

January 10, 2014

To: National Park Service –  
[http://parkplanning.nps.gov/muwo\\_parking](http://parkplanning.nps.gov/muwo_parking) and  
[http://parkplanning.nps.gov/muwo\\_access](http://parkplanning.nps.gov/muwo_access)



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### Muir Woods Transportation and Access Site Improvements

Marin Conservation League submits the following comments to assist the National Park Service in developing the scope for an Environmental Assessment of alternatives being considered to improve transportation, parking, and access to Muir Woods National Monument ("Muir Woods"). The Park Service is also considering a closely related project – the Muir Woods Parking Reservation and Shuttle System. It seems arbitrary to separate comments on these closely related projects, although for purposes of NEPA, the Park Service is assuming that the latter project does not involve physical changes to the environment. As our comments indicate, the latter project could have impacts on the physical environment and, therefore, because the two are so closely linked, both should be subject of an Environmental Assessment.

Under the first project, the proposed actions subject to the EA could include the following:

- A new parking lot on Panoramic Highway that would be served by the park shuttle (*It is our understanding that this action has been dropped from consideration*)
- Minor expansion and/or reorganization of existing parking lots at Muir Woods to improve vehicle and pedestrian circulation
- Conversion of existing operational areas at Muir Woods for parking and other uses
- Extension of the Redwood Creek Trail from Deer Park Fire Road to the monument entrance, including boardwalk sections
- Completion of plaza improvements begun in 2010, including additional re-vegetation and a new restroom
- Improved Dipsea Trail route
- Changes in the management and use of Muir Woods Road

With the exception of the last item in the list – Changes in the management and use of Muir woods Road – MCL believes that most of these actions can bring some relief to problems of local parking, access, and circulation at the Monument without having significant adverse

impacts on the sensitive biological, hydrological, and cultural resources that make Muir Woods unique. Potentially significant impacts of the proposed projects and mitigation measures will be highly local in nature. For example, completing plaza improvements already begun with removal of asphalt and revegetating of the reopened plaza area, will continue to improve both the aesthetics of the entry and the soundscape of the Monument, with an inconsequential reduction in parking capacity. Improving restroom facilities will contribute positively to the visitor experience. Improving Dipsea Trail routing will remove some hazards from the existing awkward crossing of road and parking areas and should be environmentally beneficial depending on the proposed means of crossing Redwood Creek. Extending the Redwood Creek Trail from Deer Park Fire Road would take pedestrians off the road, and could be done in a manner that avoids adverse impacts to the Creek; however, it does not clarify where all cars that currently park on Muir Woods Road will be parked. Therefore, with this one exception, the local scope of the EA on proposed actions will follow NEPA protocols and include assessment of air quality, water quality, biological resources, the floodplain, habitat, and water quality of Redwood Creek, cultural resources, and so on.

The EA will need to clarify, however, what “changes in management of Muir Woods Road” will involve, and what impacts can be expected. Currently, up to 475 cars can end up parking illegally on the unimproved shoulder of the road, making conditions for both visitors and local traffic patently unsafe and compromising water quality in the adjacent Redwood Creek from discharge of road pollutants. How might the County’s role in regulating traffic and parking on Muir Woods Road change? The County has been considering a Memorandum of Understanding with the Park Service to share responsibilities for maintaining and regulating traffic and parking on Muir Woods Road in some manner. This must be addressed in the EA.

Also missing from an otherwise straightforward EA on these local physical improvements is their relation to the larger issue of numbers and distribution of visitors and associated transportation impacts on entry and neighboring communities. What numbers in terms of daily, weekly, and annual visitation are assumed in the design and operation of the improvements? To address this issue in relation to local and regional traffic and parking impacts, one must turn to the other proposed project – Muir Woods Reservation and Shuttle System.

#### Muir Woods Parking Reservation and Shuttle system

According to the NPS web site, NPS is proposing to create a parking reservation system that would support management of visitation to levels that meet park goals for safety, natural

resource preservation, visitor experience, and public access. The reservation system would allow the park to work with visitors in advance of their arrival so that congestion, and its related impacts, can be minimized. NPS anticipates that the system would operate year-round and reservations would be made through a website or call center. Because implementation of the reservation system would use existing park and county infrastructure, no new construction is being proposed, so the “project” does not require NEPA assessment. The project description begs a number of questions, however.

The Monument attracts almost a million visitors each year, unevenly distributed due to daily, weekly, and seasonal preferences. The automobile (parking) advance reservation system would be designed to spread visitor use away from weekends and peak hours. At the same time, it could considerably increase total annual visitors, thereby extending traffic through neighboring communities over longer periods in the day and week. Critics favor a more robust shuttle system, operating from Manzanita but, preferably, from more distant points of visitor origin. Both situations could involve physical changes in the environment, e.g., impacts of extended traffic on local roads; and possible impacts of creating new shuttle pick-up (and related parking) locations elsewhere in Marin or in more distant locations.

This leads to the most significant question confronting park planners – the optimum visitor capacity for Muir Woods and the need for a cap on visitors on a daily, weekly and annual basis. The conclusion of MCL is that a realistic cap is needed to ensure the long term health of Muir Woods as well as a positive visitor experience. NPS planning appears to be targeting attendance at 4,000 persons per day. These visitor numbers should be reduced rather than increased from the present.

It is MCL’s assumption that the EA will build on earlier analyses contained the Draft EIR on the Draft General Management Plan, where it specifically addresses Muir Woods National Monument. In this context, the analysis of User Capacity at Muir Woods is useful but anticipates the need for further regulation of the amount and timing of use as part of the alternatives for reduced parking and an increased emphasis on shuttle access (Volume III: 16). For every Indicator (of capacity) the analysis includes “Reduce use levels” as one of several Management Actions to meet standards. The analysis also calls for continued monitoring of indicators and standards to possibly redirect or modify management actions.

Missing from the analysis, however, is any mention of the indirect impact of User Capacity on the entry and neighboring communities. Traffic and transportation impacts, along with associated air quality, noise, and other impacts, are addressed elsewhere in the EIS on the Draft GMP, but the connection between optimum capacity of Muir Woods and the ripple

effect of increased, or redistributed, traffic impact, as a function of visitor capacity, on surrounding communities is not addressed.

In conclusion, MCL believes that the two projects above need to be connected and that both will have potentially significant impacts on the environment that must be mitigated. The Park Service has a variety of management tools at its disposal to address these problems, many of which can be positive, but these will require full disclosure in a comprehensive Environmental Assessment.

A handwritten signature in blue ink that reads "Jon Elam". The signature is written in a cursive style and is positioned above the typed name and title.

Jon Elam  
President

cc: Supervisor Steve Kinsey  
Supervisor Kathryn Sears  
Congressman Jared Huffman (Att'n Jenny Callaway)

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