

Section 1

Response to Comments

TABLE 103. COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD FOR GIACOMINI WETLAND RESTORATION PROJECT AND RESPONSE FROM LEAD AGENCIES

Comment Number	Description of Concern Statement or Comment
Purpose and Objectives	
C-1	<p>The Park Service should retain the original purpose of the project that was to remove non-compatible agricultural uses, enhance view opportunities, preclude future development, and create clear undistorted project boundaries.</p>
	<p>Response: As discussed in Chapter 1 of the DEIS/EIR, when the National Park Service (Park Service) signed the Memorandum of Understanding with the California Department of Transportation (CalTrans), the California Coastal Commission (CCC), and the Gulf of the Farallones National Marine Sanctuary (GFNMS), it stated that the purpose of the future project would be “restoring freshwater and saltwater wetlands.” While the legal agreement between CalTrans and the park only obliges the park to mitigate 3.6 acres, all agencies agreed that more fully restoring lands on the acquired property was the ultimate goal, and the MOU called for restoration of a “significant portion” of the historic marsh. Transfer of the mitigation money to the Park Service was approved by the CCC on the condition that the Park Service would either create subtidal and intertidal habitat comparable in character to the area that was impacted by the road repair on State Route 1 near Lone Tree Creek OR restore previously degraded or filled marine or the removal of historic fill, improvement of water circulation, and such other steps as will create or improve habitat for fish, water birds, and other marine or marine-related species. In a separate agreement with the Park Service, CalTrans also stipulated that restoration on the Giacomini Ranch would be in a “manner consistent with the general plan set forth in the feasibility study (PWA et al. 1993). The feasibility study (PWA et al. 1993) established a number of restoration goals, none of which included the objectives listed in the comment letter.</p> <p>During the initial scoping period for the proposed project, the agencies took into account the mitigation requirements imposed by the MOU and agreement with CalTrans and developed a project purpose that refined and improved upon the Park Service’s original stated goal of restoring freshwater and saltwater wetland such that natural hydrologic and ecological processes and functions would be restored in a significant portion of the Project Area.</p>
C-2	<p>Concern Statement (Project Purpose and Priority for Restoration vs. Public Access): Several commenters stressed that they felt that restoration of natural processes and habitats should be primary objective of the proposed project, not public access. Restoration should be a priority for improving water quality in Tomales Bay and for special status species habitat, which the Park Service has a legal obligation to protect and enhance. Human activities would degrade wildlife habitat and wetlands, so restoration actions should minimize human activities in the Project Area, particularly in creek and riparian areas. For this reason, restoration actions should maximize natural quiet and minimize non-natural visual intrusions.</p>
	<p>Response: As discussed in Chapter 1 of the DEIS/EIR, the proposed project has established restoration of natural hydrologic and ecological processes and functions as the primary purpose of the proposed project. However, in keeping with the fact that “providing opportunities for appropriate public enjoyment is an important part of the Service’s mission” (Park Service 2006, Section 8.1), the agencies have also incorporated provision of public access opportunities that do not conflict with the project’s primary purpose as an objective of the proposed project. Although not identified as project objectives, the Park Service also places high value on preserving, to the greatest extent possible, natural soundscapes and landscapes, as well (Park Service 2006; Section 4.4.2.4 and 4.9).</p>
C-3	<p>Construction of the Southern Perimeter Trail violates the project's stated purpose that "public access opportunities should not conflict with the project's purpose of restoring natural hydrologic and ecological processes and functions."</p>
	<p>Response: The agencies felt that the southern perimeter trail would not conflict with the purpose of the project for several reasons. First, because most of the proposed trail would be in an area with an existing trail, there would be very little additional impacted expected relative to existing conditions in terms of impacts on wetlands and riparian habitat and existing wildlife habitat. Most of the actions in this area represent enhancement of existing public access facilities rather than construction of new ones. Increased visitor use of these enhanced facilities would result in only negligible to minor additional impacts to hydrologic processes, riparian habitat, and wildlife use. For example, the proposed bridge over Lagunitas Creek would be developed such that there would</p>

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	<p>be no footings in the creek that would impinge upon hydrologic processes during smaller flood flows. During larger flood flows, overbank topping of the Giacomini Ranch East Pasture creek bank would occur upstream of the proposed bridge, thereby decreasing flood flow velocities around the bridge infrastructure. The proposed trail was developed as a weather-dependent trail, so flooding of the bridge and associated trail would be anticipated during moderate- to large storm events.</p>
C-4	<p>Concern Statement (Project Purpose and Elimination of Public Access): Several commenters stressed that they felt that there should be no new public access facilities constructed as part of the proposed project. Human activities would degrade wetlands and wildlife habitats, and there is enough public access within the Point Reyes-Tomales Bay area already.</p>
	<p>Response: As discussed in Chapter 1 of the DEIS/EIR, Park Service Management Policies directly address the recreation and educational values of wetlands, noting that, “when practicable, the Service will not simply protect, but will seek to enhance, natural wetland values by using them for educational, recreational, scientific, and similar purposes that do not disrupt wetland functions” (Park Service 2006; Section 4.6.5). By incorporating public access as a project objective, the agencies are demonstrating that they are committed to incorporating opportunities for the public to learn about the value of wetlands, the problems facing Tomales Bay, and the restoration process, as long as the opportunities do not conflict with the primary purpose of the project. In addition to incorporating trails, viewing areas, interpretative exhibits, and volunteer/educational opportunities, the Seashore and the CSLC also plan to enable people with disabilities to experience wetlands and the restoration process by providing appropriate public access facilities for those with disabilities. The agencies have developed public access opportunities that would not conflict with restoration or degrade wetland and wildlife habitats. While there are abundant public access opportunities in the Point Reyes region, including opportunities to view wetlands (e.g., Estero Trail, Muddy Hollow Trail, Coast Trail, etc.), the agencies want to enhance opportunities for the local community and Park visitors to experience and enjoy the restored wetland.</p>
C-5	<p>Concern Statement (Project Purpose and Need for Public Access): Several commenters felt that the proposed project should include public access and opportunities to view the restored wetland. Appropriately designed public access would not degrade wetland and wildlife habitats and would improve public transportation safety and would decrease vehicular traffic and associated damage to natural resources from emissions. The Park Service is a national agency that needs to serve the American public that pays for it, not just the local community. By providing access, Americans can become more physically active and gain opportunities to learn about wetlands through interpretation and educational opportunities.</p>
	<p>Response: See Responses to C-2, C-3, and C-4, which address many of the points raised in Concern Statement #5. The agencies has incorporated opportunities in many of the alternatives that address the local community’s previously stated desires and needs for greater public access safety and connectivity between communities. The prevalence of wetlands and privately owned lands at the perimeter of the Project Area limit opportunities to incorporate public access options in the Project Area that would provide exercise, but there are plenty of nearby through- and loop trails within the Park and on adjacent County, water district, and state park lands that would provide these types of opportunities.</p>
Process	
C-6	<p>Concern Statement (Public Input): Commenters believed that the public involvement process was inadequate. Some felt that it was biased toward local residents; others felt that it should be restricted to local residents.</p>
	<p>Response: In a recent study on the effectiveness of NEPA, one of the five key elements of the NEPA process that were considered critical to its effective and efficient implementation included the extent to which an agency provides information to and takes into account the views of the surrounding community and other interested members of the public during its planning and decision-making process (CEQ 1997). As the study noted, the “success of a NEPA process heavily depends on whether an agency has systematically reached out to those who will be most affected by a proposal, gathered information and ideas from them, and responded to the input by modifying or adding alternatives.....” (CEQ 1997).</p>

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	<p>Since the public scoping period and meeting in fall 2002, the Park Service and CSLC have incorporated numerous opportunities for public involvement, including 1) a series of alternative workshops in 2004 for agencies, adjacent landowners, and the general public; 2) public access workshops in 2005 for adjacent landowners and the general public; and 3) a public meeting and 45-day review period for the DEIS/EIR in 2007. All of these public involvement efforts included either formal or informal public comment periods.</p> <p>Because the Park Service is a national agency who serves people throughout the United States, scoping efforts were not limited to the local community, even though the proposed project may have the most effect on that community. While public meetings were all held in west Marin, the public scoping period in 2002 and the public comment period in 2007 were all noticed in the Federal Register, which is a nationally distributed daily publication for rules, proposed rules, and notices of federal agencies and organizations. Notices were also published in the California State Clearinghouse, which coordinates the state level review of environmental documents pursuant to the California Environmental Quality Act (CEQA), and copies of the document were distributed to select university, county, and archival libraries throughout California, as well as outside of California. Finally, notices were also mailed to the Seashore's general mailing list, which includes organizations, agencies, and people throughout California and the United States.</p> <p>We believe that these extensive public outreach efforts have adequately informed and involved both the local community and interested or affected members across the country.</p>
C-7	<p>The Park Service relied too heavily on public comment when designing and choosing alternatives rather than on scientifically defensible information.</p>
	<p>Response: Both the NEPA and CEQA environmental review processes encourage the incorporation of both public input and scientific information in planning, developing, and analyzing projects. CEQ requires agencies to make "diligent" efforts to involve the interested and affected public in the NEPA process (1506.6) and to "encourage and facilitate public involvement in decisions which affect the quality of the human environment" (1500.2 (d)). Under CEQA, an agency must solicit and respond to comments from the public and other agencies concerned with the project. (Title 14, Section 15002(j), also Sections 15073, 15086, 15087, and 15088.) The public has an important role in the NEPA and CEQA processes, particularly in providing input on what issues should be addressed in environmental documents, how alternatives should be added or modified, and how well the documents evaluate potential impacts of a proposed project. Scientific information is used to guide development of reasonable alternatives, evaluate existing conditions, and, perhaps most importantly, evaluate the potential environmental and social consequences of proposed projects. NEPA requires an objective, high-quality scientific analysis of impacts that the proposal or its alternatives may create (1500.1 (b)). CEQA requires that decisions be informed and balanced (Title 14, Section 15003(j)), although it does not require "technical perfection" (Title 14, Section 15003 (i)). As guided by these sections of code, the agencies incorporated both public input and scientific information during the appropriate stage or part of the planning process.</p>
C-8	<p>Is the DEIS/EIR intended to serve as the environmental review for the prospective in-stream flow dedication?</p>
	<p>Response: Yes, the DEIS/EIR incorporates the environmental review for the prospective in-stream flow dedication. It is incorporated as a proposed management action common to all alternatives in Chapter 2, and the effects of the proposed in-stream dedication are evaluated under Public Services – Municipal Water Supply and Distribution.</p>

Impact Analysis - General

C-9	<p>The DEIS/R should compare impacts from a pre-disturbance baseline condition to each alternative rather than to existing conditions.</p>
	<p>Response: Environmental compliance documents are intended to help the interested public understand how conditions would change relative to existing conditions should one of the</p>

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	<p>proposed alternative (Action Alternatives) be implemented or if no action or project (No Action) is implemented. NEPA and CEQA require that alternatives be evaluated with respect to baseline or existing conditions. The baseline is essentially a description of the affected environment at a fixed point in time, whereas the No Action alternative evaluates what would happen and what changes might occur in existing or baseline conditions, even if “No Action” is taken. Often, baseline conditions in NEPA and CEQA are established as the conditions that existed at the time the Notice of Intent or Notice of Preparation was issued. Because evaluation of potential impacts often involves technical and/or quantitative analysis of how conditions would change under various alternatives relative to existing conditions, comparison of each alternative to some historical baseline condition would be difficult, because there is not enough information available typically to accurately describe resource conditions during that period of time. However, while NEPA and CEQA guidance do not support using pre-disturbance conditions for evaluating the intensity of impacts, the agencies notes that restoration is a purpose of the proposed project and the objective of taking action and, therefore, the alternative comparison at the end of Chapter 2 and the impact evaluation in Chapter 4 does provide a considerable amount of comparison between alternatives under the various impact topics.</p>
C-10	<p>Concern Statement (Land Use - General and Agricultural): One commenter felt that limiting public access would help to better preserve the historic character of Point Reyes Station. Another commenter felt that restoration would unacceptably reduce the amount of land devoted to agriculture. A third felt that the expanded range of thresholds used to evaluate impacts to agricultural lands based on the Land Evaluation and Site Analysis needed to be better explained.</p>
	<p>Response: The DEIS/EIR addresses these topics under Land Use and Planning. Under CEQA, the County of Marin requires agencies to address how projects would comply with local land use policies, including whether the project would “result in substantial alteration of the character or functioning of the community or present or planned future use of an area.” In Chapter 4, Land Use and Planning – General, the DEIS/EIR notes that the proposed project would result in no more than minor changes to the character of the community. It also evaluates how the proposed project would affect agricultural land uses and the viability of agriculture in West Marin. The EIS/EIR uses a quantitative approach to evaluate impacts to Agricultural Resources, Operations, or Adjacent Agricultural Land Uses developed by the State Department of Conservation called the Land Evaluation and Site Analysis (LESA). Based on the results of the LESA analysis, the proposed project would have no more than minor impacts on adjacent agricultural land uses. A more complete description of this analysis can be found in Chapter 4, Land Use and Planning – Agricultural Land Use and, in the Final EIS/EIR, Appendix C. These sections have also been updated to include a more complete explanation of the thresholds used to evaluate and categorize impacts as “Negligible,” “Minor,” “Moderate,” and “Major or Substantial.”</p>
C-11	<p>Concern Statement (Air Resources - Air Quality): One commenter requested that the document include the projected NOx emissions from the proposed project and whether it conforms to the State Implementation Plan (SIP): this information is needed to demonstrate compliance with the SIP. Another felt that the DEIS/R did not adequately address impacts to air quality from dust and construction vehicles traveling over sandy roads and that these impacts should be mitigated through spraying of construction roads with water.</p>
	<p>Response: The DEIS/EIR addresses these topics under Chapter 4, Air Resources – Air Quality. In response to the comment on projected NOx emissions, the agencies have added a table in the FEIS/EIR that shows projected emissions of all pollutants emitted during construction and implementation of the proposed project. The agencies have also incorporated additional discussion in the FEIS/EIR regarding whether alternatives conform to the State Implementation Plan (SIP). According to Bay Area Air Quality Management District (BAAQMD), fine particulate matter (PM10) or dust is the pollutant of greatest concern with respect to construction activities (BAAQMD 1999). The analysis of potential air quality impacts under Chapter 4, Air Resources-Air Quality does address generation of dust or PM10 during construction. Based on the amount of cubic yards of material excavated, the impacts would be considered negligible under every alternative. In addition, the agencies would be implementing Best Management Practices or Mitigation Measures designed to reduce the generation of dust or PM10, including, where possible, use of water trucks to spray down major construction routes. More detail on mitigation measures</p>

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	related to Air Quality can be found in Chapter 2 – Impact Avoidance and Mitigation Measures and Chapter 4 – Air Resources – Air Quality, Proposed Mitigation Measures.
C-12	<p>Concern Statement (Air Resources - Noise and Soundscapes): At least one commenter felt that the DEIS/EIR did not adequately disclose or mitigate noise impacts from construction of the proposed project to local residences. Another commenter noted that there would be noise impacts to residences along Levee Road whether the southern perimeter trail was routed across a bridge across Lagunitas Creek or on Levee Road and across the Green Bridge (see Alternatives Eliminated).</p>
	<p>Response: We disagree that the analysis of noise impacts is inadequate or that mitigation has not been thoroughly discussed or disclosed. The DEIS/EIR addresses impacts from construction noise to all residential areas on the Project Area perimeter and has disclosed that impacts in areas could be Major or Substantial, if they are not mitigated. Within very specific areas that are directly adjacent to construction zones, which are called sensitive construction areas in the DEIS/EIR, construction contractors would be required to implement noise-reducing Best Management Practices (BMP). Within sensitive construction zones, construction would be limited to the hours of <u>8 a.m.</u> and 6 p.m. Monday through Friday, with weekends only permissible under authorization by the Park Service and CSLC. All equipment would have sound control devices that are no less effective than those provided by the original equipment and would have muffled exhaust. In addition, contractor would be required to <u>maintain</u> properly tuned equipment and limit idling time to 5 minutes and limit the number of concurrently operating pieces of construction equipment within the Sensitive Construction Area. In addition, the Construction Manager would notify adjacent residences in advance of construction and, if properly notified, potentially reschedule construction activities. These mitigation measures would be expected to reduce, but not necessarily eliminate, impacts from noise to certain sensitive noise receptors or residences, which is signified within the DEIS/EIR by the fact that impacts after mitigation are characterized as “Moderate” or “Less than Significant,” but not No Impact. Unfortunately, there are no mitigation measures available that would completely eliminate impacts during construction.</p> <p>In terms of the second comment, noise impacts from public access along Levee Road and the Green Bridge were not evaluated, because this particular alternative was eliminated from at least project-level evaluation in this document. In the FEIS/EIR, Alternative D now incorporates the potential for the Park Service to work cooperatively with the County of Marin on expanding public access on the southern perimeter of the Project Area, including potentially reevaluating use and improvement of Levee Road in a future environmental document. See C-103 for more detail.</p>
C-13	The Park Service should be aware of a potential for willow tree invasion from south of the Project Area.
	<p>Response: This stand of willow was mapped both as part of the vegetation and wetland maps prepared for the proposed project. This stand of willow appears to be sustained by sheetflow and pooling of groundwater that emerges at the base of the Point Reyes Mesa slope. While it is possible that this willow stand would expand westward were there less public access use of the Green Bridge County park, it is likely that, even without trails, the stand would not expand much further westward, because it is at the extent of its current limit given existing hydrologic patterns and high elevations currently present in the Green Bridge County park.</p>
C-14	<p>Concern Statement (Vegetation Resources - Public Access Impacts): Several commenters felt that inclusion of public access would degrade natural habitats, particularly those sited along riparian corridors. A few questioned whether some of the proposed trails would violate County, Local Coastal Plan, Point Reyes Community Plan, or California Department of Fish and Game policies by intruding into and potentially degrading riparian habitat. At least one felt that the Park Service should offer protection for those habitats that would surpass that of local policies. Another commenter was concerned that the bridge across Lagunitas Creek would create additional pressure to build more trails that would intrude further into wetlands.</p>

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	<p>Response: As noted under C-2, most of the public access trails proposed in riparian corridors are actually improvements of existing trails or roads and would not involve removal or destruction of existing riparian habitat, with the possible exception of a the eastern perimeter through-trail under Alternatives A and B and the bridge proposed under Alternatives A – C. Also, the possible extension of the southern perimeter trail to Inverness Park in the future could result in loss of riparian vegetation along the eastern edge of Sir Francis Drake Boulevard. While the above referenced policies are discussed in Chapters 3 and 4, Vegetation Resources, we have added information to supplement the discussion of impacts to these policies in response to commenters’ concerns.</p> <p>To summarize this additional analysis, some of the proposed trails could violate Local Coastal Plan and Point Reyes Station Community Plan policies or objectives on development within riparian and Point Reyes Mesa bluff corridors, specifically Alternatives A and B. A more complete discussion of this issue can be found in Chapter 4, Vegetation Resources, of the FEIS/EIR.</p>
C-15	<p>Concern Statement (Fish and Wildlife Resources- Noise-Related Impacts): Several commenters felt that noise from public access facilities would adversely impact use of the restored Project Area by wildlife. Public access sited along riparian corridors would also unacceptably degrade wildlife habitat. At least one commenter felt that the DEIS/EIR was inadequate, because it did not fully disclose negative impacts to wildlife and their habitats from trails. Another questioned whether the document had adequately studied the potential for cumulative impacts to wildlife from viewing areas in both the Park Service and County-managed lands. This commenter felt that the total number of viewing areas needed to be maintained at existing levels to ensure that there was no increase in cumulative impacts.</p>
	<p>Response: Analysis of changes in wildlife habitat and use did take into account potential disturbance from visitation, however, because changes are evaluated relative to the continuation of existing conditions, which, in this case, involved operation of a dairy, with several herds or strings, operation of All-Terrain Vehicles (ATVs), backhoes, trucks, and other farm equipment, the impacts of public access were considered relatively minor by comparison and overshadowed by the improvement yielded by the shift from a dairy to a park. Similarly, impacts to wildlife from visitation are also evaluated relative to continuation of existing public access conditions. These existing conditions include evaluation of existing public access and associated impacts on both Park Service (Giacomini Ranch East Pasture and West Pasture north levee, Tomales Bay Trail, Olema Marsh) lands and County park (White House Pool and Green Bridge County parks) lands. This means that the increase in impacts that may occur from adding more viewing opportunities to an area with established viewing areas at White House Pool and Green Bridge County parks is actually assessed as a project impact in the DEIS/EIR rather than a cumulative impact. Relative to the degree of existing use and viewing, increases in visitation were characterized as causing no more than minor additional impacts to wildlife habitat and use. To ensure that these conclusions are clear to the reader, some clarifying language has been incorporated into the discussion in Chapter 4, Fish and Wildlife Resources.</p>
C-16	<p>The impact analysis for salmonids under Fish & Wildlife appears incorrect, because Alternatives C and D are both considered to offer the same increase in aquatic edge habitat even though there’s an increase in tidal channel creation under Alternative D.</p>
	<p>Response: As described in Chapter 2 of the DEIS/EIR, there is actually a small increase in creek creation and a small decrease in tidal creek creation under Alternative D relative to Alternative C. While Tomasini Creek would be fully realigned into one of its historic alignments, creating more total creek and backwater channel relative to Alternative C, much of the upper portion of the new Tomasini Creek within the Project Area would be only tidally influenced in the late summer and early fall when freshwater flows drop and would, therefore, would not be considered a tidal creek. In addition, the small starter tidal creek off Lagunitas Creek proposed in Alternative C was not included under Alternative D in the DEIS/EIR. However, based on the impact thresholds established, Alternatives C and D were considered comparable, because both would offer a Major or Substantial beneficial improvement or more than 50 percent increase in the extent of aquatic edge available as rearing habitat for salmonids. In the FEIS/EIR, Alternative D has been modified to include the small starter channel, so the total amount of tidal channel creation would be approximately equal between Alternatives C and D.</p>

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C-17	<p>Concern Statement (Public Health and Safety - Disease Vectors): One agency commented that the interim restoration period and certain components of the post-construction Project Area such as the freshwater marsh in the East Pasture would require close monitoring to ensure that mosquito breeding conditions are not exacerbated. Mitigation for an increase in mosquito numbers, particularly those of the <i>Culex</i> genus, should include control efforts, as well as vegetation and nutrient management plan.</p>
	<p>Response: Based on Park Service Management Policies (2006), native organisms such as mosquitoes that are often perceived by the public as “pests” are viewed as natural elements of the ecosystem and are allowed to function unimpeded, except under certain conditions. One of these conditions under which native organisms are controlled or managed includes when they pose a human health hazard as determined by agencies such as the U.S. Public Health Service (Centers for Disease Control or the Park Service public health programs; Park Service 2006, Section 4.4.5.1). The Park Service uses an Integrated Pest Management Program to reduce the risk to the public, park resources, and the environment from pests and pest-related management strategies (Park Service 2006, Section 4.4.5.2). Normally, source reduction--eliminating or altering the water so that the mosquitoes cannot breed or complete their life cycle--is the first choice for control (Park Service, IPM Manual). If source reduction is impossible or incomplete, the next tactic to consider should be biological control of the larvae with predators, bacterial insecticides, or growth regulators (Park Service, IPM Manual).</p> <p>Source reduction and vegetation management would not be considered a viable strategy for natural areas, including restored or created habitats such as the freshwater marsh in the East Pasture that is being specifically constructed to pond for a sufficient duration to create habitat for breeding of federally threatened California red-legged frog (<i>Rana aurora draytonii</i>). The Park Service would either monitor this area itself or amend its current permit with the Marin-Sonoma Mosquito & Vector Control District (District) such that it could monitor this area, which is adjacent to a rural residential area. Based on the Seashore’s West Nile Virus Standard Operating Procedure (SOP), the Seashore would then review monitoring results and decide whether to treat with <i>Bacillus thuringiensis</i> (Bti), a biological pesticide which specifically targets mosquito larvae, is biodegradable, and does not have measurable effects on other species.</p>
C-18	<p>Concern Statement (Public Services - Traffic and Transportation- Traffic): Several commenters were concerned that the proposed project would increase traffic and congestion in what they felt was an already heavily visited area. Specific traffic concerns raised included whether traffic impacts had been addressed; impacts from construction of the southern perimeter trail; monitoring of traffic and parking availability in Point Reyes Station and mitigation for impacts if they should occur; and the accuracy of concluding that public access would decrease vehicular traffic.</p>
	<p>Response: The DEIS/EIR evaluates impacts to traffic and transportation that would result from potential increases in visitation associated with construction or improvement of public access facilities, as well as from construction of the proposed restoration and public access components, specifically hauling of excavated sediment, mobilization and demobilization of construction equipment, commuting of construction personnel, and traffic delays and temporary road closures caused by construction. The evaluation of impacts did not assume that public access would decrease vehicular traffic. Rather, it assumed that there would be an increase because of increased visitation. However, this increase would be negligible to minor for all alternatives, because the limited through-trail connectivity offered would be less likely to attract visitors interested in longer or more strenuous visitor experiences, and because some local residents would walk or bike to the trails rather than drive. The increase in visitation could cause moderate impacts on parking demand in Point Reyes Station under Alternatives A and B, but some of these impacts were reduced under Alternatives C and D by relocating the existing 3rd and C Street trailhead to the Green Bridge. Because of the relatively minor effects on traffic that would be anticipated to occur, a traffic study and additional mitigation measures are not considered warranted, particularly since there has been a relatively recent traffic study conducted in Point Reyes Station for the Point Reyes Affordable Housing Project (EDAW 2001).</p>
C-19	<p>Concern Statement (Public Services - Traffic and Transportation-Safety): Many commenters brought up the issue of public safety with regards to public access and the proposed siting of public</p>

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	<p>access in various areas of the Project Area. These comments either addressed how proposed public access facilities would increase public safety or would decrease public safety (e.g., siting of Mesa Road spur trail and parking lot off Mesa Road, which has no sidewalk). One commenter stated that the DEIS/EIR was inadequate, because it did not cite levels of bicycle accidents in West Marin and show that safety for public access is currently minimal under existing conditions. Another commenter felt that Alternative C was undesirable, because it could decrease safety for pedestrians by increasing the number of weekend bicycle riders in the Project Area.</p>
	<p>Response: Additional information to address these specific concerns, e.g., the potential for conflict between pedestrians, bicyclists, and cars, has been added to the Visitor and Resident Experience - Public Access Resources of the FEIS/EIR. To summarize that additional information, the proposed project would be expected to have no more than a minor adverse effect on public safety related to factors such as increased usage of roads and road shoulders to access or connect to constructed or improved public access facilities.</p>
C-20	<p>Concern Statement (Public Services - Municipal Water Supply and Distribution): One agency commented that the DEIS/EIR does not adequately evaluate and mitigate for potential impacts to the municipal water supply system from potential increases in salinity intrusion. The document does not adequately discuss: 1) the potential effect of salinity intrusion on the quality of drinking water, specifically the creation of disinfection by-products through the combination of chlorides with the sodium hypochlorite used for disinfection and 2) potential impacts during drought, as well as normal streamflow years. The mitigation measures proposed do not appear adequate to mitigate for potential impacts. The agency suggests that adequate mitigation might involve the Park Service funding an extension of the existing pipeline to the well at the Gallagher Ranch for use during periods when the Coast Guard wells could be impacted by salinity intrusion.</p>
	<p>Response: The agencies have responded to the agency's comments in the following ways:</p> <ol style="list-style-type: none"> 1) Chapters 3 and 4 have been revised to clarify that salinity intrusion has negative effects on the municipal water supply by not only affecting the taste, but through the creation of disinfection by-products that are also regulated by the California Department of Health Services; 2) The methodology used to evaluate impacts in Chapter 4, Public Services – Municipal Water Supply and Distribution, has been revised to incorporate the potential changes in creek salinities during drought and average-flow periods, and, where necessary, the intensity and nature of impacts have been changed accordingly; 3) Based on hydrodynamic modeling conducted for each of the alternatives, most of the potential impacts from salinity intrusion appear to be caused by incorporation of Olema Marsh into the restoration project. Under Alternatives C and D, hydrologic connectivity of Olema Marsh with Lagunitas Creek would be restored, thereby increasing tidal prism or the volume of tidally influenced waters stored within and discharged during ebb tides from the marsh into Lagunitas Creek. While the prism of Olema Marsh is relatively small compared to Giacomini Ranch, the location of its confluence with Lagunitas Creek is located considerably upstream of that for the Giacomini Ranch, which appears to increase the effect it has on salinities within upstream sections of Lagunitas Creek. Modeling results suggest that, under Alternatives C and D, average chloride concentrations in this reach of Lagunitas Creek would increase by 32 percent over baseline conditions during spring or high tide conditions (>5.5 feet MLLW) under normal-year flows and 27 percent under dry-year streamflow conditions, respectively (KHE 2006a). These impacts would not be expected to alter the quality of the municipal groundwater supply, but rather to affect municipal water supply operations in that it could increase the need for, if not the frequency of, off-tide pumping and the time and freshwater recharge needed to reduce creek-derived chlorides within the aquifer. NMWD currently conducts off-tide pumping during tides greater than 5.9 – to 6.0 feet MLLW to minimize the potential for salinity or chloride intrusion into the groundwater supply system. <p>As noted in the mitigation measures proposed under Alternatives C and D, the agencies have proposed to delay implementation of the major Olema Marsh adaptive restoration elements until:</p> <ol style="list-style-type: none"> 1) monitoring and further investigation of the relationship between Lagunitas Creek and the alluvial aquifer suggest that increased surface water salinities would not pose a threat to the quality of the municipal water supply; 2) there is new information suggesting that restoration of

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	Olema Marsh would not increase salinities or otherwise pose a threat to the quality of the municipal water supply; or 3) NMWD receives funding and moves ahead with construction of a pipeline to the Gallagher Well for use during off-tide pumping conditions. These major adaptive restoration actions include replacement of the Levee Road and Bear Valley Road culverts, which were identified as later-stage restoration elements such that they would only be implemented if initial stage restoration elements did not achieve the desired degree of hydraulic connectivity between Olema Marsh and Lagunitas Creek. As it has done throughout the planning process, the Park Service will continue to meet and work cooperatively with NMWD in trying to gain a better understanding of the dynamics of this complex hydrologic system and to ensure that there are no impacts to municipal water supply from implementation of the proposed project.
C-21	Concern Statement (Visitor Experience - Public Access): Several commenters felt that DEIS/EIR is deficient in assessing the potential impacts of the proposed project on trails and facilities such as bathrooms that are maintained and managed by other agencies such as the County.
	Response: This impact topic was previously addressed under Land Use and Planning – General Land Use as one of the CEQA thresholds contained in the County of Marin’s CEQA checklist. In the FEIS/EIR, the discussion of this topic has been expanded and changed to an impact sub-topic in the Visitor and Resident Experience – Public Access Resources section. To summarize this information, some of the public access components proposed under some of the alternatives would affect facilities owned and/or managed by other agencies, specifically the County of Marin Parks and Open Space District’s White House Pool and Green Bridge County parks. Effects on these facilities would be expected, however, to be no more than minor and not to substantially degrade or to accelerate degradation of physical facilities.
C-22	Concern Statement (Visitor Experience - Visual Resources): Several commenters felt that transportation corridors, including the proposed bridge over Lagunitas Creek, would degrade scenic views and be aesthetically intrusive. At least one commenter felt that the DEIS/EIR incorrectly characterized the stand of willows that grows on the east side of the Green Bridge County park as being negatively viewed by adjacent landowners.
	Response: With a few exceptions, most of the public access components involve improvement to existing trail or road facilities and would, therefore, not constitute more than a minor impact on visual resources. One of the exceptions is the non-vehicular bridge proposed under Alternatives A-C. As discussed under C-27 below, the height of the bridge would need to exceed 16- to 17-foot NAVD88 to allow conveyance of 10-year flood event flows and 18.2 to 19.2 feet NAVD88 to allow for conveyance of the 50- to 100-year flood flows, including the 1- to 2-feet of freeboard that is typically incorporated. Elevation of adjacent lands in White House Pool County park are approximately 11 feet NAVD88, so the bridge would be elevated anywhere from 6- to 9 feet above the surrounding grade. The bridge would be specifically be designed to visual impacts by building it so that it does not exceed the maximum height of the adjacent 30-foot-high tree canopy or 41 feet NAVD88. In terms of the willows that grow along the eastern perimeter of the Green Bridge County park, the agencies had received comments during earlier public scoping and informal comment periods that suggested that some of the adjacent landowners perceive the willows as an impediment to views within that particular portion of the Project Area.
C-23	Alternative C will increase noise, traffic, pollution, and/or congestion in residential areas and impinge on ecological processes.
	Response: Please see the following sections of Chapter 4 of the DEIS/EIR for analyses of these impacts: Air Resources – Air Quality; Air Resources – Noise and Soundscapes; Public Services – Traffic and Transportation; Vegetation Resources; and Fish and Wildlife Resources. Alternative C would potentially increase noise, traffic, and pollution, but this increase would be relatively minor: any potential major or significant impacts during construction would be mitigated to moderate or less-than-significant levels. The agencies believe, however, that Alternative C would not impinge ecological processes, but that it would restore natural hydrologic and ecological processes and functions to a significant portion of the Project Area.
Impact Analysis – Hydrologic and Hydraulic Processes and Flooding	
C-24	Water emerging from sub-street drainages under 4th Street, Point Reyes Station, is hydrologically

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	<p>connected to the restoration project; the DEIS/R inappropriately fails to address this connection.</p> <p>Response: In Chapter 3, Water Resources – Hydraulic and Hydrologic Processes, the DEIS/EIR references emergence of hillside springs or seep flow from the base of the Point Reyes Mesa. It is likely that water emerging from underneath C Street near 4th Street onto the Giacomini Ranch dairy lot represents one of these groundwater seeps or springs. This groundwater source is evident in many areas on the perimeter of the Mesa by the establishment of dense riparian scrub and marshy areas on the edges of the Mesa or even on its slopes. Discussions with groundwater well drillers in the area and site investigations suggest that the source of these seeps and springs is one or more of the shallower water-bearing alluvial layers that have been documented by groundwater well development in the Point Reyes Mesa terrace. Natural groundwater influences in many of these areas have probably been augmented to some degree by septic systems from the relatively densely populated developments on the top of the Point Reyes Mesa and, in some areas, by non-point source run-off from the town of Point Reyes Station.</p>
C-25	<p>The DEIS/R does not adequately address the effects of sea-level rise.</p>
	<p>Response: Sea-level rise is addressed in both Chapters 3 and 4 of the DEIS/EIR. In Chapter 3, Water Resources – Hydraulic and Hydrologic Processes, the issue of sea-level rise is referenced under a description of Tidal Hydrologic Processes in Tomales Bay. In Chapter 4, Water Resources – Hydraulic and Hydrologic Processes, potential effects of sea-level rise are addressed for each alternative under Tidal Prism. In addition, indirect impacts of this issue are also addressed under Vegetation Resources, Fish and Wildlife Resources, and Public Health and Safety – Flooding, and Public Services – Municipal Water Supply. Based on the current level of uncertainty regarding rate and intensity of sea-level rise, the agencies believe that they have adequately addressed this issue in the environmental analysis.</p>
C-26	<p>Concern Statement (Mitigation of Impacts from Urban Run-Off): Several commenters felt that the Park Service needed to address non-point source runoff from Point Reyes Station in the DEIS/EIR and that these impacts needed to be monitored and mitigated either by the Park Service or the County.</p>
	<p>Response: The issue of non point source run-off is addressed in Chapter 3 of the DEIS/EIR under Water Resources – Hydraulic and Hydrologic Processes, Stormwater Run-off Sources for Project Area. Because the proposed project would not necessarily change the alignment or loading rates of the three known sources of run-off that flows into Lagunitas Creek or the Giacomini Ranch, this issue is not separately addressed in Chapter 4, although it is indirectly addressed by evaluation of the improvement over time in downstream loading rates from Lagunitas Creek into Tomales Bay and in the quality of waters within the Giacomini Ranch East Pasture. The San Francisco Regional Water Quality Control Board has done some monitoring of pollutant loads within these run-off sources (RWQCB 2001). As part of the long-term monitoring program, the Park Service has monitored some of the downstream receiving waters within the Giacomini Ranch (Parsons, <i>in prep.</i>). Reduction in pollutant loading within these run-off sources would need to be addressed by agencies responsible for maintaining the stormwater run-off system within the town of Point Reyes Station. In addition, residents could help to decrease pollutant loading through decreasing fertilization of lawns, washing of cars, and other activities that lead to introduction of pollutants into urban run-off.</p>
C-27	<p>Creation of a bridge across Lagunitas Creek will impede natural hydrological processes.</p>
	<p>Response: The pedestrian-bicycle bridge proposed under Alternatives A-C would affect hydrologic processes, however, as described in Chapter 4, Public Health and Safety – Flooding, the bridge has specifically been designed to minimize its impacts on these processes. It would be designed to accommodate flows equal to or greater than those conveyed by the vehicular Green Bridge directly upstream of the Project Area, which only floods under the largest storms. The height of the bridge would be high enough to allow most small to moderate flood flows to pass underneath. During larger storms, the bridge would be inundated such that flows would pass over the deck, but flow velocities would be reduced in this reach relative to upstream locations, because overbank flooding would have occurred, thereby dissipating the erosive energy of flood flows. Based on expected flood elevations in this reach (KHE 2006a), height of the bridge would need to</p>

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	<p>exceed 16- to 17- feet NAVD88 to allow conveyance of 10-year flood event flows and 18.2 to 19.2 feet NAVD88 to allow for conveyance of the 50- to 100-year flood flows. Bridge heights would need to be raised 1- to 2-feet additional vertical feet in order to provide needed freeboard. The southern perimeter trail has been specifically designed as a weather-dependent trail, so public access components would not be designed to necessarily allow access under all conditions.</p> <p>The bridge was specifically proposed for this location, because this particular reach was narrow enough to allow the bridge to be constructed without footings in the active channel or portion of the floodplain that would be flooded on a frequent basis (~every 1.5 – to 2 years). Most of the adverse impacts from bridges come from installation of footings in the channel or active/bankfull floodplain of creeks, so hydrologists recommend creating bridges that span the active floodplain where possible. The amount of armoring or riprapping would be the minimal amount necessary required to protect the footings.</p> <p>This portion of the estuary is a dynamic system, and, so, to some degree, public access would need to be dynamic, too. Should at some point flood flows negatively affect the trail or bridge, public access alignments and infrastructure would be modified to adapt to the changed resource conditions rather than modifying the resources to fit the existing public access alignment. Because of these design features, the agencies believe that the bridge would not necessarily impede natural hydrologic processes, although installation of a bridge is always a less preferable course than finding another alternative that does not involve bridge construction.</p>
C-28	<p>Extensive excavation under Alternatives C and D could result in unacceptably high siltation in Tomales Bay.</p>
	<p>Response: Although excavation would occur under both alternatives, with more in Alternative D, impacts from siltation would be minimized by a number of factors. Most of the excavation under Alternatives C and D would come from removal of levees and construction of tidal creeks. The areal extent of excavation is actually quite limited for these activities relative to the size of the remainder of the Giacomini Ranch, which would remain vegetated following construction. There would be scraping of the top 6 inches of the southeastern portion of the East Pasture to remove weeds, but this area would be seeded and actively revegetated to some degree to minimize erosion and would only be inundated a few times a year, if that. The extent of excavation does increase under Alternative D due to lowering of higher elevation areas to active floodplain and intertidal marshplain elevations, however, this area would also be actively revegetated to minimize erosion. During construction, Best Management Practices would be employed to avoid or minimize the potential for siltation in downstream areas, including installation of siltation control fencing to capture and contain soils loosed during earthmoving and temporary water diversion measures when construction must occur at the toe or within creeks themselves. See Chapter 2 of the DEIS/EIR for more information on Impact Avoidance and Mitigation Measures.</p>
C-29	<p>Concern Statement (Flooding Effects on County Parks): At least one agency commented that the agencies should mitigate for damage caused to County-managed public access facilities by additional flooding caused by the proposed project, including any necessary trail repairs from erosion or other damages or any need to elevate the trails to maintain access. These mitigation measures could include improvement of drainage facilities in the park and parking lot, construction of an elevated boardwalk, or construction of an elevated parking lot.</p>
	<p>Response: Based on hydraulic modeling results, the proposed project would actually decrease vertical flood elevations in the vicinity of County-managed parks, so mitigation measures are not warranted. As described under Public Health and Safety-Flooding, hydraulic modeling conducted for the proposed project shows that all of the action alternatives (Alternatives A-D) would result in a moderate reduction of vertical flood elevations of Lagunitas Creek for the section of creek between Olema Creek and White House Pool under Alternatives A – D. During 10-year flood events, vertical flood elevations could be reduced as much as 0.5 to 0.9 feet (KHE 2006a). In addition, under Alternatives C-D, standing water levels within Olema Marsh would be reduced, which would reduce the severity of flooding of Levee Road and the southern portion of the White House Pool County park. There would be smaller reductions in vertical flood elevations for the Green Bridge County park, similar to that discussed for the eastern portion of Levee Road in Chapter 4 (KHE 2006a).</p>

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Comment Number	Description of Concern Statement or Comment
C-30	<p>Will any of the alternatives increase the frequency or severity of flooding on the properties along the east side of Sir Francis Drake Blvd just north of the Project Area towards Inverness? If restoration actions will increase flooding, will the Park Service mitigate adverse impacts to these homeowners?</p> <p>Response: Based on hydraulic modeling results, the proposed project would not increase the frequency or severity of flooding for properties north of the Project Area. Hydraulic modeling of vertical flood elevations north of the Project Area and south of open water portions of Tomales Bay suggest that the added floodwater storage created by removing the Giacomini Ranch levees would effectively reduce vertical flood elevations across the entire Lagunitas Creek delta. For example, under Alternative C, vertical flood elevations for properties on the east side of Sir Francis Drake Boulevard directly adjacent to Fish Hatchery Creek could be 0.1 foot lower than under existing conditions, based on modeling results (KHE 2006a). Vertical flood elevations would not increase above those that currently exist under any of the alternatives. These results could change if Lagunitas Creek changed its current channel course. The levees have maintained the current channel alignment in roughly the center of the southern portion of the Bay. If levees were removed, the channel could change course and even reoccupy one of its historic alignments in what is currently the Fish Hatchery Creek channel, which is some distance west of the current channel. This alteration in channel alignment could change the effect of the proposed project in terms of the erosive energy or scour of flood flows and instantaneous peak flood levels, which may lead to damage of adjacent lands and necessitate improvement and strengthening of levees for homes on the east side of Sir Francis Drake Boulevard north of the Project Area.</p>
C-31	<p>Alternatives B-D propose construction of low berms around private properties immediately adjacent to the West Pasture along Sir Francis Drake Blvd; the Park Service should better describe these berms.</p> <p>Response: As described in Chapter 4, Public Health and Safety-Flooding, flooding of private properties adjacent to the West Pasture in Inverness Park by Lagunitas Creek could increase under Alternatives B-D. However, hydraulic modeling, combined with detailed topographic surveys, suggests that the effects of these increases in vertical flood elevations would be restricted to the eastern portion of properties that are undeveloped and would NOT affect homes, garages, driveways or the health and safety of residents by limiting access to or by emergency medical or other types of public service personnel. Because of this potential increase in flooding by Lagunitas Creek during certain flood events, the agencies proposed construction of low-elevation earthen berms for some of the lower elevation homes or properties as one of the potential mitigation measures.</p> <p>The DEIS/EIR noted that these berms would probably need to be at least 2- to 3- vertical feet in height to maintain existing flood protection during 50- to 100-year flood events. Additional detail was not provided in the DEIS/EIR, because the dimensions of the berm would depend upon which property it was being built to protect. Any berm constructed would require that the agencies contract with a geotechnical engineer to complete the necessary soil/geotechnical studies and provide design assistance. In addition, any berm design would need to take into account hydraulic issues, including the fact that most of the flooding of these homes is currently caused by tributaries draining the Inverness Ridge, which discharge flow and sediment underneath Sir Francis Drake Boulevard and into the West Pasture. Berms that inhibit the passage of these material or improperly designed berms could exacerbate flooding of properties by these creeks.</p>
C-32	<p>Tidal inundation on the West Pasture may impact adjacent septic systems.</p> <p>Response: Implementation of the proposed project would be expected to have no adverse impact on septic systems for homes within the West Pasture (Greg Kamman, KHE, <i>pers. comm.</i>). Based on modeling results, removal of levees and increased tidal exchange would improve drainage of both tidal waters and floodwaters relative to the somewhat impounded conditions that exist currently and could actually improve functioning of septic systems by lowering local groundwater tables (G. Kamman, KHE, <i>pers. comm.</i>). See Public Services – Wastewater Treatment and Disposal in the FEIS/EIR for additional information. Septic systems for these homes are located within the apex of alluvial fans formed by sediment deposited from outflow of the numerous small perennial Inverness Ridge drainages that flow out into the West Pasture. These systems probably lie anywhere from approximately 3- to 9 feet above the extremely shallow groundwater table that underlies the West Pasture that is fed by strong surface water and</p>

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	<p>groundwater flow from the Inverness Ridge. An increase in tidal exchange with Lagunitas Creek would not affect these systems, because tides would not reach the elevations of the homes and septic systems (maximum tide elevation = 7.0 feet NAVD88), and any effect on tides on the groundwater table through an increase in hydraulic pressure would be expected to be extremely localized and only extend within a few feet of creeks such as Fish Hatchery Creek (Greg Kamman, KHE, <i>pers. comm.</i>).</p>
C-33	<p>Various culverts along the Project Area perimeter are proposed for replacement. Before the County approves the work, it will require that detailed hydrology and hydraulic analysis be provided to ensure that the project will not result in any increased risk of flooding. It is also concerned that the project design should incorporate the County's need to maintain county road and culverts, including clearance for equipment and personnel.</p>
	<p>Response: Through the contract with Kamman Hydrology & Engineering, Inc. (San Rafael, CA), detailed hydrologic and hydraulic analyses have been conducted for sections of creek where culverts have been proposed for replacement under one or more alternative, specifically Bear Valley Creek at Levee Road, Bear Valley Creek at Bear Valley Road, and Tomasini Creek at Mesa Road. A specific project need and design criterion for these structures was to increase conveyance of flood flows. Another design criterion was to minimize maintenance associated with sediment accumulation. Preliminary siting, hydraulic analyses, and modeling results indicate that the conceptual designs proposed for these crossings would achieve these objectives. During the engineering and final design phase, the agencies would continue to work closely with the County to allow the County the opportunity to further review analyses and proposed designs to ensure that it meets County flood control, maintenance, and fish passage requirements.</p>
<p>Document Content and Structure</p>	
C-34	<p>Concern Statement (Suggestions on Improvement of Document Structure): Several commenters had suggestions for improving the structure of the DEIS/EIR. These suggestions included: 1) a table in Chapter 2 showing acreages restored, feet of levee removed, and other parameters; 2) more tables and figures in Chapter 4 to improve the ability of the reader to compare alternatives; 3) better graphics, including typical cross-sections, to depict what public access would look like; 4) inclusion of the Land Evaluation and Site Analysis (LESA) worksheets that were used to evaluate impacts to agricultural land use and a write-up in the Appendices.</p>
	<p>Response: The EIS/EIR has been modified to incorporate a table in Chapter 2 that provides a comparison of the restoration and public access changes proposed under each of the proposed alternatives. Where possible, more tables have been incorporated into Chapter 4 to help readers follow changes that could potentially occur under each of alternative. The Land Evaluation and Site Analysis (LESA) worksheets – the results of which are discussed in Chapter 4, Land Use and Planning- Agricultural Land Use – have been added to the FEIS/EIR as an appendix. Because many of the proposed public access components involve relatively minor improvements to existing facilities such as conversion of earthen trail to decomposed granite, cross-sectional figures were not considered warranted in many cases. The DEIS/EIR did provide an example cross-section for the low-elevation boardwalk proposed as part of the eastern perimeter through-trail, as well as an example graphic of prefabricated bridge as proposed for the southern perimeter through-trail. Because the possible extension of the southern perimeter through-trail to Inverness Park is considered in this document as a programmatic component and not as a project-level component, cross-sectional figures were not considered appropriate.</p>
<p>Concern Statement (Suggestions on Improvement of Document Content): Several commenters had suggestions for improving the content of the document. These suggestions included:</p>	
C-35	<p><i>The DEIS/R did not adequately describe the relationship between Park Service and CalTrans with respect to this project, which is defined by a Memorandum of Understanding between the two parties. The Park Service failed to reproduce this MOU in the EIS/R.</i></p>
	<p>Response: The relationship between the Park Service and the California Department of Transportation was discussed in Chapter 1 at a level of detail that the agencies believe is adequate to allow the public to understand the relationship and the Memorandum of Understanding. The agencies do not believe that incorporation of the MOU in the document is necessary for the</p>

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	purposes of understanding, reviewing, and commenting upon the proposed alternatives and the analysis of impacts, however, the MOU will be posted on the Seashore's web page under the Giacomini Wetland Restoration Project for those who are interested in reviewing it. Also, interested public can visit the Seashore's headquarters to review the MOU or request that the Park Service mail a copy.
C-36	<i>The MOU does not precisely define how much of the Giacomini Ranch would be restored to wetlands; the Park Service preferred alternative has an unacceptable bias toward ecological restoration at the expense of public access. The DEIS/R is inadequate, because it does not describe why CalTrans funds "have a link to being used to consider 'Transportation' issues on and near the subject property."</i>
	Response: The purpose of the agreement between the Park Service and CalTrans was to transfer obligations to mitigate impacts to aquatic habitat caused by repair of State Route 1 to the Park Service in exchange for monies for purchase and restoration of a "significant portion" of the Giacomini Ranch wetlands. In other words, the repair of State Route 1 caused impact to aquatic habitat, and CalTrans was obligated to provide off-site mitigation at another location. Because the Giacomini Ranch was located in the general vicinity of the road impact, the regulatory agencies agreed to CalTrans transferring its mitigation obligations to the Park Service in exchange for CalTrans providing monies to the Park Service for acquisition and restoration of the Giacomini Ranch. While mitigation obligations agreed to by regulatory agencies specify that only 3.6 acres of wetlands have to be restored for obligations to be fulfilled, the agreement between CalTrans and the Park Service calls for restoration of a "significant portion" of the historic marsh. Because of this, the primary purpose of the proposed project is restoration, although public access is incorporated as an objective as long as opportunities do not conflict with restoration. While CalTrans is a state of California transportation agency, there is no link between the CalTrans wetland mitigation monies and transportation issues such that the monies must be used to consider transportation issues.
C-37	<i>Include GFNMS as one of the political recognitions of the importance of Tomales Bay to wildlife.</i>
	Response: This will be incorporated into the FEIS/EIR where appropriate.
C-38	<i>The project background in Chapter 1 does not discuss the Park Service mission to provide opportunities for appropriate public enjoyment or the relevant Park Service Management Policies that seek to enhance natural wetland values by using them for educational, recreational, scientific, and similar purposes.</i>
	Response: This background information is incorporated in Chapter 1 of the DEIS/EIR under the section where the project objectives, including public access, are described.
C-39	<i>The DEIS/R rejects the use of the Green Bridge to be used as part of the southern perimeter trail due to the "substantial concerns" of local residents. This statement is not adequately supported in the document.</i>
	Response: The agencies have incorporated some additional summary information on concerns of Levee Road residents regarding routing of an access alignment on Levee Road from the two technical public access studies conducted during the planning process. This alignment was included in the preliminary public access concepts, but eliminated from the final alternatives presented and was not analyzed at a project-level in the DEIS/EIR. During the early planning process, Levee Road residents voiced substantial concerns at several meetings regarding potential impacts of this alignment on noise, traffic, and public safety. Similar concerns had apparently been voiced almost two decades earlier during public scoping efforts for the West Marin Pathways Study (Wittenkeller and Associates and Copple Foreaker & Associates 1988). The Park Service recently received a joint letter from residents along Levee Road stating they would prefer that the southern perimeter trail be routed along Levee Road rather than across Lagunitas Creek via a non-vehicular bridge.
C-40	<i>In Chapter 3, sharp fluctuations in salinity of Lagunitas Creek during the summer are discussed, and no strong conclusion is made as to whether these events stem from natural or unnatural causes. NMWD comments that the variation can be attributed to MMWD adjusting releases from Kent Lake to maintain the flows upstream at the Samuel P. Taylor gauge while the reported data referenced here is</i>

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	<i>collected at the Gallagher gage.</i>
	Response: This would appear to be a reasonable explanation for these fluctuations, however, because Marin Municipal Water District (MMWD) does not quantify its releases, other possible reasons for these fluctuations cannot be ruled out.
C-41	<i>The DEIS/R is inadequate because it does not describe that the site of the railroad grade was not wetland habitat prior to construction of the railroad.</i>
	Response: It is difficult to draw this conclusion because most of the information on physical and biological resources prior to construction of the railroad in the late 1800s comes from highly detailed maps prepared by U.S. Coast Survey maps that only cover low-lying intertidal areas subject to possible boat navigation. However, some of the earliest 1942 aerial photographs show riparian vegetation on the face of the Point Reyes Mesa. The presence of groundwater in the coastal marine terrace suggests that mesic vegetation such as willows have probably been present for some time, although the extent of this vegetation on the face of the Mesa could have increased since that time in response to: 1) changes in groundwater patterns and 2) berming of Tomasini Creek along the perimeter of the Mesa.
C-42	<i>The EIS/R does not incorporate 2005 Park Service transportation legislation.</i>
	Response: This information will be reviewed for applicability and, if appropriate, incorporated into the document.
	Concern Statement (Corrections of Factual Inaccuracies or Questions of Factual Accuracy in Document): Several commenters wanted to correct factual inaccuracies or questioned factual accuracy of certain statements in the document. These included:
C-43	<i>The Point Reyes Community Plan was published in 2001, not 2000.</i>
	Response: Correction incorporated.
C-44	<i>The zoning designation of the parcels on C Street in Point Reyes Station is incorrect in the EIS/R.</i>
	Response: Correction incorporated. References to "commercial residential" have been changed to "coastal residential."
C-45	<i>The DEIS/R noted that Value Analysis attendees included representative from GFNMS. It did not, and GFNMS would not have endorsed Alternative C as the Preferred Alternative. Please change text in ES, Chapter 1, Chapter 2, Chapter 5.</i>
	Response: Corrections incorporated.
C-46	<i>Clarify that Cordell Bank Sanctuary does not share any marine boundaries with the Park.</i>
	Response: Correction incorporated.
C-47	<i>Correct mistakes in list of agencies owning lands in the Land Use section in Chapter 4.</i>
	Response: Corrections incorporated.
C-48	<i>The DEIS/EIR states that 2 cfs of water is pumped from the Downey Well to the Giacomini Ranch for irrigation purposes. This is incorrect. The NMWD agreement commits 1.23 cfs of irrigation water to be delivered. Actual experience has shown that the amount delivered is closer to 1 cfs.</i>
	Response: The Giacomini family has an appropriate water right for up to 2 cfs. NMWD's contract with the Giacomini family is for only 1.23 cfs, according to NMWD.
C-49	<i>In Chapter 1 under Constraints, the DEIS/EIR states saltwater intrusion conditions into groundwater wells in Point Reyes Station would not exceed current levels or any increase caused would be mitigated. It is not clear that saltwater intrusion conditions would not exceed current levels under the project alternatives, nor is it clear that the Park Service will fully mitigate any increase.</i>
	Response: The statement in Chapter 1 reflects one of the constraints that the agencies identified as helping to guide project planning and alternative development and design process.

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	The agencies believe that they have fully incorporated this constraint into project planning, design, and impact analysis, as evidenced by the considerable amount of meetings with North Marin Water District staff and computer modeling that was performed to try and determine what effect the proposed project would have on salinities in upstream portions of Lagunitas Creek. The adequacy of the analysis and the proposed mitigation measures are discussed under C-20.
C-50	<i>In Chapter 2, it is stated that Water Right Order No. 95-17 prohibits installation of a gravel dam. The SWRCB actually directed that the Giacomini no longer install the summer dam at its former location after 1997, but does not prohibit installation of a summer dam upstream of the Green Bridge. The Giacomini family chose not to install a dam upstream but rather to pursue an agreement with NMWD for provision of these waters.</i>
	Response: Clarification noted and incorporated. While a dam could be installed, it should be noted that it would need to undergo full environmental compliance process prior to installation.
C-51	<i>In Chapters 2 and 3, it is stated that the Giacomini family has a 0.5 cfs appropriative water right and that NMWD has a water right for 0.666 cfs on Fish Hatchery Creek. NMWD questions the accuracy of these statements.</i>
	Response: The Giacomini family was issued an appropriative water right license for 0.5 cfs of direct diversion between April 1 and December 1 on Fish Hatchery Creek (A021371; License No. 009730) in 1971.
C-52	<i>In Chapter 2, the DEIS/EIR states that the NMWD's agreement with the Giacomini family would terminate with the close of the dairy. NMWD notes that it will terminate on July 1, 2008.</i>
	Response: Correction incorporated.
C-53	<i>In Chapter 3, the DEIS/EIR notes that NMWD has a water right on Bear Valley Creek. Please clarify that NMWD holds no permanent water right on Bear Valley Creek. It secured a temporary permit in 1977 for use during that year.</i>
	Response: Clarification noted and incorporated.
C-54	<i>In Chapter 3, the DEIS/EIR states that the study commissioned by NMWD in 1997 recommended implementation of the off-tide pumping practice. NMWD comments that the 1997 study recommendations did not include institution of off-tide pumping, but rather construction of a pipeline to Gallagher Ranch well.</i>
	Response: Correction incorporated.
Alternatives	
C-55	Alternatives A and B do not provide adequate ecological restoration.
	Response: The Park Service's mitigation agreement with CalTrans called for restoration of a "significant" portion of the historic marsh, although, legally, the Park Service is only required to mitigate at least 3.6 acres. This language is reflected in the project purpose, which states that the purpose of the proposed project is to restore natural hydrologic and ecological processes and functions within a significant portion of the Project Area. "Significant" is not defined in the MOU with CalTrans, however, the Park Service interpreted the language as meaning a majority of the Giacomini Ranch when developing alternatives. Under Alternative A, natural hydrologic and ecological processes and functions would be restored to approximately 350 acres of the 550-acre pastures, while under Alternative B, they would be restored to all the pastures. Based on these factors, Alternatives A and B appear to meet the project purpose and provide adequate ecological restoration, although, as noted in the DEIS/EIR, neither was the preferred alternative.
	Concern Statement (Changes to Alternatives or Preferred Alternatives): A number of commenters submitted comments regarding changes to alternatives or changes to the preferred alternatives. Many of the changes proposed to specific restoration or public access components are discussed in separate sub-sections below. Changes proposed to the structure of alternatives and to the choice of preferred alternative are synopsis below.
C-56	<i>The Park Service should implement the preferred alternative, Alternative C, but without the public</i>

TABLE 103. COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD FOR GIACOMINI WETLAND RESTORATION PROJECT AND RESPONSE FROM LEAD AGENCIES	
Comment Number	Description of Concern Statement or Comment
	<i>access components along the railroad grade.</i>
C-57	<i>Alternative C should be the alternative implemented, but it should include a through-trail on the railroad grade.</i>
C-58	<i>Alternative D should be modified to eliminate the proposed spur trail extended from Railroad Point south on the railroad grade.</i>
	Response: The project planning team considered all comments from the public on preferences for alternatives and alternative elements, both during scoping and the DEIS/EIR review period. The agencies elected to keep the public access components on the eastern perimeter in Alternatives C and D as proposed in the DEIS/EIR with two spur trails in Alternative C and one spur trail in Alternative D. Alternatives A-D provide a balanced range of public access options on the eastern perimeter that are compatible with other restoration and public access components under each alternative.
C-59	Concern Statement (Alternative D Should Be Preferred Alternative): Many commenters felt that the preferred alternative should be Alternative D.
	Response: Based on public and agency input, the agencies have shifted their preferred alternative to Alternative D, which has been modified slightly in the FEIS/EIR to reduce some of the environmental impacts associated with excavation. As discussed in Chapter 2 of the DEIS/EIR, the agencies originally selected Alternative C as the preferred alternative, even though it had identified Alternative D as the environmentally preferred alternative, because it appeared to best meet the project purpose and objectives by providing full restoration while also providing a moderate amount of public access. This combination appeared to best meet needs expressed by commenters during extensive formal and informal scoping for increased safety and connectivity between communities. However, comments from review of the DEIS/EIR appeared to be quite different during those received during scoping or early public input. Many of the comments received on the DEIS/EIR indicated were concerned that the public access components suggested under Alternatives A-C were largely incompatible with restoration and that these access components would increase traffic, noise, pollution, and change the rural character of an area already considered to be too congested by visitors on the weekend. Ultimately, the objective of incorporating public access is to provide restoration- and resource-compatible opportunities to view and enjoy the restored wetland for both able and disabled visitors and residents. Because the agencies believe that public access that is resource-compatible and that provides opportunities to view and enjoy the restored wetland for both able and disabled visitors and residents is desirable, some of the modifications to Alternative D in the FEIS/EIR also include incorporation of an ADA-compliant trail component and a programmatic component for developing a southern perimeter trail system in the future in cooperation with the County of Marin.
C-60	Concern Statement (Alternative D Should Be Preferred Alternative, but Modified to Include Bridge): Many commenters felt that the preferred alternative should be Alternative D, but that it should include a bridge. At least one commenter felt that the spur trails proposed in Alternative D would be "orphan" trails that would force non-vehicular traffic onto the unsafe shoulders of Levee Road.
	Response: The goal of alternatives developed and presented in the DEIS/EIR was to present a range of public access opportunities, from the extensive public access incorporated in Alternative A to the minimal public access included in Alternative D. Ultimately, the objective of incorporating public access is to provide restoration- and resource-compatible opportunities to view and enjoy the restored wetland for both able and disabled visitors and residents. In developing alternatives, the planning team created a range of restoration and public access options, and, because Alternative D represented the most restoration, the decision was made to eliminate the bridge from at least project-level consideration, because it could have negligible to minor hydrologic impacts. Based on this perspective, the limited facilities proposed under Alternative D meet this objective of the proposed project, even if they do not provide through-trail connectivity that would allow non-vehicular traffic such as bicycles to move off road shoulders such as a non-vehicular bridge over Lagunitas Creek. The issue of whether the proposed project would adversely affect public safety is now addressed as a sub-topic in the FEIS/EIR under Visitor and Resident

TABLE 103. COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD FOR GIACOMINI WETLAND RESTORATION PROJECT AND RESPONSE FROM LEAD AGENCIES

Comment Number	Description of Concern Statement or Comment
	Experience – Public Access Resources.
C-61	<p>Concern Statement (Alternative D Not the Most Environmental Option): Several commenters disagreed with the project proponent’s assessment that Alternative D would be the environmentally preferred alternative. They noted that extensive grading would be disruptive to wildlife and would more air quality impacts, demand for non-renewable resources, and traffic in the local community and region.</p>
	<p>Response: As discussed in Chapter 2 of the DEIS/EIR, these are many of the very same issues that the project planning team brought up in evaluating which of the alternatives would be the environmentally preferred one. Ultimately, the environmental advantages of excavation were considered large enough to outweigh some of the impacts. The document notes that the project planning team thought that the environmental advantages of Alternative D over Alternative C as proposed in the DEIS/EIR were relatively slight. In the FEIS/EIR, Alternative D has been modified slightly to reduce the depth of excavation in the southwestern portion of the East Pasture, which should decrease some of its environmental impacts and increase the relative advantage that it offers over Alternative C.</p>
C-62	<p>The Park Service should not implement any restoration alternatives, because natural processes, such as tides and annual floods, will restore the wetlands without the expense of planned restoration.</p>
	<p>Response: Flood-induced erosion and lack of maintenance of levees could eventually result in unplanned breaches and degradation over time of the levee system from many portions of the Giacomini Ranch. However, this process would take decades to unfold and would both delay the hydrologic and ecological benefits that restoration would provide, as well as result in most of the levee material being swept out during flood flows to Tomales Bay, which has already been declared impaired by the RWQCB for sediment. Excessive sediment decreases water quality and clarity and contributes to continued “shallowing” of the Bay, which is already considerably shallower than it was under historic conditions. Under the proposed project, most of the excavated levee material would be hauled away to a quarry for use in restoring degraded lands: some materials would be spread across the pasturelands. This would decrease short- and long-term impacts from sediment to the Bay.</p>
C-63	<p>The Park Service should not implement any restoration alternatives, because construction will create unsafe conditions and too much noise for local residents.</p>
	<p>Response: During construction, every effort would be made to continue to allow visitor access to existing trails while ensuring the safety of visitors and adjacent residents. Because current public access occurs in specific areas and the rest of the Giacomini Ranch and Olema Marsh are not subject to public or resident access, safety concerns are somewhat reduced. The issue of noise is addressed in the DEIS/EIR in Chapter 4 and elsewhere in this response to comment summary. For most residents, construction noise should not be problematic. For those immediately adjacent to certain construction areas (called sensitive construction zones), construction-related noise impacts could be major or substantial, however, agencies have proposed mitigation measures to reduce them. Please see the revised mitigation measures in Chapter 4, Air Resources – Noise and Soundscapes, of the FEIS/EIR for more detail. On balance, although impacts from construction in some cases would still be considered moderate even with mitigation, they would be temporary and offset, in general, by the major benefits to wildlife, hydrology, vegetation, views, species of special concern, and park visitors that the proposed project would provide.</p>
Restoration Component	
C-64	<p>Concern Statement (Actions to Maximize Tidal Action and the Extent of Tidal Influence): Several commenters discussed the need to maximize tidal action and whether excavation in the southwestern corner of the East Pasture would reasonably achieve this purpose. One commenter felt that the amount of excavation in Alternative D was not excessive. Another felt that it was excessive and that even scaled back excavation in this area should only be performed if the excavation increased the potential for restoring tidal influence into Olema Marsh.</p>
	<p>Response: The agencies do not think that the amount of excavation proposed is excessive. As discussed in several sections of the DEIS/EIR (Chapter 1, Chapter 2, Chapter 3, Geology), elevations within the Giacomini Ranch are much higher than many other diked wetlands within the</p>

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Comment Number	Description of Concern Statement or Comment
	<p>San Francisco Bay region. Most of the pasturelands are at or slightly above what would be called mid-marsh or intertidal elevations. Excavation of the 23 acres proposed in the DEIS/EIR under Alternative D would convert more of the pasturelands that would be exposed to tidal influence during just the higher high tides or only very infrequently to marshlands that would be exposed during average high tide conditions. It would not increase the amount of intertidal mudflat or low marsh.</p> <p>This restoration action would only slightly increase tidal prism within the Giacomini Ranch. As such, its effect on tidal influence in Olema Marsh would also be slight, but it would probably serve to increase salinities within the marsh, if not the volume of tidally influenced waters exchanged between the marsh and Lagunitas Creek or the areal extent of tidal influence within the marsh (G. Kamman, KHE, <i>pers. comm.</i>). Excavation of this component as proposed in the DEIS/EIR would generate approximately 60,000 CY of material. In the FEIS/EIR, this component has been modified slightly to expand the areal extent of excavation (32.5 acres), but maintain the volume of excavated material (up to ~60,000 CY), but generally decreasing the average depth of excavation.</p>
C-65	<p>Concern Statement (Restoration of Olema Marsh and White House Pool County park): Several commenters felt that Levee Road should be replaced or reconstructed to maximize connectivity of the marsh with Lagunitas Creek and the rest of the Project Area. These commenters suggested either replacing the road with a causeway or installing more culverts than proposed. One commenting group felt that, if the high elevations of the White House Pool County park were one of the reasons that Levee Road was not going to be replaced, then the Marin County Parks and Open Space District should reconsider its decision to want to preserve existing conditions of the park, because restoration of the County park could be achieved without losing any value or use of the park. This group felt that this decision should not have been made without public input. Also, this group felt that scraping of the East Pasture of the Giacomini Ranch would have little value -- and possibly a negative impact -- on efforts to restore Olema Marsh.</p>
	<p>Response: In developing possible restoration scenarios for Olema Marsh, the Park Service convened an informal working group with all of the affected land agencies and organizations that included Audubon Canyon Ranch (which owns more than half of Olema Marsh), County of Marin Public Works (which owns and maintains Levee Road), and County of Marin Department of Parks and Open Space District (which leases and manages White House Pool County park). One of the first considerations in looking at options to restore Olema Marsh was existing topography. The Park Service commissioned a topographic survey of Olema Marsh to complement the survey that had already been performed in White House Pool County park and Levee Road by the U.S. Geological Survey. It was immediately evident that elevations throughout the County park were extremely high after years of fill and flood deposition and that they were high enough to invalidate the concept of a causeway without extensive excavation that would be extraordinarily costly, as well as have other environmental impacts. Similar constraints in terms of the amount of excavation, money, and environmental impacts would make restoration of the westernmost Olema Marsh culvert very difficult to implement. This culvert used to be the primary culvert prior to the 1998 flood, but large amounts of sediment deposition have essentially cut it off from the rest of the Olema Marsh and led to formation of a stand of juvenile riparian vegetation.</p> <p>These constraints were the primary factors driving the current restoration approach of using adaptive restoration to implement discrete actions that would or would not at some future point include replacement of the existing culverts for Bear Valley Creek at Levee and Bear Valley Roads. This approach would also help to reduce the severity of some of the negative impacts to the ecosystem that would be expected with an improvement hydrologic connectivity and the elimination of the water impoundment problem and the trend of steadily increasing water levels observed during the last decade.</p> <p>Shallow scraping of the East Pasture in its southern portion is intended only to remove vegetative, cover, and shallow roots of non-native grasses and herbs in a high-elevation upland area where inundation by salty water cannot be used to eliminate these species. It is not expected to have any effect on Olema Marsh.</p>
C-66	<p>Concern Statement (Restoration of Tomasini Creek): Several commenters emphasized the</p>

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	<p>importance of full restoration of Tomasini Creek, but some questioned the approach proposed in the project. At least one felt that the cost to benefit ratio of excavating a new channel was low when it was likely that the creek would move on its own without maintenance of the berm. Another suggested that a causeway be constructed at Mesa Road rather than replacing the culvert as proposed in Alternative D. There was also some concern on at least one commenter's part that restoring hydrologic connectivity by replacing the culvert might actually increase the amount of contaminants that are transported from upstream portions of Tomasini Creek into the restoration area: it might be better to not replace the culverts and instead maximize wetland area for contaminants that do pass through.</p>
	<p>Response: Under Alternative D, the alignment of Tomasini Creek is shifted into roughly what was one of its historic alignments, with the creek running through the center of the so-called Tomasini Triangle and then turning north to flow to Tomales Bay. The Tomasini Triangle is where the freshwater marsh for mitigation of impacts to the federally threatened California red-legged frog would be constructed. Therefore, the creek is aligned to run through the center of the marsh, with low vegetated berms on either side to prevent marsh waters from draining directly into the creek channel, but still allowing overflow into the marsh during high flows. However, commenters are correct that creeks such as Tomasini are dynamic systems and that it is entirely possible that the creek would migrate or jump to a new alignment on its own during a larger storm. When and if it occurs, this would be considered by the agencies to be successful restoration of natural process. Construction of the channel is only intended to give the creek a "starting point" and to foster development of the marsh during its early stages.</p> <p>One of the objectives for the proposed project is to improve the health of Tomales Bay. This includes acting as a filter for pollutants from upstream portions of the watershed. Currently, it is likely that some of the pollutants from the upper portions of the Tomasini Creek watershed have deposited within the somewhat artificially low gradient, depositional reach of Tomasini Creek at Mesa Road, where the undersized existing culverts have reduced hydraulic connectivity with the lower reach and encouraged a backwater effect that encourages sediment – and pollutant – deposition. While ensuring that some of the pollutants do not reach downstream portions of the watershed, this reduced connectivity has reduced other functions, including salmonid passage. Both coho and steelhead salmon have been observed recently within this creek. The appropriate facility for replacing the existing Tomasini Creek culvert would be determined during the final design for this element, which would involve further consultation with the county. It is anticipated that it could be an arched culvert, bridge, or causeway.</p>
C-67	<p>Concern Statement (Creation of Additional Tidal Channels): At least one commenter questioned why the Lagunitas Creek pilot channel included in the central portion of the East Pasture in Alternative C was not included in Alternative D. The commenter also suggested that some additional pilot channels could be created in the southern portion of the East Pasture.</p>
	<p>Response: The agencies have incorporated the pilot channel that was proposed in the DEIS/EIR under Alternative C in Alternative D in the FEIS/EIR. The topography of the Giacomini Ranch, however, restricts the ability to create these channels in the southern portion of the East Pasture, because elevations are extremely high from repeated sediment deposition during flood events (and some fill activities), and these areas function more as floodplains in the current fluvial-dominated environment.</p>
C-68	<p>One commenting organization urged that the scope of the project be expanded and funds set aside for opportunistic replacement of culverts along Project Area perimeter to enhance biological and hydrological connectivity.</p>
	<p>Response: The proposed project incorporates at least three potential replacements of culverts (Levee Road, Bear Valley Road, and Mesa Road) under Alternatives C and/or D. The agencies focused on those they felt posed the most constraint to restoration of natural hydrologic and ecological processes and functions. The Park Service would be interested in working with the County of Marin Public Works should the county identify other culverts that it owns and maintains on the project perimeter for replacement.</p>
C-69	<p>The Park Service should remove the 1983 rip-rap along Lagunitas Creek because it was installed</p>

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	immediately after a large flood and had the effect of unnaturally forcing the stream into an old alignment.
	Response: This action is included under Alternatives B-D of the DEIS/EIR.
C-70	What are the plans for removal or retention of Waldo's Dike?
	Response: In Chapter 2 of the DEIS/EIR, the document describes that the north levee of the West Pasture, which is also known as Waldo's Dike, would remain under the No Action Alternative and Alternative A and be removed under Alternatives B-D.
C-71	Will the tidegates on Fish Hatchery Creek be removed?
	Response: As noted above, the north levee of the West Pasture and the Fish Hatchery Creek tidegate would remain under the No Action Alternative and Alternative A and be removed under Alternatives B-D. The tidegate and flashboard dam structure on Tomasini Creek would be retained under all alternatives for at least 10- to 15 years until alternate habitat for the federally endangered tidewater goby (<i>Eucyclogobius newberryi</i>) has expanded within the restored marsh. Tomasini Creek is home to one of the largest occurrences of tidewater goby in the Project Area and Tomales Bay watershed.
C-72	The Project's first priority, and first action, should be to remove the northern levee on the West Pasture.
	Response: The agencies have put together a preliminary of restoration tasks that would be completed during the two separate years of project implementation, but, ultimately, the order in which tasks would be completed would be worked out with the construction contractor and would be based on a number of factors, including prohibitions on construction in the vicinity of clapper rail and black rail habitat during the breeding season.
C-73	The EIS/R conclusion that the restored wetlands will remove 2-18% of the pollutants entering the Project Area seems low; the Park Service should configure the wetland restoration project to maximize pollutant uptake efficiency.
	Response: While the Park Service believes that water quality improvement could be one of the most important functions that could be restored with the proposed project, the intent of the proposed project is not to create a so-called treatment wetland, but to remove impediments to natural hydrologic and ecological processes that would promote a number of hydrologic and ecological functions, including habitat and support for wildlife, habitat for rare plants, and floodwater retention and dissipation of the erosive energy of flood flows. The estimates of removal for pollutants, which have been refined in Chapter 4 of the FEIS/EIR, refer specifically to those conveyed downstream by Lagunitas Creek and its tributaries and are based on hydraulic modeling estimations of overbank flooding rates during some of the more frequent flood events. These numbers do not take into account removal of pollutants that are conveyed by other sources and that might have higher rates of retention within the Project Area. These would include Tomasini Creek, Fish Hatchery Creek, other small West Pasture drainages, stormwater run-off that flows into the Giacomini Ranch from the town of Point Reyes Station, and potentially septic-influenced groundwater inflows.
C-74	Concern Statement (Creation of Additional Upland Refugia): Commenters suggested that the agencies incorporate more high tide refugia for special status species by reusing more of the excavated soils or leaving more portions of the levees as "islands."
	Response: The agencies have incorporated this idea under Alternatives B-D by extending the high tide refugia area that was created as part of a 2006 enhancement project southward. See Chapter 2 of the FEIS/EIR for additional detail. Additional refugia would continue to exist in the East Pasture at the Tomasini Triangle created freshwater marsh retention berm and on the Tomasini Creek berm, which would not be removed, but allowed to deteriorate over time.
C-75	Concern Statement (Restoration of Additional Areas, Including Along C Street): The scope of restoration component should be expanded to include more lands along C Street in Point Reyes Station and along the margin of the West Pasture. Lands proposed for exchange as part of a separate

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Comment Number	Description of Concern Statement or Comment
	<p>project should be retained (see Cumulative Effects analysis in Chapter 4), and the agencies should acquire additional lands that are either owned by the Giacomini family or potentially other private landowners. At least one commenter noted that water from small creeks that were buried as part of development of Point Reyes Station flows into the cattle corrals along C Street and that there is a potential to use this hydrology to expand the growth of willows along the Mesa perimeter. Also, one commenter requested that the agencies discuss with the County the potential of removing the Cypress trees that were planted by the County to obscure views of the loafing barn on the dairy.</p>
	<p>Response: The Park Service’s MOU with CalTrans calls for a restoration of a significant portion of the Giacomini Ranch. However, it does not call for restoration of the entire ranch. In developing the proposed project, the planning team focused its efforts on where it felt that money available for restoration could yield the most ecological benefit. For the most part, these were areas in the low-lying pastures or former historic coastal marsh areas that are not directly adjacent to existing residential, commercial, and agricultural development and areas that have not been subject to intensive historic impacts such as repeated fill events that would require extensive excavation and rehabilitation before they could be considered “restored.” For this reason, the agencies elected not to focus their restoration efforts on the dairy facility parcels along C Street in Point Reyes Station. They have been subject to repeated fill activities and disturbance from dairy activities. They are also directly adjacent to the town of Point Reyes Station, which would increase the likelihood of wildlife disturbance from people and domestic and feral animals. These were some of the reasons that the Park Service elected to enter discussions with the Giacomini family to exchange some of the higher-elevation C Street parcels for low-lying pasturelands that were considered to have more existing ecological value. This is a separate project that is discussed in the DEIS/EIR under Cumulative Impacts in Chapter 4. Until the fate of this proposed project is determined, the Park Service has no plans to remove the stand or row of Cypress trees along C Street, nor is it aware of any such plans by the county.</p>
C-76	<p>Restoration actions should proceed slowly for the protection of plants and animals.</p>
	<p>Response: For most alternatives, construction activities would be phased over two (2) seasons. Construction can occur within the pastures while levees remain but once the levees are breached or removed, the difficulty of performing construction in many areas would increase considerably and make it logistically complex, if not infeasible. Therefore, restoration activities cannot be feasibly implemented over a longer period of time. Because the agencies are restricting excavation to removal of levees, berms, manure-laden or “hot” soils, and weedy upland areas, most of the pastures would be expected to convert from non-native grass- and herb-dominated grasslands to a mosaic of native-dominated salt, brackish, and freshwater marsh slowly. As discussed in the DEIS/EIR under Chapter 4, Vegetation Resources, this transitional period in which grasses are slowly killed off by higher salinities and replaced by disturbance-adapted brackish and eventually salt marsh species could take as long as 10- to 15 years, although shifts in some systems have occurred as rapidly as 5 years.</p>
C-77	<p>The Park Service should quickly and thoroughly revegetate the Project Area after excavation.</p>
	<p>Response: Please see response to C-76 above. Restoration would not involve removal of vegetation cover except under Alternatives C and D in the southern portion of the East Pasture. Grassland vegetation would persist for a number of years as increased tidal influence slowly replaces salt-intolerant or marginally tolerant species with disturbance-adapted brackish marsh and, eventually in most areas, salt marsh species. Active revegetation is typically not considered necessary in areas where natural colonization would be expected to proceed quickly because of abundant seed and propagule sources and appropriate establishment environments and where non-native species are not expected to readily outcompete and exclude native species. For this reason, active revegetation is only planned for higher elevation and more disturbed areas where establishment environments are not conducive to natural community establishment, and non-native invasive species would be likely to outcompete native vegetation. These areas include high-elevation riparian floodplain terraces, high marsh/upland ecotone, dry upland grassland, and excavated and created areas.</p>
C-78	<p>In Alternative D, what is the purpose of constructing a "fence to limit cattle access" in the West Pasture if there will be no cattle grazing within the Project Area?</p>

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	<p>Response: Under Alternative B in Chapter 2 of the DEIS/EIR, it notes that the Park Service earlier constructed a fence to limit cattle access to the 100-acre portion of the Giacomini Ranch in the West Pasture that has been owned and managed by the Park Service while the Reservation of Use Agreement with the Giacomini Ranch is still in effect. Under the Reservation of Use agreement, the Giacominis have continued to graze cows in the West Pasture, and this fence was built to preclude cattle from entering areas in the 100-acre portion of the pasture that had been enhanced through creation of freshwater marsh and high tide refugia. One of the actions under Alternatives B-D is to remove that fence. Under Alternative D, the Park Service proposes to construct a different fence to limit cattle access to the portion of the Point Reyes Mesa on the Martinelli Ranch that is directly northeast of the Giacomini Ranch, because this area could act as aestivation or breeding habitat for the northwestern pond turtle. The Martinelli family has a Reservation of Use agreement with the Park Service for beef cattle grazing on the Martinelli Ranch that extends through 2012.</p>
C-79	<p>The Park Service should remove abandoned structures and equipment within and adjacent to the Project Area.</p>
	<p>Response: As described in Chapter 2 under Alternatives A and B, the agencies have incorporated removal of agricultural infrastructure as one of the restoration components. Additional infrastructure adjacent to the Giacomini Hunt Lodge that could extend onto private property would also be removed and is described in Chapter 2, Actions Common to All Alternatives.</p>
C-80	<p>The Park Service should remove infrastructure, pipelines, and electrical wiring from the privately owned lands adjacent to the Giacomini Hunt Lodge.</p>
	<p>Response: This action has been incorporated as an alternative element common to all alternatives in Chapter 2 of the FEIS/EIR.</p>
Public Access - General	
C-81	<p>The DEIS/R is inadequate because it does not conclude that the restoration project must include installation of transportation corridors on the margins of the Project Area.</p>
	<p>Response: We disagree and note that relevant plans for jurisdiction on the margin of the Project Area do not require such corridors. Instead, the draft Marin Countywide Plan (Marin County Community Development Agency 2005), the Marin County Unincorporated Area Bicycle and Pedestrian Master Plan (Alta Transportation Consulting 2001), the Local Coastal Plan (Marin County Comprehensive Planning Department 1981), and the Point Reyes Station Community Plan (Marin County Community Development Agency 2001), recommend development of additional trails and bike paths in the Point Reyes Station-Inverness area, specifically along Sir Francis Drake Boulevard and the railroad right-of-way "where feasible" (Alta Transportation Consulting 2001). The LCP notes that recreational resources should be incorporated where "consistent with the protection of natural resources and agriculture" (Marin County Comprehensive Planning Department 1981). The LCP also directs federal parks to provide access "where feasible and where consistent with the protection of the parks' natural resources" (Marin County Comprehensive Planning Department 1981). Projects should "avoid or minimize disturbance to wetlands, necessary buffer areas, and associated important wildlife habitat" (Marin County Comprehensive Planning Department 1981).</p>
C-82	<p>Local, state, and federal managers should consider building additional trails, such as a trail between the Green Bridge and White House Pool via Levee Road, or along the railroad grade.</p>
	<p>Response: Please also see response to C-39. In the DEIS/EIR, a trail along the railroad grade is considered under Alternatives A and B. A trail between the Green Bridge and White House Pool via Levee Road was originally incorporated into Alternative D, but was eliminated on the basis of public comment from the final alternative design and is referenced under Eliminated Alternatives in Chapter 2. Since then, a considerable amount of local community members appear to support a trail in this location. This alternative will not be addressed at a project-level in the FEIS/EIR, but the agencies would entertain working with the County of Marin, which owns and maintains the Green Bridge and Levee Road, to develop some type of southern perimeter trail system.</p>

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Comment Number	Description of Concern Statement or Comment
C-83	<p>Concern Statement (Extension of Southern Perimeter Trail to North Levee or Inverness): The Project should extend the western portion of the Southern Perimeter Trail to the northern end of the Project Area and/or to Railroad Point to encourage hiking. One commenter suggested that extension of the Southern Perimeter Trail to Inverness be considered now rather than later, because construction of the trail could utilize some of the fill being created by excavation in the Giacomini Ranch.</p>
	<p>Response: As noted under C-82, a trail along the railroad grade to Railroad Point is considered under Alternatives A and B in the DEIS/EIR. The agencies have also proposed a programmatic component that would explore extending the southern perimeter trail to Inverness Park under Alternatives A-C. As part of some earlier public access studies, the agencies did evaluate extending the trail as far north as Drakes View Drive. However, routing of the trail near the Lucchesi/Kostelic residences poses some considerable technical challenges, because of the proximity of the road to the property boundaries and the difficulties in routing trails behind the residences because of the 1906 Drainage. This is discussed in the DEIS/EIR in Chapter 2 under Alternatives Eliminated.</p>
C-84	<p>The Park Service should retain at least a portion of the north levee on the West Pasture as public access.</p>
	<p>Response: The agencies feel that it is important to eliminate the north levee of the West Pasture for a number of reasons. First, levees that are perpendicular to the primary flow path are some of the largest impediments to hydrologic processes. Secondly, public access on the levees during extreme high and storm tides could be jeopardizing the population of state-threatened California black rails (<i>Laterallus jamaicensis coturniculus</i>) that lives in the undiked marsh north of Giacomini Ranch and that uses the levee for high tide refugia during those periods. The presence of people limits the amount of area available for rails to use and may increase their susceptibility to predation. With elimination of most of the levee, the amount of habitat for black rails and the federally endangered California clapper rails (<i>Rallus longirostris obsoletus</i>) would expand southward and increase considerably. The retention of some of the north-south trending or levees parallel to Lagunitas Creek would retain higher elevation areas necessary for refuge during high tides.</p>
C-85	<p>Maximize opportunities to create multi-use pathways that are not adjacent to roads.</p>
	<p>Response: The agencies have incorporated, where possible, pathways that are not adjacent to roads. However, efforts to incorporate restoration- and resource-compatible access opportunities are complicated by the fact that wetlands and riparian areas extend right up to the edge of roads. Under all of the action alternatives, the Park Service has retained most or all of the existing East Pasture trail (and adjacent Green Bridge County park trails), and, under Alternatives A-C, this is linked via a bridge to White House Pool County park trails. The bridge has been eliminated from project-level consideration under Alternative D in this document, because it was felt that more restoration-compatible alternatives for creating a southern perimeter trail system should be explored first. The issue of intended users is addressed below under C-89.</p>
C-86	<p>Concern Statement (Overlooks in Public Access Component): The public access components should be focused on observation points such as viewing areas. At least one commenter felt that these observation points should be located away from residential areas.</p>
	<p>Response: The agencies have incorporated viewing and overlook areas at select locations along the Project Area perimeter where they believe that visitors and residents could have unique views of the restored wetland. These receive the most focus under Alternative D, because it does not offer a through-trail component in the Giacomini Ranch. Because residential areas surround the Project Area, it is impossible to locate viewing areas completely away from them, but the agencies believe that they have sited them in areas that provide the least disturbance to adjacent residents.</p>
C-87	<p>Concern Statement (Educational Opportunities): Several commenters encouraged the agencies to expand educational opportunities through public access or interpretative displays. At least one commenter suggested that the agencies should retain one of the houses now owned by the Park</p>

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Comment Number	Description of Concern Statement or Comment
	Service in Inverness Park as an educational or interpretation facility.
	Response: The agencies are very interested in incorporating educational and interpretative opportunities through not only exhibits at viewing and overlook areas, but through programs offered through the Seashore's Interpretation Division. The house in Inverness Park has been badly damaged from years of occupancy by Giacomini Ranch workers and would require a considerable investment to allow it to be used as an educational or interpretation facility. Therefore, it is unlikely that the re-use proposed by the commenter would take place.
C-88	Concern Statement (Width, Surfacing, and Fencing of Trails): Several commenters made suggestions on the types of trails or trail surfacing and fencing that should be incorporated as part of the public access component. A few commenters felt that trails should remain unimproved or be simply modest, non-vehicular trails that would appeal mainly to birdwatchers and walkers. Another felt that the trails should be surfaced with decomposed granite treated with a pine resin binder. Other commenters felt that measures should be taken to protect adjacent natural areas, either through fencing or perhaps preferably vegetative barriers that would enhance scenic views. The County of Marin requested that trails be of sufficient space and surfacing to allow all-weather access. However, one commenter requested that the County of Marin follow the Park Service lead in creating trails that are not too wide and that are environmentally sensitive.
	Response: During public access workshops, one of the most consistent comments received from members of the public regarding trails in the Project Area was that they not be paved, but be left as earthen or constructed of decomposed granite. Members of the local community felt that this would help to retain the rural character of the region. The agencies have considered a variety of surfacing approaches, including earthen, decomposed granite, decomposed granite with pine resin binder, and boardwalks. The exact surfacing to be used would be decided during final design, but no paved trails would be constructed within Park Service-owned lands. Split-rail fencing and vegetative barriers would be incorporated in certain areas to ensure that people stay on trails and out of restored areas.
C-89	Concern Statement (Intended Trail Use): Several commenters discussed the need for having public access that serves a variety of users, including pedestrians, bicyclists, and equestrians. There was one request for more clarification on the intended users for the various public access facilities proposed.
	Response: The agencies intend for all trails proposed within the Project Area to be multi-use or serve a variety of users, with the exception of the West Pasture north levee trail under the No Action Alternative and Alternative, which would be restricted to hikers. This is addressed in Chapter 4, Visitor and Resident Experience – Public Access Resources, and is clarified in Chapter 2 of the FEIS/EIR under the description of the public access components.
C-90	Concern Statement (Parking): Many commenters took issue with the proposal to create a small (~ 5-car) parking area in the gravel lot off Mesa Road currently used by a gardening company for equipment storage for a number of reasons, including impacts to vegetation resources, wildlife, traffic, parking, public safety, noise, and other issues (See Concern Statement: Public Access - East for more detail). At least one commenter said that Alternative C was not preferable, because it created new parking areas. The Park Service should not create a trailhead in Point Reyes Station without providing adequate parking. Another felt that creation of a new parking area was not necessary, because there was already adequate parking at the elementary school on weekends and that additional parking is being created at the ecumenical housing site. Others suggested that the proposed parking area be moved either closer to town or onto Park Service lands within the Giacomini Ranch.
	Response: The agencies do not believe that conversion of the small gravel lot currently being used by a gardening company for storage of vehicles and equipment would cause impacts to vegetation resources, wildlife habitats, or wildlife, because it is currently a disturbed area. It is also distant enough from town that it is unlikely that it would be used by visitors to town as overflow parking. Most of the people parking there would be people using the some of the Eastern Perimeter facilities proposed. Impacts from visitation on traffic and noise are addressed in Chapter 4 of the DEIS/EIR under the relevant sections – Air Resources – Noise and Soundscapes

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Comment Number	Description of Concern Statement or Comment
	<p>and Public Services – Traffic and Transportation. Based on the analysis in the DEIS/EIR under Public Services – Traffic and Transportation/Parking, increased visitation that results from construction of public access facilities would cause no more than a minor impact in parking demand, and this minor impact would be reduced to negligible under Alternatives C and D when the Point Reyes Station trailhead is shifted from Third and C Street to the Green Bridge at State Route 1. In terms of moving the parking area, most of the Giacomini Ranch lands are either wetland or riparian area or are immediately adjacent to residences and would create potentially greater impacts.</p>
C-91	<p>Concern Statement (Public Access and County Involvement): Several commenters felt that design, funding, and maintenance for public pathways should be undertaken jointly by the Park Service and the County of Marin. At least one commenting organization faulted the DEIS/EIR for not studying or encouraging better coordination between the Park Service, the County of Marin, and the Wildlife Conservation Board, which owns the lands that the County leases for White House Pool and Green Bridge County parks. As part of this coordination, several commenters felt that the agencies should cooperate to make signage, maintenance, and rules along the Southern Perimeter Trail generally consistent between Park Service and County-managed lands. At least one commenting organization felt that the two agencies should coordinate to make a coherent set of viewing areas so impacts to wildlife from viewing are not increased. The County of Marin commented that there was no agreement as to the division of maintenance responsibilities for trails that may exist or be built in the right-of-way and that it has not budgeted for any potential capital expenditures.</p>
	<p>Response: The agencies agree that certain aspects of the public access components, specifically the southern perimeter trail system, are projects that necessitate inter-agency involvement and cooperation. However, we have come to recognize that this is not the right time – or this EIS/EIR, the right vehicle – to plan for this trail system. The agencies base this conclusion on recent comments submitted by the public, which show that opinion has changed dramatically regarding the use of a bridge versus use of Levee Road, as well as on comments by public agencies that suggest that further planning and coordination efforts are needed between the Park Service and the County. Based on these comments, it would appear that the southern perimeter trail system is not “ripe for decision.” Under NEPA, one of the determinants of whether an applicant has a project is whether it has an action that is “ripe for decision.” When all involved agencies and the public agree that it is time to move forward on planning, the Park Service would be committed to working on expanding public access facilities on the southern perimeter of the Project Area. This cooperative project would enable better planning of viewing areas and maintenance responsibilities. (It should be noted that the current DEIS/EIR does not include any trails in County right-of-ways, although the programmatic component proposed between the Park Service and County could include a trail along Sir Francis Drake Boulevard.)</p> <p>One of the options that could be reevaluated under this cooperative project would siting of a trail along Levee Road to the Green Bridge, where it could connect to the enhanced Green Bridge County park trail entrance proposed under Alternatives C-D. It could also include the extension to Inverness Park discussed programmatic in the DEIS/EIR under Alternatives A-C. Because this path would be entirely within the County right-of-way, it would be appropriate for the County to take the lead. The Park Service would commit to working with the County 1) on portions where the trail enters or abuts Park Service lands and 2) on raising the necessary funding. Another option would be to construct a bridge at the location of the old summer dam as is proposed currently under Alternatives A-C. However, should any of these options be chosen, a separate environmental compliance process would be required, as this component is only addressed as a future potential project under Alternative D.</p>
C-92	<p>Funding for the public access components of the project should be secured simultaneously with funding for ecological restoration components of the project.</p>
	<p>Response: The agencies were not able to secure funds simultaneously for restoration and public access components, because public access components required additional baseline studies and public scoping efforts that delayed finalization of design relative to restoration components. In addition, many of the sources that are willing to fund restoration do not also fund public access, so the agencies have to pursue different types of federal and private funding sources.</p>

TABLE 103. COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD FOR GIACOMINI WETLAND RESTORATION PROJECT AND RESPONSE FROM LEAD AGENCIES	
Comment Number	Description of Concern Statement or Comment
Public Access - ADA	
C-93	<p>Concern Statement (Public Access and ADA Components): Several commenters discussed the inclusion of accessible or ADA-compliant trails as part of the public access components. At least one commenter felt that Alternative D was not adequate, because it had failed to provide an ADA-compliant trail, and an ADA-compliant trail could be incorporated without compromising the environmental benefits of this alternative. Several commenters felt that the ADA-compliant pathway for all alternatives should be the one included in Alternatives A and B, which originated from C Street rather than being a spur trail originating from Mesa Road as proposed in Alternative C. Other commenters suggested that ADA-compliant access be provided at White House Pool County park, Olema Marsh, or Martinelli Open Space.</p>
	<p>Response: Topographic constraints for the trails incorporated under Alternative D had limited the agencies' ability to incorporate an ADA-compliant trail in this alternative. Strenuous objections by adjacent residents to the continued presence of a trailhead in the vicinity of 3rd and C Streets has pushed the planning team to incorporate a new Point Reyes Station trailhead at the Green Bridge and State Route 1 under Alternatives C and D, and this entrance is very steep and not suitable for ADA access. The Park Service explored other options on C Street, but they were not feasible. After subsequent discussions with County Parks and Open Space District, the Park Service has incorporated an ADA-compliant component at White House Pool County park under Alternative D in the FEIS/EIR. Further detail on this component can be found in Chapter 2 of the FEIS/EIR.</p>
Public Access - Bridge	
C-94	<p>Concern Statement (A Bridge Should or Should Not be Constructed): Many commenters stressed the importance of incorporating a bridge across Lagunitas Creek as part of the public access component. They felt that it was a high priority and should be built as soon as possible, because it would increase public safety, allow people to enjoy the restored wetlands, and reduce vehicular traffic. One commenter suggested that the bridge be named the "Sis Arndt Memorial" Bridge.</p> <p>Other commenters stressed the importance of eliminating the bridge from the public access component. They felt that it was not desirable, because it would disturb wildlife by increasing human activities or would impact the existing visitor experience. Some felt that it was not worth the expense, because it would not create a through-trail.</p> <p>There was a concern that the bridge is too costly to build and/or maintain. Some felt that this was a reason not to build a bridge; others suggested that the agencies either build a less substantial bridge or install a seasonal bridge. Another commenter felt that the main objection to building the bridge was its cost and that the agencies should raise additional funds and thereby eliminate this objection.</p>
	<p>Response: As the bridge is incorporated under Alternatives A-C, both the advantages and disadvantages of the bridge are addressed in Chapter 4 under various resource topics, including Fish and Wildlife Resources, Visitor and Resident Experience – Public Access Resources and Visual Resources, Vegetation Resources, Air Resources – Noise and Soundscapes, and Public Services – Traffic and Transportation. The topic of public safety is addressed in greater detail in Public Access resources section of the FEIS/EIR than it was under the DEIS/EIR, because of the number or comments relating to public safety received during the public comment period. While the bridge would not create a complete through-trail, it would offer greater connectivity. However, because it is impossible to determine how many people would not drive because of the presence of a bridge, the environmental document does NOT assume that incorporation of a bridge would reduce traffic, although it is possible that it might.</p> <p>The planning team did explore lower cost and seasonal options for a bridge, but concluded that a pre-fabricated bridge was best, because it is actually less costly to design and install than a designed bridge. Based on the issues expressed in C-3, C-14, C-15, and C-22, the main objection by the public to the bridge is its impact on natural resources such as wildlife, riparian habitat, and viewscales and other environmental issues such as traffic, air pollution, and character of the local community, not the expense. Therefore, raising additional funds is not likely to eliminate these concerns. Any naming of bridges would probably occur during the final design phase at which time suggestions would be considered.</p>

TABLE 103. COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD FOR GIACOMINI WETLAND RESTORATION PROJECT AND RESPONSE FROM LEAD AGENCIES

Comment Number	Description of Concern Statement or Comment
Public Access - Dog	
C-95	<p>Concern Statement (Dog Policies in Project Area and Adjacent County Parks): Many commenters addressed the topic of dogs and whether dogs would be permitted in the Project Area. Several felt that access for dogs -- and possibly other domesticated animals -- should not be allowed or at least limited, because dogs disturb wildlife. Even if leash policies are instituted, one commenter noted that dogs-on-leash policies are often not enforced, so owners allow dogs to run off-leash. Several other commenters felt that dog walking should be allowed within the Project Area. Some felt that dogs should be allowed to walk and run off-leash. Another commenter suggested that, to accommodate both ecological restoration and community needs, the agencies should fence off a portion of the Project Area as an off-leash dog recreation area. There was also concern from some people about how the proposed project would affect dog policies in the County parks, with people wanting to maintain the existing policy of allowing people to walk dogs in those areas.</p>
	<p>Response: The issue of whether dogs would be allowed on Park Service-owned lands in the Project Area is clarified in Chapter 2 of the FEIS/EIR. To summarize, dogs would not be allowed in any areas where they are not currently allowed. This would include all of the restored wetland and grassland areas that are not designated trails. It would also include the Eastern Perimeter through-trail and spur trails included under Alternatives A-C, because these areas have not been open to the public. Dogs are also currently not allowed on the Tomales Bay Trail. Under the No Action Alternative and Alternative A, dogs would not be allowed on the north levee of the West Pasture, because of the trail's proximity to habitat for federally and state listed California clapper rail (<i>Rallus longirostris obsoletus</i>; FE, SE) and California black rail (<i>Laterallus jamaicensis coturniculus</i>; ST).</p> <p>Because the Southern Perimeter spur trail is connected to the Green Bridge County park, which allows dogs, dog use would continue to be allowed on the Southern Perimeter through- and spur-trail components. All dogs would be required to be on a 6-foot leash at all times (36CFR 2.15 (a) 2), and owners would be subject to fines for off-leash dogs. However, if at some point in the future dogs are determined to be negatively impact wildlife, including nesting or special status wildlife species, the area could be closed to dog walking altogether through the Superintendent's Compendium process (36CFR 2.15 (a) 1). In general, dogs would continue to be allowed in County park areas subject to current and future county policies.</p>
Public Access - East	
C-96	<p>Concern Statement (There Should Be No Trails or Parking Areas on Eastern Perimeter): Many commenters felt that no public access should be constructed on at least the southern portions of the eastern perimeter of the Project Area. Most of these comments focused on the Mesa Road spur trail and parking area, because these were the primary components included in the preferred alternative, although most applied to construction of any trail on the railroad grade. Commenters indicated that they believed that public access facilities would significantly alter the quality of life for Point Reyes Mesa residents by increasing noise, traffic congestion on Mesa Road, threats to public safety on Mesa Road, and the potential for vandalism, arson, brawls, human waste, and fire and that these factors could lead to decreases in local property values. Others felt that the facilities would degrade natural systems and wildlife habitat, including riparian habitat (See Impact Analysis section). Some commenters questioned the value of having public access facilities in this area, because there would be no through-trail (at least in Alternatives C and D), and few people would use the trail, making the costs higher than the benefits offered.</p>
	<p>Response: The agencies included a trail on the eastern perimeter, because considerable interest has been expressed in having public access on the historic railroad grade both prior to initiation of and during scoping for the proposed project. As with other components, the agencies attempted to create a range of actions on the eastern perimeter from a through-trail with a small parking lot and two viewing areas under Alternatives A and B to a simple spur trail and viewing area the Tomales Bay Trail under Alternative D. The agencies believe that the potential impacts of incorporating public access on the eastern perimeter of the Giacomini Ranch raised by commenters have been, for the most part, adequately addressed in the DEIS/EIR under a variety of resource topics, including Air Resources-Noise, Public Services-Traffic and Transportation, Vegetation Resources, and Fish and Wildlife Resources. Additional information regarding public</p>

TABLE 103. COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD FOR GIACOMINI WETLAND RESTORATION PROJECT AND RESPONSE FROM LEAD AGENCIES

Comment Number	Description of Concern Statement or Comment
	<p>safety has been added to the FEIS/EIR under Visitor and Resident Experience – Public Access Resources. Construction of public access features such as trailheads would be expected to have no more than a minor adverse impact under Alternatives A and B – and negligible impacts under Alternatives C and D -- on public safety in this area relative to existing conditions. The project planning team felt that spur trails would still offer public access benefits, even if fewer people used the trail.</p>
C-97	<p>Concern Statement (There Should Be Trails on Eastern Perimeter): In contrast to C-96, several commenters supported creation of a trail on the eastern perimeter of the Project Area. Some supported the idea that this trail could be linked in the future to other portions of the historic railroad grade, providing a much more complete public access system. Another felt that the trail should be unimproved and for foot traffic only. One commenter requested that the agencies evaluate combining a through-trail public access option with full restoration of the rest of the Project Area and indicated that the benefits of such an option were not adequately discussed in the EIS/EIR, including potential benefits to public safety of the through-trail. Also, the discussion was inadequate because the document did not cite any authors or experts that supported creation of a trail on the railroad grade.</p>
	<p>Response: The agencies believe that the benefits of having a through-trail are adequately addressed in the DEIS/EIR under Visitor and Resident Experience – Public Access Resources and under Public Services – Traffic and Transportation/Alternative Transportation. As discussed under CS-96, the agencies attempted to create a range of actions on the eastern perimeter and did examine a through-trail option, as well, under Alternatives A and B. The planning team did not incorporate an eastern perimeter through-trail option with full or extensive restoration of the Giacomini Ranch and Olema Marsh under Alternatives C and D, because it was felt that this element was incompatible with full or extensive restoration. It would involve both permanent and temporary removal of riparian vegetation, would permanently impact wetlands that are subject to the jurisdiction of the U.S. Army Corps of Engineers, and would negatively affect both directly and indirectly important wildlife habitat for special status species such as the federally endangered tidewater goby (<i>Eucyclogobius newberryi</i>), the federally endangered central California coast coho salmon (<i>Oncorhynchus kisutch</i>), the federally threatened central California coastal steelhead (<i>Oncorhynchus mykiss</i>), and the state and regional federal species of special concern saltmarsh common yellowthroat (<i>Geothlypis trichas sinuosa</i>). In addition, it could potentially violate the Streamside Conservation Act policies of the Local Coastal Plan (LCP; Marin County Comprehensive Planning Department 1981) and the Point Reyes Mesa buffer protection policies of the LCP and the Point Reyes Station Community Plan (Marin County Community Development Agency 2001). Likewise, the planning team was concerned that creating an unimproved trail would only result eventually in larger impacts to the resources through unofficial widening of the trail. Obviously, larger benefits to alternative transportation would come from a longer through-trail option that would link to other portions of the historic railroad grade. These portions of the railroad grade are outside of the scope of the Project Area and the proposed project. The Park Service has explored in the past the potential for purchasing other lands that incorporate the historic railroad grade, but were unable to reach agreement with the owners.</p> <p>The through-trail under Alternatives A and B was intended to serve walkers, bikers, and equestrians, although, because of the resource values in this area and the fact that it has not been previously open to dogs, dog-walking would not be allowed.</p>
C-98	<p>If the Park Service constructs a trail and parking area on the eastern border of the property, they should construct a sidewalk along Mesa Road to protect non-vehicular traffic.</p>
	<p>Response: Because of the community's interest in preserving the rural character of the local communities, the agencies have attempted to avoid creating new paved areas for trails, parking, or sidewalks. Mesa Road offers very little opportunity for creation of a sidewalk due to the presence of wetlands, riparian habitats, streams, and the proximity of private property lines and fences to the road or lack of road shoulder in many areas. One of the reasons that the agencies included a small gravel parking lot at the trailhead for the Eastern Perimeter facilities was to specifically not encourage walking along Mesa Road, which currently has very little shoulder available for placement of a formal sidewalk or even unpaved footpath. Under Alternative D, there are no public access facilities off Mesa Road under Alternative D. Under Alternative C, it is</p>

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Comment Number	Description of Concern Statement or Comment
	<p>unlikely that the Mesa Road spur trail would create enough foot and bike traffic between downtown Point Reyes Station and the trailhead to create a safety problem and warrant inclusion of a formal, paved sidewalk. However, under Alternatives A and B, the through-trail facilities could increase foot and bike traffic from the downtown area of Point Reyes Station. However, impacts to public safety would be considered no more than minor adverse relative to existing conditions. Should these alternatives be implemented, the Park Service may install signage at the trailhead to warn trail users that those walking along Mesa Road do so at their own risk.</p>
C-99	<p>Concern Statement (Better Town Access to Martinelli Ranch): One commenting organization suggested that the park try to find better town access to the Martinelli Ranch by securing an access easement from one of the property owners on the south boundary and/or constructing a gate at the southeast corner.</p>
	<p>Response: The Park Service would be potentially interested in pursuing this in the future.</p>
<p>Public Access - South</p>	
C-100	<p>The DEIS/EIR identified a southern perimeter trail from a proposed bridge across Lagunitas Creek to White House Pool park. No specifics were provided on the exact alignment and whether the pathway is supposed to be inside or outside of the county right-of-way. Please provide details in the environmental document.</p>
	<p>Response: The agencies included graphics in the DEIS/EIR (Figure 7, 12, and 15) that shows the alignment of the Southern Perimeter Trail proposed under Alternatives A-C. This graphic illustrates the proposed alignment and shows that the pathway does not fall within the right-of-way for any County of Marin roads. The document also discusses a programmatic component that would potentially extend the Southern Perimeter Trail from White House Pool County park to Inverness Park in a collaborative project with the County of Marin (Figures 7, 12, and 15). This component would potentially fall within a County right-of-way for Sir Francis Drake Boulevard. Because this extension is being discussed in this document only as a possible future extension of the proposed trail, it is treated more generally or programmatically, because the decision on whether or how to proceed is not yet "ripe for decision." Specific alignments and other design details would be decided with the help of future technical study and design and additional environmental analysis and public input through a future NEPA and CEQA process.</p>
C-101	<p>Concern Statement (Support for and Suggested General Modifications to Southern Perimeter Trail System): Several people expressed support for the Southern Perimeter Trail, stating that it would not unacceptably degrade natural resources and that the agencies should provide safe alternatives for non-vehicular traffic between Inverness Park and Point Reyes Station. Several other commenting individuals and agencies had suggested modifications to the proposed through-trail, including: 1) constructing the trail as a Class I pathway and paving it; 2) not creating a trail for weekend bicycle riders; 3) creating public access at Olema Marsh; 4) constructing a sidewalk along C Street to connect the Project Area to Highway 1; and 5) maintaining a bridge near White House Pool County park parking lot as part of the trail system.</p>
	<p>Response:</p> <p>1 and 2) During public access workshops conducted in 2005, members of the local community and general public expressed a strong preference for not creating paved paths within the Project Area. The belief was that paved paths would alter the rural character or nature of the local communities. Without paving, public access facilities would be unlikely to attract road cyclists, which is discussed in the DEIS/EIR.</p> <p>3) The agencies have discussed connecting the southern perimeter trail system proposed under Alternatives A-C with the Olema Marsh trail with a crosswalk across Levee Road, however, this would require further traffic analysis and consultation with and approval by the County of Marin Department of Public Works before it could be implemented.</p> <p>4) As noted under C-88, the agencies have attempted to minimize the amount of paved infrastructure constructed as part of the proposed project. Connection of C Street with State Route 1 would actually require sidewalks to be constructed along 3rd Street and B Street. Under Alternatives A and B, C Street would be connected to State Route 1 through the Green Bridge County park. C Street access would be eliminated under Alternatives C-D, which would negate</p>

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	<p>the need for a sidewalk under these alternatives.</p> <p>5) There would be no plans to alter or remove this bridge under any of the alternatives.</p>
C-102	<p>Concern Statement (Southern Perimeter and Access from C or B Streets): Several commenting individuals and agencies suggested that the Southern Perimeter Trail should include access from C Street in all alternatives, not just in Alternatives A and B. Several trailhead locations were suggested, including the trailhead at 3rd Street as well as one at Fourth Street. Conversely, other commenters noted that the agencies should avoid maintaining a trailhead at 3rd Street, because it would unacceptably increase the amount of vehicle traffic and create parking problems. At least one commenter suggested that the agencies explore the potential of creating a parking lot and trailhead at the corner of B Street and Highway 1 to avoid increases in traffic and parking problems on 3rd Street.</p>
	<p>Response: The existing trailhead for the informal trail on the Giacomini Ranch’s East Pasture levee is located at Third and C Streets. As noted under C-93, strenuous objections by adjacent residents to the continued presence of a trailhead in the vicinity of Third and C Street pushed the planning team to incorporate a new Point Reyes Station trailhead at the Green Bridge and State Route 1 under Alternatives C and D. The northernmost parcels along C Street are in private ownership (Giacomini family), and, should the land exchange move forward, most of the remaining parcels directly adjacent to C Street would also be in private ownership. The Giacomini were not interested in granting an easement to the Park Service. The Park Service has approached the trustees for the lands at the corner of B Street and State Route 1, however, there are no ongoing negotiations at the time the FEIS/EIR was prepared. The Park Service would pursue this option should the trustees express interest in the future.</p>
C-103	<p>Concern Statement (Southern Perimeter Trail and Replacement of Bridge with Levee Road and Existing Green Bridge): Several individual and organization commenters suggested that the Southern Perimeter Trail be routed along Levee Road and the existing Green Bridge rather than constructing a new bridge at the old summer dam location. One person commented that the bridge was not necessary, because bicycling on Levee Road is safe. Others felt that access along Levee Road could be improved by either creating a bike lane in the existing road footprint or widening Levee Road, potentially on the southern side, and that widening would increase public safety. Some of the commenting organizations disagreed with statements in the DEIS/EIR that this alignment is infeasible because of concerns regarding public safety and impacts to landowners from noise and traffic, with at least one noting that this section of road would with certainty be improved at some point in the future by the County of Marin regardless of landowner concerns. Conversely, some commenters expressed concern about use of Levee Road for public access, saying that there should be no new public access along this road because it is -- and would continue to be -- too dangerous for pedestrians and bicyclists and that only the bridge trail would provide enough safety. One commenting organization stressed the need for the County of Marin and the Park Service to enter into a Memorandum of Understanding to plan, site, and fund public access facilities in this portion of the Project Area together rather than separately.</p>
	<p>Response: The agencies had originally considered inclusion of the Southern Perimeter Trail via Levee Road and the Green Bridge as part of Alternative D during development of its preliminary public access components. However, strong objections were voiced during the alternative and public access workshops (and reportedly during the public meetings for the West Marin Pathway study) from adjacent landowners regarding traffic and noise and from the general public regarding concerns for safety of pedestrians and bicyclists due to the speed and proximity of motor vehicles. Based on these concerns, the agencies eliminated this component from Alternative D, as is discussed in Chapter 2 of the DEIS/EIR under Alternatives Eliminated. Public opinion then changed during the comment period for the DEIS/EIR, with many local community members voicing a preference for having access along Levee Road rather than along the south bank of the East Pasture and across Lagunitas Creek. Several residents of Levee Road submitted a letter in support of having access along Levee Road.</p> <p>As noted in the response to C-91 above, the agencies believe that, based on the change in public opinion and the comments from local agencies, that the southern perimeter trail system is not “ripe for decision” by NEPA standards, despite years of study and meetings with agencies and the public. Further planning is apparently needed before this component can be fully implemented</p>

TABLE 103. COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD FOR GIACOMINI WETLAND RESTORATION PROJECT AND RESPONSE FROM LEAD AGENCIES

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	<p>with support from the affected public. The agencies are committed to working with the appropriate agencies on expanding public access facilities on the southern perimeter of the Project Area. This cooperative project would better enabling better planning of viewing areas and maintenance responsibilities.</p> <p>Based on recent public input, this trail system should first re-explore the feasibility of siting a trail along Levee Road to the Green Bridge, where it could connect to the enhanced Green Bridge County park trail entrance proposed under Alternatives C-D. It could also include the extension to Inverness Park discussed programmatically in the DEIS/EIR. Because this path would be entirely within the County right-of-way, it would be appropriate for the County to take the lead. The Park Service would commit to working with the County: 1) on portions where the trail enters or abuts Park Service lands and 2) on raising the necessary funding. Another option would be to construct a bridge at the location of the old summer dam as is proposed currently under Alternatives A-C. However, should any of these options be chosen, a new environmental document would be required, as this component is only addressed programmatically under Alternative D.</p>
C-104	<p>Concern Statement (Clarification and Suggestions on Programmatic Component): One commenting agency requested clarification on the programmatic portion of the public access component in which the southern perimeter trail would be potentially extended to Inverness Park in the future through a collaborative project with the County of Marin. The agency requested more details on this portion, including whether or not another environmental document would be required before implementation. Another commenting agency suggested that the agencies include a fully accessible, raised viewing platform at White House Pool County park as part of the southern perimeter trail.</p>
	<p>Response: Under Alternatives A-C, the DEIS/EIR incorporates a programmatic component for potential future extension of the southern perimeter trail to Inverness Park through a collaborative project with the County of Marin. This component is included in this document, because it is a possible future action, however, there remain a number of factors that need to be addressed before a decision on whether or how to go forward can be made. These factors include resolving the problem of severe erosion of the creek bank adjacent to Sir Francis Drake Boulevard at White House Pool. The DEIS/EIR notes that this extension would follow one of two possible alignments – construction of a path on the road shoulder of Sir Francis Drake Boulevard all the way from White House Pool to Inverness Park or using a portion of the shoulder with the other portion being routed on a low-elevation boardwalk in the West Pasture (Figures 7, 12, and 15 in the DEIS/EIR). Included in this component is a proposal to construct an ADA-accessible viewing area in the future at White House Pool County park under Alternatives A-C. Because this element is only being addressed programmatically, there are no specific details on exact alignments, construction approaches, or conceptual cross-sections included. These details would be included in a subsequent environmental document.</p>
C-105	<p>Concern Statement (Suggestions to County Parks on Maintenance and Operation): One commenting organization made several suggestions to the County of Marin Parks and Open Space District with regards to management of its White House Pool and Green Bridge County parks, including: 1) use the same type of trail surfacing materials as being considered by the agencies; 2) designate official trails either vegetatively or with split-rail fencing as proposed by agencies; and 3) restore remaining social trails.</p>
	<p>Response: The agencies cannot address comments or suggestions to other agencies.</p>
C-106	<p>The DEIS/EIR identifies a crosswalk along Sir Francis Drake Boulevard to connect the bridge crossing to Bear Valley Creek trail. It does not provide details on whether crosswalk is warranted nor analyzed any traffic or pedestrian hazards from such a crosswalk. Prior to construction of such a crosswalk, additional traffic and safety analysis would need to be provided to the County.</p>
	<p>Response: At this time, the proposed crosswalk has been removed from the document. Based on a safety analysis by DMJM/Korve, a crosswalk is not warranted, given the current number of trail users and the projected number of trail users under each of the alternatives (DMJM/Korve 2007). Should a crosswalk be considered necessary in the future, additional traffic and safety analysis would be performed and provided to the County of Marin Department of Public Works.</p>

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Construction	
C-107	<p>Construction methods, traffic control, and accessibility compliance are not completely described in the document and will be required with the encroachment permit application. Provide information on proposed traffic control measures, and indicate if any lane closures are desired.</p> <p>Response: Construction methods are described in Chapter 2 of the DEIS/EIR. Additional details, including details regarding traffic delays and road closures that were discussed in other sections of the DEIS/EIR (Public Services – Traffic and Transportation), have also been incorporated into Chapter 2 of the FEIS/EIR. Traffic control measures would be developed more fully during the final design phase of the proposed project, and information on proposed traffic control, road closures, and accessibility compliance would be provided on the encroachment permit submitted to the County.</p>
C-108	<p>Concern Statement (Construction Traffic and Routing): One commenting agency asked for clarification on whether construction would generate traffic on public roads from import or export of construction and fill materials and which streets would be used as construction routes, particularly those in Point Reyes Station. One commenter requested that all truck traffic be routed onto the ranch road near the Giacomini Hunt Lodge rather than on 3rd Street in Point Reyes Station.</p> <p>Response: As was discussed in the DEIS/EIR under Public Services – Traffic and Transportation, the proposed project would generate traffic on public roads from trailoring of construction equipment, commuting of construction personnel, and hauling of excavated sediments and other non-soil materials to disposal areas. These impacts are discussed in Chapter 4. Construction routes in Point Reyes Station, Inverness Park, and on roads to the local disposal sites for excavated sediments are discussed both in Chapter 2 and Chapter 4. During construction of the East Pasture, it is anticipated that most of the hauling would be conducted using the ranch road near the Giacomini Hunt Lodge, but construction activities near the southern bank of the East Pasture and demolition of barns would probably generate truck traffic from the access point at Third and C Streets. To minimize noise, contractors would be asked to route trucks on streets that are primarily not residential such as Fourth Street rather than Third Street.</p>
C-109	<p>Concern Statement (Construction Hours and Staging Areas): One commenter requested that construction activities near residences start no earlier than 8 a.m. and that construction staging areas be fenced to ensure public safety.</p> <p>Response: The agencies have responded to this comment by amending the construction start time in sensitive construction zones or construction areas directly adjacent to residences to 8 a.m. in the FEIS/EIR. Most construction staging areas would not be located in areas readily accessible to the public. Efforts would also be made to locate staging areas away from residential areas. Construction and construction staging areas would be posted with signage. In certain areas (near Inverness Park, near Giacomini Hunt Lodge, and near the Giacomini Ranch dairy facility), staging areas could be fenced with construction fencing that would deter access by the public, but this fencing would not completely eliminate the ability of the public, including children, to access construction areas.</p>
C-110	<p>Concern Statement (Public Notification of Construction Schedules): A few commenters requested that the agencies provide or publish construction schedules so that local residents can better be apprised of project progress and better anticipate impacts from construction equipment.</p> <p>Response: A preliminary construction schedule would be mailed out to all people on the mailing list for the proposed project at least two (2) to four (4) weeks prior to implementation. As with all construction projects, this schedule would be subject to change depending on scheduling of construction activities, equipment availability, constraints imposed by mitigation measures, biological and special status species constraints, and other factors. An up-to-date schedule would be maintained on the Seashore’s webpage for the Giacomini Wetland Restoration Project and would be amended on an as-needed basis.</p>
C-111	<p>Concern Statement (Construction and Creation of Breeding Areas for Mosquitoes): One commenting agency stated that impoundment of water during construction should be avoided, because it will create breeding conditions for mosquitoes. It noted that surveillance of the</p>

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	<p>construction area might be necessary in order to address any issues that arise.</p> <p>Response: As discussed in the DEIS/EIR, construction contractors may need to install coffer dams or other water types of water control structures in order to adequately dewater construction areas. These structures could impound water. They would be installed for the minimum amount of time necessary to complete the construction task, but they could provide even temporary breeding grounds for mosquitoes. As discussed under C-17, while mosquitoes are native and elements of natural systems, the Park Service is responsible for control efforts when these organisms pose a threat of a human health hazard as determined by the U.S. Public Health Service. Because stagnant water present during the mosquito breeding seasons could provide habitat for mosquitoes, including those documented to carry West Nile virus, mitigation will include monitoring of pooled water for mosquito larvae as well as the potential use of the mosquito larvicide, <i>Bacillus thuringensis</i>(Bti), a biological pesticide which specifically targets mosquito larvae, is biodegradable and does not have measurable effects on other species.</p>
C-112	<p>During project construction, some existing public access trails should remain accessible and protected from construction traffic.</p>
	<p>Response: Some of the impacts to public access during construction would be alleviated by the fact that the restoration and public access components may not necessarily be constructed during the same years. During construction of the restoration component, only one existing public access trail would potentially be temporarily closed under Alternatives A-D – the informal existing path along the south bank of the East Pasture. The Olema Marsh trail would temporarily be closed during construction of Adaptive Restoration Component #1. Should Levee Road culverts eventually be replaced as part of the adaptive restoration of Olema Marsh, there would also be a temporary closure of the very eastern end of the White House Pool County park trail under Alternatives C-D. Under the No Action Alternative and Alternative A, the existing informal path on north levee would not be affected. When public access components are constructed, the informal path on the south bank of the East Pasture would be closed during construction of the Southern Perimeter through-trail and spur trail components. Under Alternatives C-D, the entrance to the Green Bridge County park would temporarily be closed to improve the trailhead entrance. Under Alternative D, some portion of the White House Pool County park trail system would be temporarily closed for construction of an ADA-compliant trail facility. In general, as discussed in Chapter 4 of the DEIS/EIR of Visitor and Resident Experience – Public Access Resources, impacts to existing public access during construction were characterized as no more than minor, but the effect of traffic delays and potential road closures and effects on other visitor resources in the Seashore’s North District would potentially increase impacts to moderate under Alternatives C and D.</p>
C-113	<p>The USEPA recommends that some additional measures be included in the Spill Prevention and Response Plan, such as 1) a spill kit with boom and sorbent materials should be on site at all times during construction and 2) no vehicles will be fueled, lubricated, or otherwise serviced within 100 feet of the normal high-water area of any surface water body.</p>
	<p>Response: This recommendation has been incorporated into the Impact Avoidance and Mitigation Measures that would be implemented during construction for all alternatives in Chapter 2 of the FEIS/EIR.</p>
Invasives	
C-114	<p>The DEIS/R fails to disclose potential impacts from feral dogs and cats. The Project should mitigate adverse effects from these animals. These actions could include signage to discourage animal dumping and active trapping.</p>
	<p>Response: The agencies have addressed the potential impacts from feral dogs and cats in the FEIS/EIR under Fish and Wildlife Resources/Invasive Wildlife Species. To summarize, feral cats have a documented and adverse effect on birds, amphibians and small mammals in native ecosystems (Winter and Wallace 2006, Patronek 1998). Monitoring throughout the Seashore for impacts of feral cats and dogs is ongoing (N. Gates, wildlife biologist, Seashore, <i>pers. comm.</i>). However, there are no data to suggest that the Project Area will attract the release of unwanted dogs and cats any more than any other road-accessible area of the park. Release of pets on Park</p>

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	Service lands is illegal (36CFR 2.1 (a) 2). Should illegal dumping of pets become a serious issue, signage informing the public of these regulations will be posted. Should impacts in the project area be detected, removal of feral animals will be implemented as mandated by Park Service Management Policies (Section 4.4.2.1).
C-115	<p>Concern Statement (Removal of Eucalyptus from Tomasini Creek and Adjacent Private Lands): Several commenters felt that the Park Service should support a federal/private cooperative to expedite removal of eucalyptus trees from Tomasini Creek and the surrounding privately owned portions of the Point Reyes Mesa bluff. Commenters felt that this partnership would be beneficial, because the trees could be felled across property boundaries; trees could be hauled away on existing ranch roads within the Project Area, reducing impacts to residents; and the cooperative parties could work together to control resprouting trees and implement revegetation. They note that there is support for removal of these trees in the Seashore's Exotic Management Plan, as well as the Local Coastal Plan and the Point Reyes Community Plan. They believe that removal would benefit natural hydrological and ecological processes and conditions, including conditions for the federally threatened tidewater goby, and viewsheds in the Project Area.</p>
	<p>Response: The Park Service agrees that there would be potential hydrologic and ecological benefits to removing the eucalyptus stands that have been planted on the Point Reyes Mesa bluff and would be interested in working cooperatively with private landowners in the future on removal of these stands as a separate project. The agencies have expanded invasive removal efforts to include the moderate number of eucalyptus trees that grow on the berm of Tomasini Creek as described in Chapter 2 of the DEIS/EIR under Actions Common to All Alternatives. Because the historic railroad grade no longer functions as a road, the feasibility of removing trees from the Giacomini Ranch-side of the Mesa is low under the No Action Alternative and Alternatives C-D and would be very difficult even with the tree clearing and eastern perimeter through-trail construction proposed under Alternatives A-B. Trees would have to be moved across Tomasini Creek to the East Pasture, and the ground surface in this area is extremely soft from long-term inundation such that it is likely that most appropriately sized trucks could become repeatedly mired in the mud. Removal of the relative few juvenile and adult eucalyptus trees growing on Tomasini Creek would be achieved by hauling out the cut-up material by foot to one of the north-south running ranch roads in this area.</p>
Miscellaneous	
C-116	<p>The Park Service should assume management of the California State Lands parcels immediately north of the Project Area in order to better integrate management of those lands with management of the Project Area.</p>
	<p>Response: This lease issue is beyond the scope of the proposed project. The Park Service is not currently pursuing a lease for these lands. However, depending on the interest of CSLC, the Park Service may be interested in pursuing a lease of these lands in the future.</p>
C-117	<p>Sub-Topic (Hunting on Adjacent State Lands): A few commenters urged the Park Service work with other agencies to prohibit hunting on California State Lands Commission (CSLC) lands to the north of the Giacomini Ranch. One commenter suggested that the hunting area be shifted northwards towards Inverness or even as far as Walker Creek to provide a reasonable buffer.</p>
	<p>Response: This hunting issue is beyond the scope of the proposed project. However, in the future, the Park Service will discuss the issue with the California Department of Fish and Game (CDFG), which has management authority over this CSLC property.</p>
C-118	<p>The DEIS/R is inadequate because it does not provide estimated costs of the proposed alternatives and does not provide a cost/benefit analysis.</p>
	<p>Response: Inclusion of estimated costs and cost/benefit analysis is not a requirement of NEPA or CEQA. Reasonable alternatives" warranting detailed study are described in the President's Council on Environmental Quality (CEQ) guidance as "those that are practical or feasible from the technical and economic standpoint and using common sense." Costs and economic viability are considered along with other factors in determining the reasonableness of alternatives. However, they are not necessarily used as factors to evaluate the potential impacts of proposed projects on</p>

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	the "human environment." Impact topics chosen for evaluation are typically ones related to the physical and natural environment, although, under CEQA, social or socioeconomic topics are often incorporated, as well, if the proposed project would have some effect on the physical environment.
C-119	<p>Sub-Topic (Inclusion of Land Exchange in DEIS/EIR): Several commenters commented upon the proposed land exchange between the Park Service and the Giacomini family. One commenter felt that the DEIS/EIR was inadequate, because it did not address the proposed property exchange. Another commenter felt that all the agriculturally zoned property in the Project Area should be in public ownership and that all infrastructure should be removed. One person questioned how the acquisition of the parcels along Sir Francis Drake Boulevard would impact Alternatives C or D.</p>
	<p>Response: The proposed land exchange was addressed in the DEIS/EIR as a separate project from the one proposed by the Park Service and CSLC and was listed in the table at the beginning of Chapter 4 that lists actions included in cumulative effects analysis. The project was titled Residential Home Development, C Street, even though a specific project has not been proposed, because the lands are zoned for residential development, and the reasonably foreseeable outcome of an exchange of Park Service C Street Lands for the remaining pastureland parcels still owned by the Giacomini is that homes would be developed along C Street. Inclusion of this reasonably foreseeable action in the cumulative effects analyses means that the potential impacts of each alternative (including Alternatives C and D) are considered in combination with those of the Residential Home Development for all of the impact topics addressed in the environmental document. To better clarify this in the FEIS/EIR, the proposed land exchange is now included as a separate project from Residential Home Development, C Street, and its cumulative impacts are analyzed separately from those of the reasonably foreseeable development of homes along C Street. Because of public comment, the Park Service and the Giacomini restructured the proposed land exchange agreement such that the Park Service would retain all agriculturally zoned parcels and tear down all of the buildings on Park Service lands proposed for exchange to the Giacomini family.</p>
C-120	<p>Sub-Topic (Inclusion of Park Service Property in Exchange Project in Restoration Project): One commenter felt that the DEIS/EIR did not adequately explain why the Park Service property along C Street that is proposed for exchange for lands currently owned by the Giacomini family was excluded from the Giacomini purchase and why it was not considered integral to -- and included in -- the restoration project. This commenter felt that the Park Service should seek funding from a variety of federal and private funding sources to retain possession of the parcels west of C Street to be incorporated into the Project Area.</p>
	<p>Response: As discussed under C-1 and C-55, the Park Service's MOU with CalTrans calls for a restoration of a significant portion of the Giacomini Ranch. However, it does not call for restoration of the entire ranch. In the purchase and in developing the proposed project, the planning team focused its efforts on where it felt that the limited dollars available for purchase and restoration could yield the most ecological benefit. For the most part, these were areas in the low-lying pastures or former historic coastal marsh areas that are not directly adjacent to existing residential, commercial, and agricultural development and areas that have not been subject to intensive historic impacts such as repeated fill events that would require extensive excavation and rehabilitation before they could be considered "restored." For this reason, the agencies elected not to focus their restoration efforts on the dairy facility parcels along C Street in Point Reyes Station that have been subject to repeated fill activities, disturbance from dairy activities, and are directly adjacent to the town of Point Reyes Station, which would increase the likelihood of wildlife disturbance from people and domestic and feral animals. These were some of the reasons that the Park Service elected to enter discussions with the Giacomini family to exchange some of these parcels for low-lying pasturelands that were considered to have more existing ecological value as part of a separate project that is discussed in the DEIS/EIR under Cumulative Impacts in Chapter 4.</p>
C-121	<p>We would encourage the Park Service to continue to fund ongoing monitoring at a high level in order to track progress of the restoration actions and to allow for ongoing adaptations as needed.</p>
	<p>Response: The Park Service has developed a long-term monitoring program for the proposed project. As part of this monitoring project, the Park Service has been conducting pre-restoration</p>

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	monitoring to establish baseline conditions and is proposing to continue monitoring after restoration is completed. Monitoring would be conducted frequently during the first 5- to 7 years post-implementation to document what is expected to be a fairly rapid evolution of the managed pasturelands into natural wetlands shaped by natural hydrologic and ecological processes and functions. Between Year 7 and Year 20, monitoring is proposed for Year 10, Year 15, and Year 20 to document changes in processes and functions that are expected to take longer to evolve. Monies have been secured to fund at least the first few years of monitoring of changes in wildlife and water quality and other variables directly or indirectly related to hydrology such as invertebrates, algae, and sediment deposition, but additional funding would be needed to fund other variables and the later years of monitoring.
C-122	Who is responsible for maintenance and law enforcement on any trails established within the Project Area?
	Response: The Park Service's Law Enforcement Division is responsible law enforcement on Park Service-owned lands within the Project Area, with backup, when needed, from the Marin County Sheriff's Office. Law enforcement on lands not owned by the Park Service would fall to the Marin County Sheriff's Office. Maintenance of trails on Park Service-owned lands would fall to the Park Service's Roads and Trails Division. Maintenance of trails that are not on Park Service-owned lands would fall either to the land owner or lessee: in the case of White House Pool and Green Bridge County parks, it would be the County of Marin Parks and Open Space District.
C-123	The Park Service should bury existing overhead utility lines between Point Reyes Station and Inverness Park.
	Response: The utility lines do not fall on Park Service lands. Most of the utility lines have been placed in the right-of-way for County of Marin roads. Burying of overhead power lines would be under the jurisdiction of the utility and the County of Marin.
C-124	Change the name of the site from "Waldo Giacomini Wetland" to "Tomales Bay Wetland."
	Response: As a condition of the purchase agreement with the Giacomini family, the Park Service agreed to name the restored wetland after Waldo Giacomini, the founder of the Giacomini Ranch dairy.
C-125	Disposal of dredged materials within PRNS may impact rare plants and introduce invasive plants. Mitigation measures should be implemented.
	Response: The Park Service is handling restoration of the quarries with imported materials as a separate project. It is listed in Chapter 4 as one of the Actions Included in the Cumulative Effects Analysis. Hauling of excavated sediments to the quarry is incorporated into this FEIS/EIR. The Seashore has prepared extensive maps showing the locations of rare plants with respect to the quarries and is in the process of refining the wetland delineations. Most of the potential impact would occur with hauling to the McClure DG quarry. The impact analysis for Vegetation Resources addresses potential impacts to wetlands and special status plant species, including proposed mitigation measures to either avoid or minimize those impacts. In terms of introducing invasive plants, the preliminary restoration plan involves disposal of imported materials at the bottom of the quarry, with grading of adjacent surface soils used to provide a "cover" or topsoil layer of sufficient depth to bury seeds and vegetative propagules of non-native invasive plant species and thereby preclude their establishment.
Permitting	
C-126	Concern Statement (Additional Permits or Consultations That May Be Required): Several commenting agencies suggested that the agencies would need to seek additional permits or consultations other than those noted in the DEIS/EIR: These included: 1) consultation with Bay Area Air Quality Management District; 2) Gulf of the Farallones National Marine Sanctuary; 3) State National Pollution Discharge Elimination System (NPDES); 4) California Endangered Species Act; and 5) Lake and Streambed Alteration Agreement. The CESA would require CEQA documentation, including specified impacts, mitigation measures, and a mitigation and monitoring reporting program.
	Response: The agencies have incorporated the need for these permits or consultations into the

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	<p>planning process, as is now reflected in the revised Chapter 5 of the FEIS/EIR. A mitigation and monitoring program has been developed and included as an appendix in the FEIS/EIR.</p>
C-127	<p>The State Department of Conservation cannot concur with a finding that a conversion of the East and West Pastures to non-agricultural uses would be less than significant unless additional clarifying detail is provided. Also, the DEIS/EIR indicates that there may be additional acquisitions that would expand the Wildlife Area in the future, but does not elaborate. Any future acquisition would require additional environmental documentation, and we ask that we receive a copy of the documents for our review and comment.</p>
	<p>Response: After further discussion with the State Department of Conservation officials, the agencies have incorporated a separate memorandum detailing the results of the LESA as an appendix in the FEIS/EIR. This appendix should provide the necessary information which the State Department of Conservation can use to conclude that the impacts to non-agricultural uses would be less than significant. There would be no further acquisitions as a part of the proposed project.</p>
C-128	<p>Does the Park Service have an estimated date for when California Coastal Commission consistency determination submittal will occur?</p>
	<p>Response: The Coastal Commission consistency determination submittal would occur concurrently with production of the FEIS/EIR.</p>