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Name: Kate Powers
Address: 175 N. Redwood Dr.
Suite 135
City: San Rafael
State: CA
Postal Code: 94903
Email Address: mcl@marinconservationleague.org
Organization: Marin Conservation League
Keep My Info Private: No

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Marin Conservation League Comments on Muir Woods National Monument
Reservation System Environmental Assessment

Marin Conservation League appreciates the opportunity to submit comments on the subject Environmental Assessment. MCL has been closely involved in the public and stakeholder meetings that resulted in a Memorandum of Understanding between the National Park Service and the County of Marin concerning the management of traffic congestion at Muir Woods, unsafe parking on Franks Valley Road, and the protection of the Redwood Creek watershed.

Comments: The proposed Reservation System is an essential step in the MOU toward resolving the current and growing problems of congestion and hazardous parking outside the Monument. The proposed action would also have the effect of reducing the total numbers of visitors during peak seasons, weekends, and hours of the day as well as spreading visitors more evenly over non-peak periods. Although the County has signed the MOU, the NPS cannot sign it and initiate tasks outlined in the MOU until the EA process on the Reservation System is completed. Notably, the EA process will cover all actions included in the MOU that would be subject to analysis under the National Environmental Policy Act (NEPA).

As a general comment, MCL supports Alternative B - the proposed Reservation System (also the Preferred Alternative as described in the EA and outlined in the MOU). The System would be implemented within two years of execution of the MOU and then operated by a third-party contractor to NPS. In the meantime, NPS, in collaboration with the County and California Department of Parks and Recreation (State Parks) will undertake tasks outlined in the MOU, the first of which is to reduce on-road parking to 80 defined spaces downstream of the concrete bridge.

Other tasks include partnering with Marin Transit to promote public transit, cooperating with the County to install parking barriers and enforce parking restrictions, undertaking interim stormwater management measures, and participating in routine maintenance of shoulder and pedestrian areas within the Parking Management Corridor.

Although MCL supports the Preferred Alternative in concept, we also believe that the estimated limit of 4,250 visitors/day for peak weekends throughout June, July and August (with no more than 10% of days over this limit) is higher than it should be, and that high visitor numbers will continue to challenge NPS long-term ability to protect the sensitive redwood and creek resources inside the Monument from human impacts. However, this scenario is certainly preferable to estimated visitation under the No Project Alternative, which could exceed 5,000 or even 6,000 visitors/day. As proposed, the Reservation System will meet the important objective of reducing, then entirely eliminating parking on the shoulder of the Franks Valley Road outside the Monument, a significant benefit of the Preferred Alternative.

Our specific comments on the EA are as follows:

1. Scope of the EA: To understand the scope of the EA, we searched for Table 1, listed in the Table of Contents as Summary of Scoping Comments Received, and found no Table 1. Instead, we found a brief summary of common themes raised during the comment period between September 18, 2013, through January 11, 2014 - almost two years ago. The summary is so general, however, that it provides little insight into the explicit public concerns that might have been included in the EA.

2. Connected Action(s): The EA makes a strong case for the proposed Reservation System as not triggering another action - as having independent utility. We accept that it is independent of, and not reliant on, Site improvements proposed inside the Monument.

The EA also makes the case that it covers all NEPA-related tasks and goals of the MOU, one of which is to protect, preserve, and enhance the health of Redwood Creek Watershed, including its salmonids in the downstream areas that have been impacted by parking. In that vein, it should cover an MOU responsibility that involves collaborating with State Parks on projects that improve habitat conditions for salmon and other species in the Redwood Creek Corridor. Given that the EA contains no analysis of factors that might impact, either positively or adversely, the general health or habitat conditions of the Redwood Creek Watershed (see Item 3. below), we question that these MOU tasks are in fact adequately analyzed by the EA. We can only conclude that actions such as undertaking interim storm water management measures are considered routine or maintenance activities that might benefit the Creek but do not reach a NEPA threshold. Any major projects, such as total rehabilitation of the road, including culvert replacement, or restoration of the creek, both of which would bring real benefit to Redwood Creek habitat, would be independent and therefore subject to further environmental review under both CEQA and NEPA.

3. Topics dismissed from analysis: The proposed action is a vehicle reservation

system, whose purpose is to reduce peak visitation levels by managing motorized vehicle access and thereby achieve certain key objectives: enhance overall visitor experience, and enhance the protection of resources in the Redwood Creek watershed. Since much of the discussion of the MOU throughout numerous meetings centered on environmental benefits to the Creek that would be achieved by reducing, then eliminating, parking on the shoulder of Franks Valley Road, it is surprising to find that the Environmental Assessment does not analyze the environmental impacts of the action in relation to indicators of those benefits, such as Water Quality, Threatened or endangered species, Wildlife Habitat, Vegetation, and Geology, Soils, Bedrock, and Streambeds. Instead, these topics are dismissed as either unlikely to occur, not potentially significant, or do not differ among alternatives in any meaningful way.

We recognize that the primary physical changes that the reservation system would cause are the gradual removal of automobiles from parking on the shoulder of Franks Valley Road, and the incremental reduction in total visitor numbers and redistribution of visitors away from peak periods. In the case of parking, one would expect relief from pollutants such as oil and grease, copper from brake pads, other heavy metals, bacteria, as well as trash, deposited on soils and mobilized in storm runoff. Would removing automobiles not have a beneficial impact? If not, then what aspects of the action are expected to achieve the protection of habitat resources in the Redwood Creek Watershed? We would appreciate some response to this question, in that a key objective of the reservation system identified in the EA is enhancing the protection of resources in the Redwood Creek watershed, as well as enhancing the overall visitor experience (which is thoroughly analyzed in the EA). In conclusion, we appreciate the efforts by NPS and County and all other parties in crafting an MOU that will go a long way toward resolving persistent traffic problems at Muir Woods and in the neighboring communities (and should have a beneficial effect on the Creek). It is not the only step, but a significant one. We look forward to the completion of the EA to enable the MOU to be fully executed. Further, we look forward to the coming opportunity for major rehabilitation of the roadway as one piece among many connected pieces that are all essential to restoring the health of the Redwood Creek Watershed.

Submitted by Marin Conservation League Kate Powers, President Nona Dennis, Chair, Parks and Open Space Committee

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