Y-3

Furthermore, the assumption that there is no illegal parking in response to overflow conditions is also unreasonable. This is an impact that should be studied rather than being merely assumed away. Y-4

The year studied was not identified in the title for Tables 4.3.4.2-3, -4, -5, -6, and -7. The title should indicate Existing Conditions. Y-5

Excess parking demand identified in Impacts TC-P6, TC-P7, TC-P8, and TC-P9 was not adquately mitigated. The EIR should study a mitigation package composed of 1). enforcement of local illegal overflow parking; 2). parking charges, high enough to reduce parking demand; and 3). an expansion of the Muir Woods Shuttle system to Muir Beach. The EIR should evaluate the performance of this mitigation package over the longer planning horizons to see whether it can accomodate more park users while reducing traffic congestion and associated auto air emissions and noise (Impact NZ-P3). The consistency of these results with the relevant policy documents (NPS Management Policies, Marin Countywide Plan and Redwood Creek Watershed Vision for the Future) should also be evaluated. Y-6

The EIR should carry an alternative that explicitly complies with the NPS Parking Policy, so that the Policy's impacts can be thoroughly evaluated. In TRANSDEF's opinion, the Parking Policy is seriously outmoded, and Y-7

should not be considered a threshold test for environmental impacts. It fails to consider impacts of parking lots on environmental
resource values of the Park sites it pertains to, and fails to recognize the benefits of Transportation Demand Management in reducing the cumulative environmental impacts of visitor travel. Y-7 cont.

Please note that the section on Energy use ignores the transportation component of energy use. By reducing vehicular travel to the Park, the project could reduce Impact PS-R2. Fossil fuels used in transportation are a non-renewable resource used in an inefficient manner. Y-8

Letter Y: David Schonbrunn (March 6, 2007)

Response to Comment Y-1

As part of the CTMP, projected (2023) parking demand at Muir Beach was estimated as follows (existing demand has been included for reference).

Table 6-4. Projected 2023 Parking Demand at Muir Beach

	Peak Season		Shoulder Season		Off Season	
	Weekday	Weekend	Weekday	Weekend	Weekday	Weekend
Existing parking demand	159	**201**	115	160	30	120
Projected parking demand (2023)	**210**	**260**	145	**200**	50	175

Bold = demand exceeds number of available spaces.

Source: CTMP, unpublished data.

Future increases in parking demand would result in exceeding parking capacity more frequently than under existing conditions. Other ancillary effects would increase over time also, such as the frequency and extent of vehicle queuing; LOS and intersection delay; and risks to pedestrians, equestrians, and bicyclists. As is the case in the near term, these effects would be more severe for smaller parking lots.

NPS was aware of the CTMP's projection of increased demand in the future but chose not to increase the size of the parking lot to meet that demand in order to avoid increased traffic impacts and increased impacts on resources. The commenter makes an argument that the EIS/EIR should demonstrate a method for coping with future increases in visitors. Various parking-lot sizes were considered, one of which would meet current peak-season weekend demand and none of which would meet projected peak-season weekend demand. The maximum size of any parking lot alternative was determined through the use of a hydraulic model to outline an area where parking lot fill would not increase upstream flood elevations. While it would have been possible to increase the capacity of the parking lot slightly (Public Access Alternative B5), the EIS/EIR analyses showed this would increase traffic impacts under the existing condition, regardless of what the future projections are. It is important to note that future increases in parking demand are not a result of the project, but rather an environment in which the project would exist. The preferred alternative does not change parking capacity, so future conditions would be the same whether or not the project were implemented. The project will remedy the impact of parking on natural creek function without increasing traffic impacts.

Finally, projections of parking and visitor demand could change in the future as a result of increases in public transportation, alternative modes of transportation, changed demographics leading to alterations in parking demand, use of Intelligent Transportation Systems (ITS), and other factors that remain speculative. For instance, when the County and Caltrans develop a bus stop on

Hwy 1, some added visitors may reach the site via the Muir Woods shuttle. The project does anticipate this by planning a trail along Pacific Way that will improve the experience and reduce conflicts with vehicles on the road. An improved multi-use trail connection that would result from the proposed Dias Ridge Trail recontouring and rerouting would improve access by methods other than auto. NPS may address other issues related to increased visitor demand over time outside the context of this proposed project. The Draft EIS/EIR provides an adequate analysis of existing and future traffic impacts for the purposes of disclosure, decision-making, and selection of a preferred alternative in the context of the proposed project.

Response to Comment Y-2

The degree to which visitor numbers may change (either increase or decrease) as a result of the proposed project is speculative. There is no basis for determining such a change with any degree of certainty, and the comment does not provide any information that would provide such a basis. Visitor amenities at the site would remain much as they are today, with only modest improvements in condition as a result of the project and no change in parking capacity For this reason, the assumption that visitation would remain unchanged by the project has been used and remains valid for the purposes of the EIS/EIR analysis.

Response to Comment Y-3

The preferred parking-lot size was selected with consideration of a variety of factors, including both existing and future projected parking demand and the sensitivity of the project setting. Public Access Alternative B4 was determined to be the best option to balance multiple project objectives while avoiding or minimizing environmental impacts. Public Access Alternative B4 would provide the same number of spaces as the existing parking lot and includes 310 linear feet of stacking room for cars between the entrance and the first parking stall.

Response to Comment Y-4

Text in the Draft EIS/EIR, page 4-251, describing the methods used to analyze the proposed action's impacts on traffic flow and intersection delay in the project vicinity explains, "Because no data were available on the extent of illegal parking at the site during periods when parking capacity is exceeded, modeling assumed that vehicles accessing the parking lot when the lot was full would either wait for a parking space or leave the site." Illegal parking adjacent to the beach reduces the effect of overflow vehicles on nearby roadways. Because no data are available on what percentage of overflow vehicles park illegally rather than queuing for legal spaces or returning to area roads, it was not possible to make a reasonable assumption about how much reduction in traffic overflow would result from illegal parking. To ensure that the effect of reduced parking-lot size on traffic flow was not underestimated, EIS/EIR analysis assumed that all

overflow vehicles either would queue or return to area roadways rather than park illegally—this gives a conservative, "worst case" analysis of the effects of reduced beach parking on traffic flow near Muir Beach.

The conservative assumptions made in the traffic flow analysis were not intended to avoid discussion of illegal parking effects; NPS and Marin County are aware that some level of illegal parking does occur and that a reduction in parking availability at the beach would likely increase the extent of illegal parking, with corollary effects on local circulation and access. This contributed to the selection of a Public Access Alternative that maintains the existing parking lot size. The potential that a reduction in parking availability at the beach could increase illegal parking on adjacent roads was discussed under Impact TC-P1: Changes in Parking Availability During Construction (EIS/EIR page 4-258) and Impact TC-P6: Long-Term Changes in Parking Availability (EIS/EIR page 4-261).

Response to Comment Y-5

The text introducing each table has been modified in the Final EIS/EIR to clarify the date of the traffic baseline data used to construct the tables.

Response to Comment Y-6

The commenter refers to adverse impacts associated with parking lot alternatives with reduced capacity relative to existing conditions (i.e, B1, B2, and C1). Parking restrictions on roadways accessing Muir Beach are not under NPS jurisdiction; they are enforced by the Marin County Sheriff's Office. However, NPS shares the commenter's concern regarding the adverse effects of illegal parking and is committed to working with the County and local residents to address this problem; as discussed above, the potential that reduced parking availability would increase illegal parking was a key reason for the selection of a preferred Public Access Alternative that would maintain the existing size of the parking lot.

While expansion of the Muir Woods Shuttle system to Muir Beach could alleviate impacts associated with the smaller parking lot alternatives, such expansion of service is beyond the scope of this project and therefore has not been proposed as mitigation.

Response to Comment Y-7

The parking plan for this project does meet NPS Management Policy 9.2.4 for parking, which states, "Permanent parking area will not normally be sized for the peak use day, but rather for the use anticipated on the average weekend day during the peak season of use." As stated previously, the goals of this project do not include regional transportation planning, although nothing in this EIS/EIR precludes NPS addressing these issues through future planning. It is noted that

the commenter believes that NPS Management Policy 9.2.4 is outmoded. It was not used as the sole criterion for the determination of impacts. The preferred Public Access Alternative was identified to minimize impacts on natural resources while still accommodating visitors. Please refer to the analysis thresholds provided in Section 4.3.4.2 of the EIS/EIR.

Response to Comment Y-8

The project itself would not result in the reduction of vehicle trips to the site compared with existing conditions. The public demand for use of the site would not change as a result of the project. The project therefore would not create any transportation-related energy impacts requiring mitigation, and Impact PS-R2 was determined to be negligible, including consideration of the transportation component. For this reason, reductions in vehicular travel to the park were not considered for mitigation in relationship to this project.

Please note, however, that the project does not preclude future improvements to public transportation in the area and the integration of the site with those services. In the event that public transportation is provided to the site, energy demand associated with visitation to Muir Beach potentially would decline. However, this impact would not be realized without public transportation service, which is not part of the proposed project.

Letter Z: Responses to Marin County Planning Commission Hearing Comments

The following paragraphs represent summaries of all oral comments received at the Marin County Planning Commission Hearing in San Rafael, California, held on February 26, 2007; at 11 a.m. Responses to comments are provided immediately after each comment (bullets). In general, oral comments duplicated those received in writing; for this reason, most of the responses refer the reader to the responses prepared to relevant written comments.

Comment and Response Z-1

Comments were received regarding the preference for selection of Bridge Alternative BR-4, the longest bridge alternative, as the preferred alternative.

- Please refer to MR-1 Preferred Bridge Alternative.

Comment and Response Z-2

Concern was expressed regarding the width and aesthetic appearance of the proposed bridge. Commenters are concerned that the bridge would be too wide and not blend in with the rustic character of the area. A request was made for more details on how the bridge width was estimated.

- Please refer to MR-1 and Response to Comment F-7.

Comment and Response Z-3

More information was requested on the Value Analysis and cost estimates conducted for determination of the Preferred Alternative.

- Please refer to MR-1 Preferred Bridge Alternative.

Comment and Response Z-4

Numerous comments were received regarding accommodation of alternative means of transport to the project site, such as local bus service, to reduce congestion on Pacific Way. Commenters expressed the desire for the parking lot size to be reduced to allow for a bus stop and transit service to be included in the proposed project.

- Please refer to Responses to Comments C-4, C-6, F-20, and J-1.

Comment and Response Z-5

Comments were received regarding the parking lot design and concerns over the orientation of the parking lot relative to the creek. Preference for Public Access Alternative C was expressed.

- Please refer to Responses to Comments C-7, J-2, and W-1.

Comment and Response Z-6

Comments were received regarding provisions for separate pedestrian access to the beach and parking lot. A separate pedestrian bridge was also proposed.

- Please refer to Response to Comment N-17.

Comment and Response Z-7

A comment was received about the impact of sea level rise on the frequency and depth of flooding over the bridge.

- Please refer to MR-3 Sea Level Rise.

Comment and Response Z-8

A comment was received regarding riparian restoration and the level of protection that would be provided for salmon refugia and rearing habitat.

- Please refer to MR-2 Salmonid Rearing Habitat.

Comment and Response Z-9

Preference was expressed for selection of the alternatives that would restore the most geomorphic functions of the creek and result in the least amount of fill in the floodplain.

- The commenter's preference is noted. The preferred alternative is anticipated to result in substantial improvement to the geomorphic functioning of Redwood Creek while minimizing the amount of net fill to the floodplain.

Comment and Response Z-10

Commenters requested that signage for the proposed project include regional history about the area and encourage alternative transport to the project site.

- Please refer to Responses to Comments L-7 and W-2.

Comment and Response Z-11

Consideration of population growth estimates and the potential impact on visitor use and traffic at the proposed project site was requested.

- Increases in population, Muir Beach visitation, and associated vehicle traffic were considered in preparation of the EIS/EIR. However, because these are not consequences of the project or its alternatives, their potential impacts were not evaluated. Although the goals of the project do not include addressing increased visitation to Muir Beach, the project would create conditions that are as good or better than existing conditions with respect to accommodation of visitors (such as construction of a new Pacific Way bridge that accommodates two-way traffic and construction of a separate pedestrian trail). Further, the proposed project would not preclude future actions to address increases in visitation over time.