DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION
BOLINAS WYE WETLANDS RESILIENCY PROJECT
RESPONSES TO COMMENTS

September 29, 2023

1.1 Introduction

The draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Bolinas Wye Wetlands Resiliency Project (Project) was available for a 35-day public review and comment period July 5 through August 8, 2023. The Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) was posted at the Marin County Clerk's Office and published on the Office of Planning and Research State Clearinghouse CEQAnet on July 5, 2023, and the NOI for the proposed Project was emailed and/or mailed to neighborhood residents, stakeholders, tribes, responsible agencies, decision-makers, and individuals who previously expressed interest in receiving such notification. The NOI was published in the legal section of the Marin Independent Journal on July 5th and 13th, 2023. The NOI was posted on the Marin County Open Space District's (MCOSD) website, found at marincountyparks.org. During the public review period, public comments were received through an online comment submission format and via email.

MCOSD received comments from 27 parties during the public review and comment period of which 18 expressed support for the proposed Project. The comments were reviewed by the MCOSD and grouped into categories for response.

1.2 Comments and Responses

Please note that written comments submitted during the IS/MND's public comment period included comments relevant to the proposed Project's approval/disapproval along with comments relevant to the adequacy of the environmental review. The responses to comments acknowledge the comments which address proposed Project approval but focus responses on the comments that raise potential environmental impacts or the adequacy of the environmental review. Pursuant to CEQA Guidelines, Section 15088(c), the focus of the responses to comments is on "the disposition of significant environmental issues raised." Therefore, detailed responses are not provided to comments that do not relate to environmental issues.

The following Master Responses (MRs) have been organized according to the section of the IS/MND they primarily reference.

This Response to Comments document includes comment summaries and responses within each of the Master Response categories, a matrix that includes each of the comments received and which Master Response(s) respond to the comments, all comments received bracketed to show which Master Response(s) respond to the comments, changes to the draft IS/MND resulting from comments and responses to comments, and any supplemental information prepared to respond to comments.

ATTACHMENTS

1 Comments Received on the IS/MND
2 Changes to the IS/MND

1.3 Responses to Comments

Master Response 1: Support for the Proposed Project

Master Comment Summary: The MCOSD received comments supporting the proposed project.

Of the comments received, 18 commenters supported the proposed Project, including local residents, land managers, partnerships, a federally managed marine sanctuary, and a non-profit. Common reasons for supporting the project include the following:

- Restoration of hydrologic, geomorphic, and ecological processes in the Bolinas Wye wetlands to improve aquatic, wetland, and upland habitats.
- Improved resiliency of in stream, tidal wetlands, riparian, and upland habitats to sea-level rise and climate change.
- Reconnection of Lewis Gulch Creek to Bolinas Lagoon in a more natural way, benefiting humans and wildlife alike.
- Multi-benefit project that adapts to sea-level rise, creates more resilient marsh habitat, and improves hydrologic circulation and water quality.
- Creation of migratory bird and resident bird habitat and important refugia for anadromous fish.
- Benefits to several threatened and endangered species, including California black rail, steelhead trout, and coho salmon.
- Improved access to the coast by improvements to the intersection of the Bolinas Olema Road and California State Route 1 (SR-1).

Response

The MCOSD appreciates the support of the proposed Project expressed by commenters. The purpose of the proposed Project is to restore hydrologic, geomorphic, and ecologic processes resulting in an overall improvement to aquatic, wetland, and upland habitats, as well as maintaining existing transportation access for the town of Bolinas during scenarios consisting of up to 5.5 feet of sea-level rise and a 100-year storm event. By restoring natural processes to the Bolinas Wye wetlands and alleviating chronic flooding of Marin County and state roadways, the wetlands and roadways would be more resilient to anticipated sea-level rise through the end of the century.

Master Response 2: Project Need, Purpose, and Objectives

Master Comment Summary: While roads may have some effect, other processes are responsible for the degradation of the watershed. Logging, land use practices upstream, and climate change are mostly responsible for the increase in sediment transport.

Caltrans staff is not in full agreement with the below statement as described in excerpt from comment letter:

> "The surrounding roads, channels, and culverts (Lewis Gulch Creek at SR-1, Wilkins Gulch Creek, Salt Creek; described further below) further constrain stream, wetland, and floodplain processes in the Bolinas Wye wetland. Under these conditions, sediment is being transported to and is accumulating in the roadside ditch and box culvert instead of the Bolinas Lagoon and wetland areas. Restoration of more natural hydrologic processes is needed for wetlands to continue to exist with future SLR encroaching against the current hardscapes within the Wye."

While the roads may have some effect, the degradation of the watershed due to logging/land use practices upstream/climate change is mostly responsible for the increase in sediment transport. The sediment is going to settle out in its "happy place" depending on flow velocities/particle size/ and topography. The undersized box culvert at Lewis creek probably does not help but if the slope flattens out there it probably still will happen in that reach. Humans were just really good at building at these locations.

See the issues at PM 16.47 Winnebago Point for similar issues.

Response

Sediment transport in creeks in the region is a natural process, and to be clear, the project description does not claim that there has been an increase in sediment in the Lewis Gulch Creek system. Rather, there is an upstream sediment supply that is naturally transported through the system. Within the Project Area, Lewis Gulch Creek is very constrained by the hillside and the road within the reach that runs immediately adjacent to Olema Bolinas Road, and has required dredging by the Marin County Department of Public Works (DPW) to remove sediment that has accumulated upstream of and inside the existing undersized and poorly functioning culvert. Under post-Project conditions, sediment entering the Wye from Lewis Gulch Creek will be able to disperse within the wetland, as a natural process in alluvial fan systems.

In the Project Area, the slope of the channel decreases, resulting in a decrease in the creek's ability to transport sediment. The two hydraulic properties most closely associated with flowing water's ability to move sediment are velocity and shear stress. Velocity (measured in feet per second) is a function of, in part, the slope, channel shape, and the relative roughness of the channel bed and banks. Water in channels with higher velocity generally transports more sediment. A simplified example of how these factors affect velocity and sediment transport capability is that a steeper, smoother, and narrower channel will have higher velocities, while a wider channel with more roughness (vegetation, rocks, roots, etc.) at a more modest slope will have water that moves more slowly and with less ability to move sediment.

Similarly, shear stress is a measure of pressure measured in pounds per square foot. Shear stress is a function of the water surface slope, water depth, and the density of water. Higher shear stress values generally correspond to an increased ability for the water to transport sediment. As a simple example, deeper water with a higher slope will transport more sediment than shallower water with a lesser slope.

As described above, under current conditions, the deposition of sediment is concentrated above the existing undersized culvert where velocity and shear stress are decreased. This sediment is deposited within the channel and on Olema Bolinas Road. The slope of the proposed channel within the proposed Project area will remain close to the slope of the existing channel, and the continued deposition of sediment as a natural process is expected. The Lewis Gulch Creek channel is steeper in the upstream area of the proposed Project and becomes progressively less steep through the Project reach, reaching the lowest slope in the Wye reach. Correspondingly, the proposed channel becomes progressively shallower downstream of the new Olema Bolinas Road bridge through the Transition reach and Wye reach. This transition results in a steady decrease of both velocity and shear stress. The design is intentional, and will allow sediment to deposit on the alluvial fan. Larger sediment will deposit in the upper portions and smaller particles in lower portions of the Wye. Fine, or suspended, sediment will move through the system and into Bolinas Lagoon where it plays an important role in the building of the marsh plain through daily tidal action.

The figures presented below help compare existing and proposed conditions with respect to velocity and shear stress during peak flow events.

Figure 1 and Figure 2 demonstrate that the proposed Project will provide higher velocity as flows cross under Olema Bolinas Road to encourage deposition in the Wye reach during the 1-year storm event.

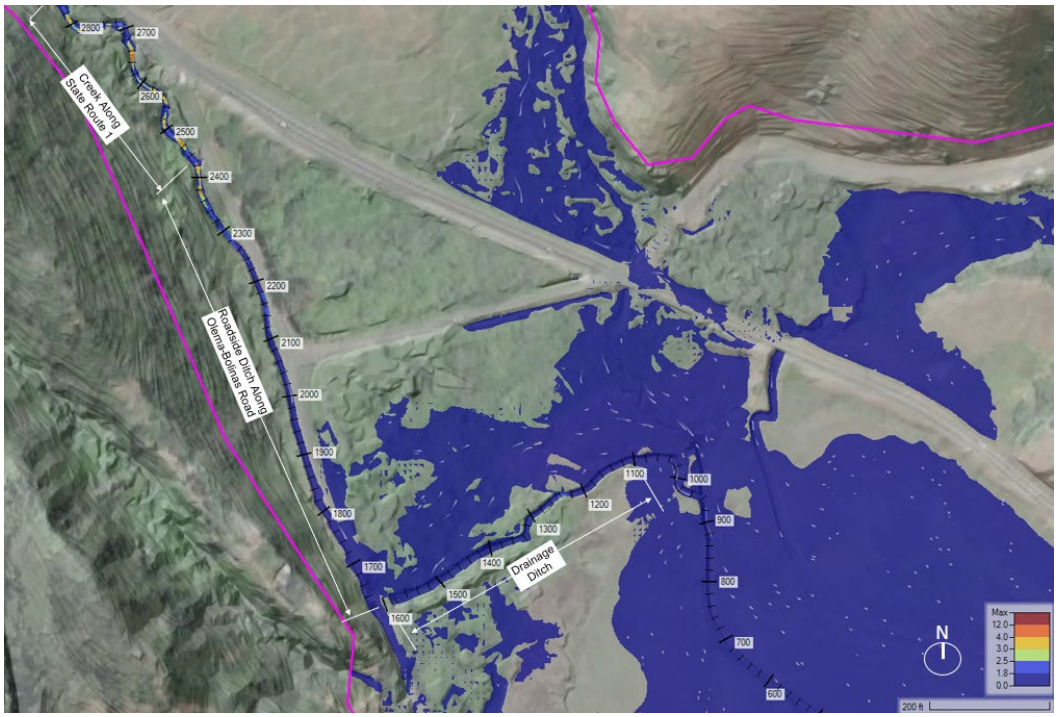


Figure 1. Existing Conditions Velocity (fps) Map for the 1-Year Storm Event

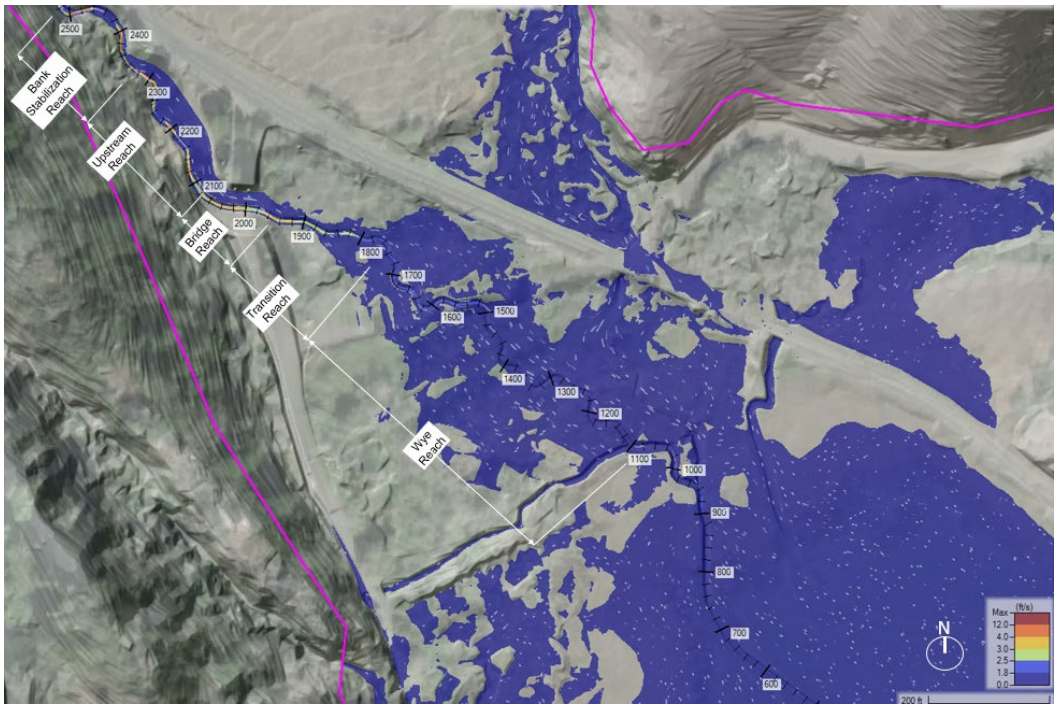


Figure 2. Project Conditions Velocity (fps) Map for the 1-Year Storm Event

Figure 3 and Figure 4 demonstrate that existing conditions corroborate the DPW's need for maintenance activities to remove cobbles and gravels in the roadside ditch. The proposed Project uses natural processes during storm events to encourage the deposition of 6" cobble and 2" gravel onto the upstream floodplain and into the Transition reach and Wye reach.

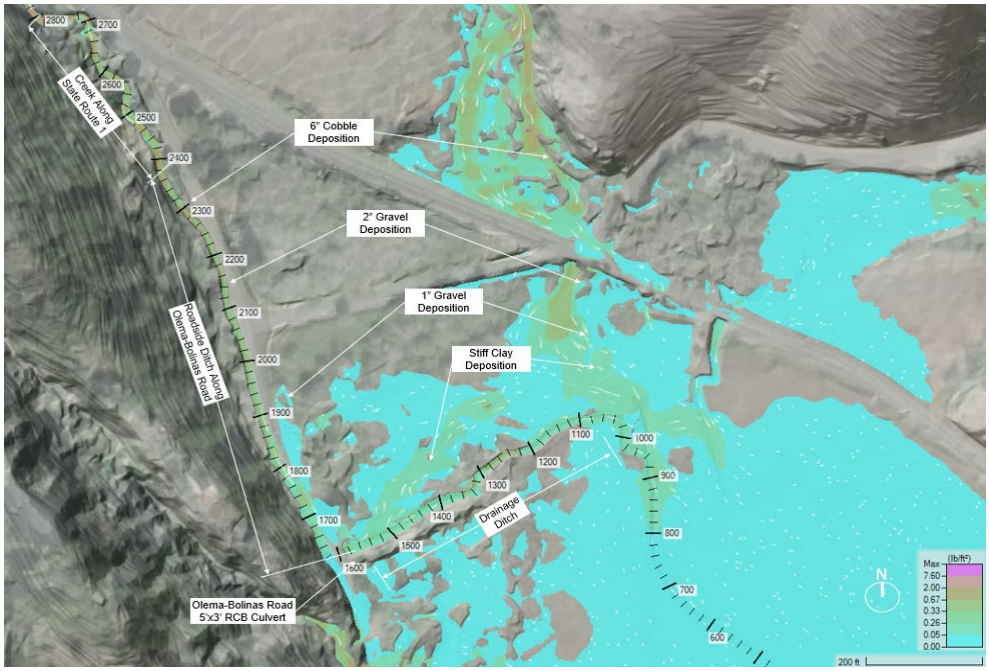


Figure 3. Existing Conditions Shear Stress (psf) Map for the 1.5-Year Storm Event

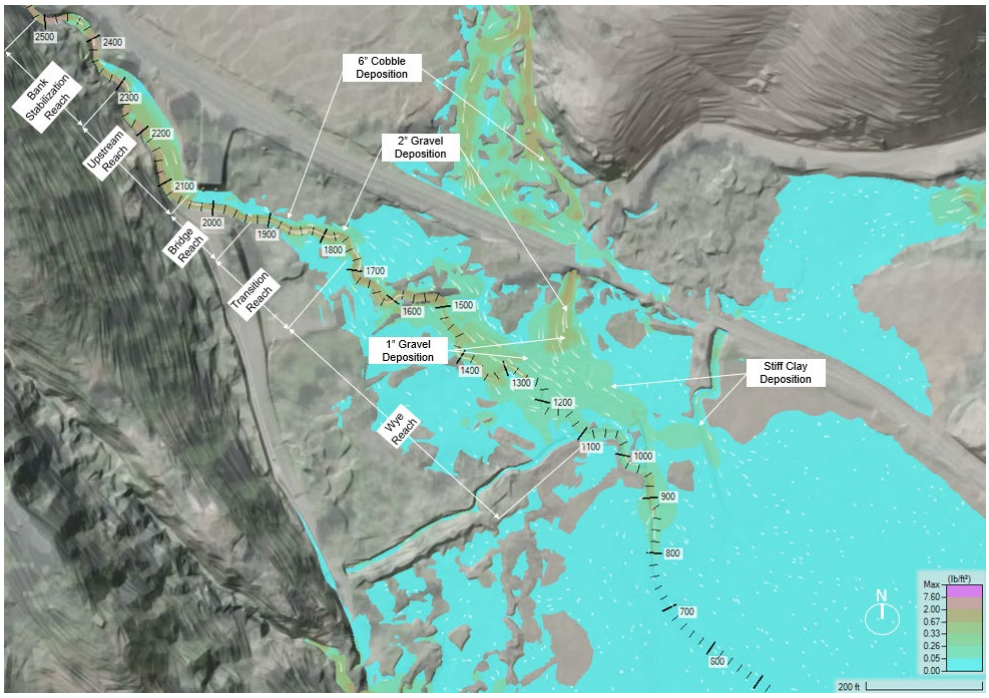


Figure 4. Project Conditions Shear Stress (psf) Map for the 1.5-Year Storm Event

Modeling of the existing creek alignment and post-Project creek alignment help compare existing and proposed conditions with peak flows ranging from 1 to 5 years and permissible velocity for 6" cobble, 2" gravel, 1" gravel, and silty loam. Figure 5 demonstrates that the model output velocity at the existing Olema Bolinas culvert is insufficient to transport all four grain size classes listed. Figure 6 demonstrates that the model output velocity at the proposed bridge would be sufficient to transport silty loam and 1" inch gravel in a 1-year event and all four grain size classes in a 5-year event. Under proposed post-Project conditions, it is expected that 6" cobble and 2" gravel will deposit in the Transition reach and 1" gravel and silty load will deposit in the Wye reach.

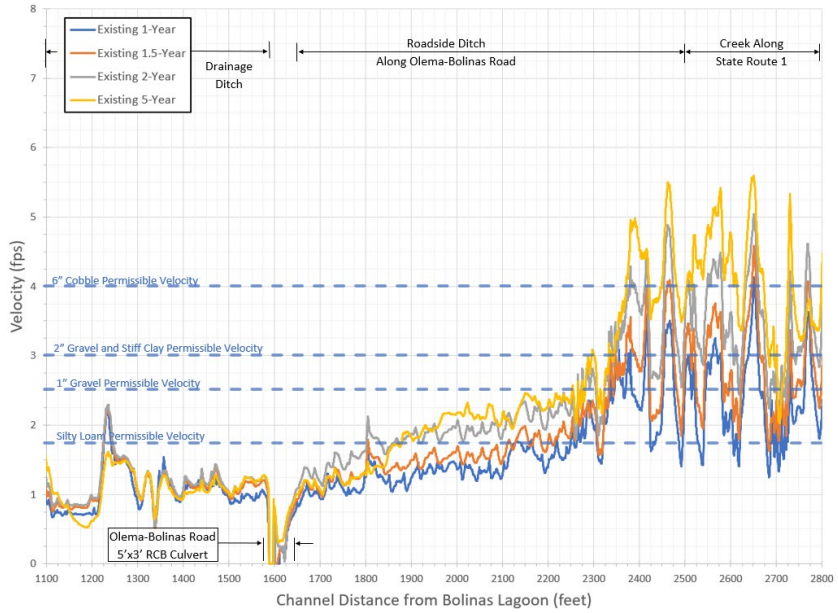


Figure 5. Existing Conditions Profiles of Velocity for 1-year to 5-year events

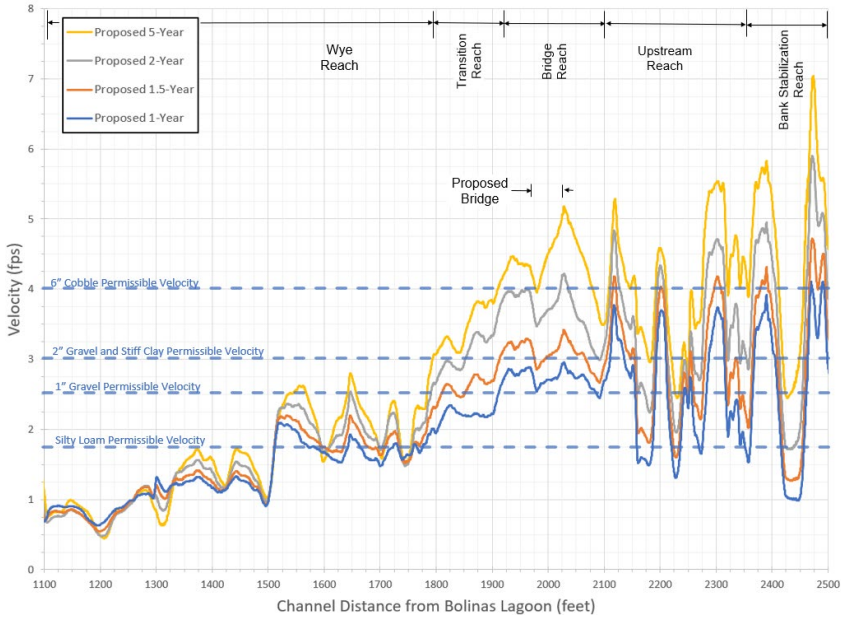


Figure 6. Project Conditions Profiles of Velocity for 1-year to 5-year events

Figure 7 and Figure 8 provide model outputs for shear stress along the existing creek alignment and post-Project creek alignment. Under existing conditions, there is insufficient shear stress to mobilize sediment through the existing Olema Bolinas Road culvert for all grain size classes listed. Under post-Project conditions, the model outputs for shear stress indicate sufficient shear stress at the proposed bridge to mobilize silty loam, 1" gravel, and 2" gravel in a 1-year event and all listed grain size classes in a 5-year event.

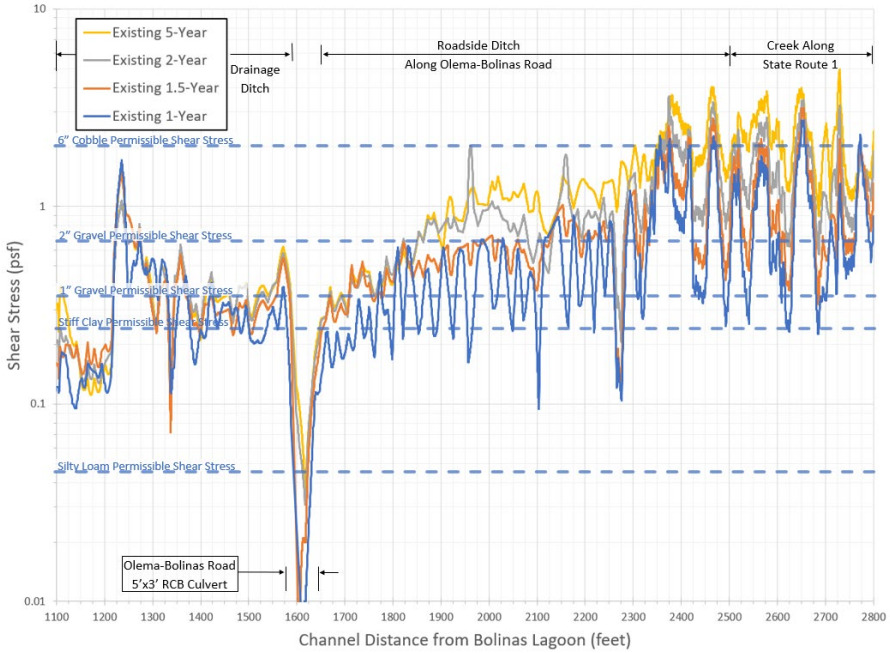


Figure 7. Existing Conditions Profiles of Shear Stress for 1-year to 5-year events

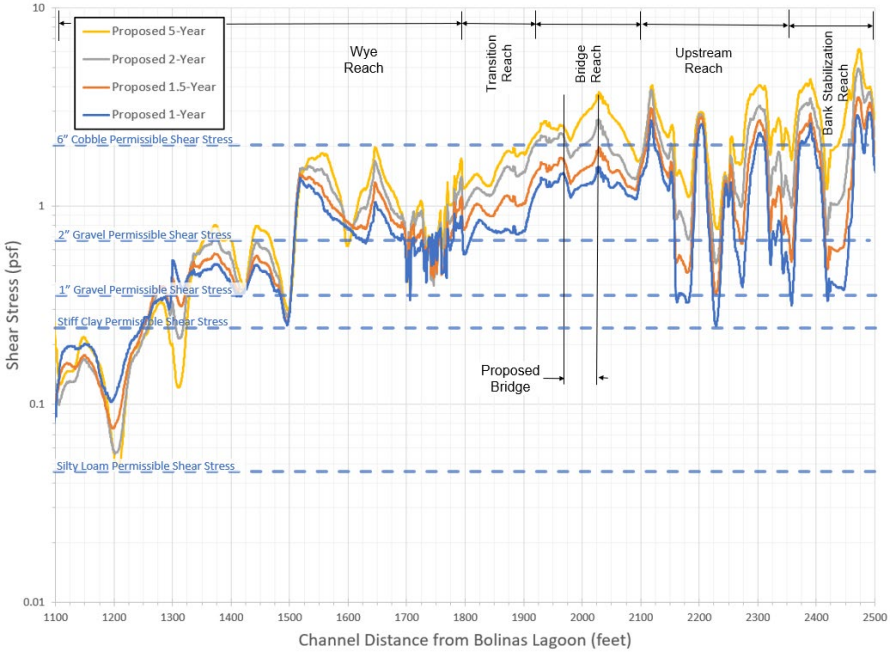


Figure 8. Project Conditions Profiles of Shear Stress for 1-year to 5-year events

Master Response 3: Project Setting

Master Comment Summary: Corrections to reference the correct data in tables within this section. Recommendation to include discussion of the project's impact on SR-1 in the 100-year flow and various Sea-level rise scenarios. Recommendation to consider speed bumps and other measures to prevent negative environmental impacts on Horseshoe Hill Road and elevating the lower segments of Fairfax Bolinas Road.

Caltrans staff provided the following comments regarding IS/MND Section IV – Project Need, Purpose, and Objectives (Page 17):

- In the second paragraph, the reference to the OPC's Table 1: Caltrans staff believe it should reference OPC's Table 13.
- Table 2 uses Sea-Level Rise Predictions of 2.0 feet and 5.5 feet, but OPC's Table 13 it appears these values should be 1.9 feet and 5.6 feet.
- The last sentence notes the project's benefit to Olema Bolinas Road. Similarly, Caltrans staff would recommend including a discussion of the project's impact to SR-1 in the 100-year flow and various Sea-Level Rise scenarios. Inclusion of a Figure (similar to Figure 18) that depicts flooding extent and depths for the existing condition (no improvements) with Sea-Level Rise scenarios would be helpful.

Commenter suggests that some vehicles entering or leaving Bolinas may choose to utilize Horseshoe Hill Road in order to avoid construction traffic and delays. The commenter states that Horseshoe Hill Road is a significant wildlife corridor with poor visibility and multiple bus stops for Bolinas Stinson School and narrows to less than two lanes at its north end. Commenter recommends that the County consider speed bumps, local traffic only signs, or other measures to prevent negative environmental impacts on local wildlife along Horseshoe Hill Road.

Commenter expresses concerns over future sea-level rise impacting the lower segments of the Fairfax Bolinas Road between the Project site and the Mesa Road intersection and suggests that some of the Project's unused spoils be considered for use in elevating this road.

Response

Caltrans makes some suggestions pertaining to the IS/MND's discussion of predicted sea-level rise at the Project site and requests an additional figure depicting the extent of anticipated flooding. With respect to the Ocean Protection Council's (OPC) State of California Sea-Level Guidance (cited on page 17 of the IS/MND), Table 1 in the main document and Table 13 in Appendix 3 to that document present the same information.

The designers of the proposed Project relied upon projected sea-level rise south of Cape Mendocino using 2000 as a baseline (CO-CAT 2013) based on recommendations in the State of California Sea-Level Rise Guidance Document (2013) that were used in the Bolinas Lagoon North End Site Conditions Report (2015). The difference between the sea-level rise guidance used in the Project modeling and that in the 2018 revised guidance from OPC is 0.1 foot. References in the IS/MND have been updated to include all sources used in evaluating and designing the proposed Project for sea-level rise forecasts, as follows (page 17, bottom two paragraphs):

> The Project site is vulnerable to SLR, as well as other climate change-related effects including prolonged drought and storms with high magnitudes and intensities. One of the goals of the proposed Project is to reduce the impact of SLR on the ecosystem and infrastructure. Many projections of SLR exist, and SLR estimates used for the Project are

based on the Ocean Protection Council (OPC) State of California Sea-Level Guidance ~~(OPC, 2018)~~(CO-CAT, 2013).

Improving the resiliency of the wetlands and infrastructure at the Project site is imbedded in the design objectives of the proposed Project. Resilience is the ability to recover quickly from disasters and to adapt to future conditions, such as SLR. To date, the accepted projections used for SLR planning are the State of California Sea-Level Guidance produced by the Ocean Protection Council (OPC, 2018). Using OPC's Table 1 (Projected Sea-Level Rise [in feet] for San Francisco), the Project is within the projections for specific greenhouse gas emissions scenarios (RCPs) for 2090 for low and high emissions (RCP 2.6 and 8.5 respectively), medium-high risk aversion (1 in 200 chance), resulting in up to 5.6 feet of sea-level rise. Table 2 presents the various tide scenarios used for the hydrologic and hydraulic modeling of the proposed Project that were determined by adding the predicted amount of SLR to current documented tide elevations.

The IS/MND references have also been revised as follows (page 216 below the CDFW reference):

CO-CAT. (2013). *State of California Sea-Level Rise Guidance Document.* March 2013 update. Retrieved from http://www.opc.ca.gov/webmaster/ftp/pdf/docs/2013_SLR_Guidance_Update_FINAL1.pdf

The modeling effort for the proposed Project determined that raising sea level (the model downstream boundary condition) to an elevation of 13.5 feet NAVD88 (7.9 feet of SLR above existing condition mean high water mark) would have no effect on the 100-year storm event at the proposed bridge related to water surface elevation, velocity, or shear stress. Therefore, the proposed Project accommodates a predicted sea-level rise of 5.5 feet per CO-CAT 2013 and a predicted sea-level rise 5.6 feet per OPC.

The sea-level rise modeling completed for the proposed Project shows post-Project and no-Project conditions with expected 2100 sea-level rise, showing no impact to the 100-year water surface elevation on SR-1 in the vicinity of the proposed Project. The two figures presented below illustrate these two scenarios. Figure 9 illustrates the existing condition water surface elevation with expected 2100 sea-level rise and Figure 10 illustrates the water surface elevation as it would occur with the proposed Project under the same scenario. Existing elevations of SR-1 southeast of the Project site along the Bolinas Lagoon range from 8 to 11 feet NAVD88. Model outputs show depths of flooding due to sea-level rise on SR-1 in this area ranging from 0 feet northwest of the Wilkins Gulch Creek culvert crossing to 3 feet deep at the Salt Creek culvert crossing. Post-project flooding levels would generally be similar, with flooding at the Salt Creek culvert being reduced as compared to no-Project conditions.

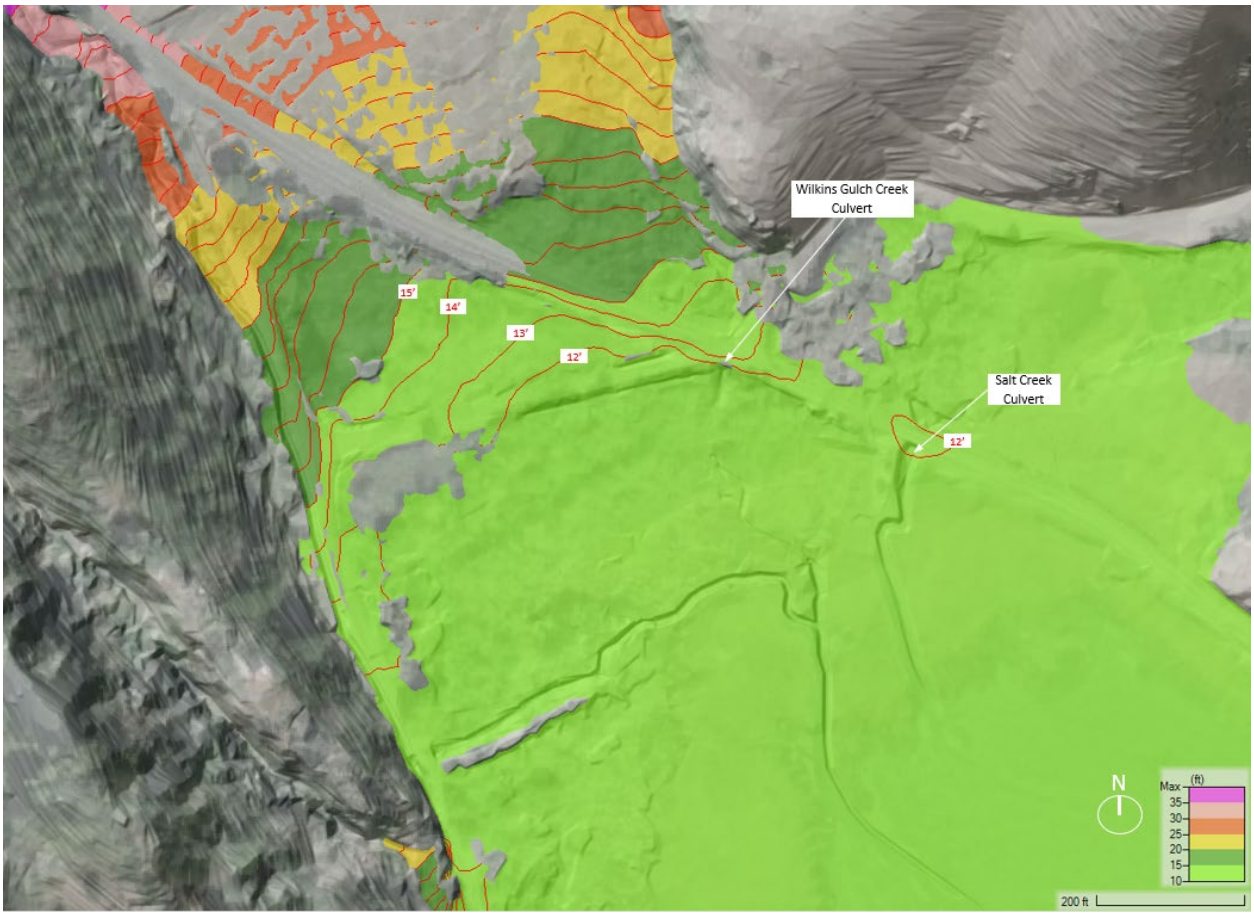


Figure 9. Existing Conditions Water Surface Elevation (ft) Map for the 100-Year Storm Event with Predicted Sea-Level Rise by 2100

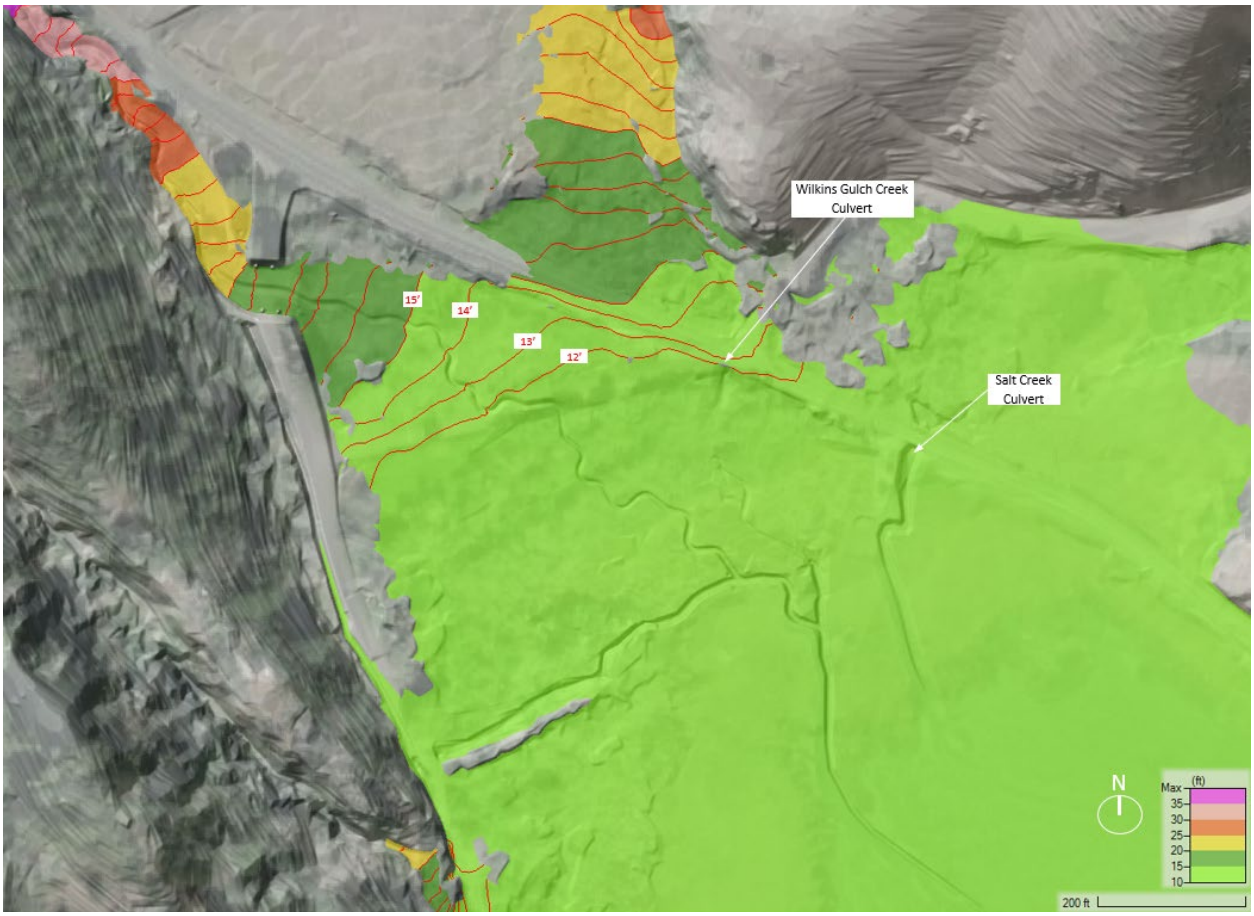


Figure 10. Project Conditions Water Surface Elevation (ft) for the 100-Year Storm Event with Predicted Sea-Level Rise by 2100

There is no "causeway" proposed for the Project. The proposed bridge is approximately seven feet above the creek bed on the upstream side with an open-air clearance height under the bridge of about 3.3 feet from the floodplain of the creek to the nearest concrete deck (4.8 feet from the creek bed). The open-air bridge spans approximately 70 feet across the creek and floodplain. A detailed alternatives analysis was completed by the Project design team and technical advisory committee, along with seismic and tsunami studies, leading to the selection of the current design. The design allows for extreme events, while providing an open corridor for natural channel processes and animal movement beneath the bridge. As shown in Figures 9 and 10, the bridge would allow for safe travel along SR-1 to the north in the event of a 100-year flood event and future sea-level rise up to 7.9 feet.

The IS/MND (starting at page 33) provides a discussion of the background on how the proposed Project was identified and developed by a variety of partners working with the MCOSD over a multi-year period. As discussed therein, the proposed Project is part of a larger vision to protect infrastructure in the Bolinas Lagoon area from the impacts of sea-level rise and is being undertaken primarily as an environmental restoration project on lands owned by the County of Marin and Marin County Open Space District, managed by Marin County Parks and the Department of Public Works. The proposed Project represents one component of what is likely to be multiple efforts surrounding the issues of ecological restoration and sea-level rise resiliency

within the Bolinas Lagoon area. Future efforts to improve the resiliency of SR-1 could be undertaken on lands under the ownership of Caltrans as part of future projects. However, the proposed Project is unrelated to these other efforts from the perspective of CEQA because (1) it has been defined, designed, and funded; (2) can be implemented in the near-term; and (3) can proceed without any additional work beyond that described and evaluated in the IS/MND.

With respect to the comment regarding the use of unused Project spoils material to raise the Fairfax Bolinas Road, the IS/MND states (at page 208) that up to 500 cubic yards of cut soil and demolition materials generated during construction would be trucked out and disposed of at the Redwood Landfill in Novato. Using this material as fill material for a future effort to raise other roadway segments outside of the Project site isn't feasible due to the lack of available space to store the materials on-site or on other County-owned lands. Additionally, much of the material will consist of asphalt and concrete from the demolished roadway segments and may not be suitable for use in an engineered fill context.

With respect to the comment suggesting that construction signage be employed to minimize usage of Horseshoe Hill Road during construction activities for the proposed Project, Mitigation Measure TRAN-02 on pages 84 and 199 of the IS/MND has been revised to read as follows:

> **Mitigation Measure TRAN-02: Construction Signage**
>
> Construction and detour warning signs shall be placed on SR-1 in advance of construction activities along the roadway for both northbound and southbound traffic. Additional signage, as well as traffic control personnel, may be required at the intersection based on proximity of construction activities to the roadway and whether any temporary modifications of the travel lanes are required. Detour signage shall also be placed at both ends of Horseshoe Hill Road, indicating that this route is not suitable for use as a construction zone bypass.
>
> During Year 2 construction, to the degree that construction materials are required to be transported across the road to and from the staging area, temporary traffic control shall be required. To the extent that the staging area encroaches upon the roadway, traffic control may be required to maintain adequate clearances. Construction warning signage shall be stationed upstream of active construction and staging areas.

Master Response 4: Project Description

Master Comment Summary: The rootwads and willows to protect SR-1 at Lewis Gulch may not prevent erosion at high flows. Suggestion to use redwoods instead of coast live oak for rootwads as redwoods last longer. Request for additional information on the stability and engineering calculations for the rootwads' bioengineering design.

Caltrans staff mentions that the Project proposes to use bioengineering (rootwads and willows) to protect SR-1 at Lewis Gulch and that the design figure shows the rootwads in the thalweg of the proposed channel. At low flows this might not be such an issue but at higher flows it may push the core flow energies to the right (looking downstream) such that the inside of the meander could be eroded, or the water may erode under the rootwads causing scour and thus defeating the intended purpose of the bioengineering. Caltrans staff is interested in seeing any additional information on the stability and engineering calculations for this design.

Caltrans staff would like to better understand where the County expects the alluvial fan to occur in the new design and if there is concern the creek might find a new path. Staff note that the lower floodplain is fairly flat and wonders what would prevent the creek from migrating toward SR-1 in the future, causing issues along the embankment?

Caltrans staff suggests using redwoods for rootwads as they have found coast live oak rootwads do not last as long as redwood.

Caltrans staff request that the design calculations supporting the use of rootwads placed on other logs at the toe of slope of the SR-1 embankment be provided.

Response

The rootwad details are being revised in the 90% Project design drawings to provide more channel cross sectional area at the bank stabilization area. In addition, a stone toe is now being proposed to reduce the risk of scour and undermining of the structure. Force-balance calculations are being performed that take into consideration bed material, bank material, channel cross-section geometry, 100-year flow depth and velocity, log geometries, log density, and log positioning relative to the flow. These calculations are presented in Attachment 1 (Large Wood Structure Stability Calculations) to the updated version of the Bolinas Lagoon Wye Wetlands Resiliency Project Hydrologic and Hydraulic Modeling Technical Report prepared by WRA (WRA 2023).

To address the alteration of adding more channel cross sectional area and the stone toe to the proposed Project design, the text of the IS/MND has been revised at page 20 (second full paragraph) to read as follows:

> The toe would be protected by a series of rootwads buried into the bank and bed of the channel on the outside meander bend. The rootwads would sit so they are aligned with the channel bank and their trunks extend into the bank. Two layers of coir fabric-encapsulated soil lifts between 6 and 8 inches in height would be installed above the rootwads along the bank, and a stone toe would be installed to reduce the risk of scour and undermining.

The coast live oak rootwads are available on-site and consistent with the intent of the proposed Project to re-use on-site materials. Given the coastal environment and nearly year-round flow in the creek, the willow poles that would be planted are expected to rapidly grow and provide the long-term stability to the structure. It should be noted that redwood has a very long-life span, which is not typical for species used successfully in log structures in other parts of the country.

The majority of the Project Area is where the historic alluvial fan was for Wilkins and Lewis Gulch Creek (AECOM, 2015). The proposed Project would allow for deposition on the historic alluvial fan below the new bridge and within the vicinity of the existing crossover road segment that would be removed. Modeling of proposed post-Project conditions with end of century sea-level rise shows no impact to SR-1. Thus, the IS/MND concluded that the Project would not result in a potentially significant impact. However, the MCOSD has a robust monitoring and adaptive management program planned as part of the proposed Project. If channel changes occur that could be seen as potentially impacting or migrating towards SR-1, MCOSD would address the issue in consultation with Caltrans to ensure that SR-1 is unaffected.

Master Response 5: Construction

Master Comment Summary: Section VII – Construction lists pile-driving equipment for construction activities, however, the plans show piles to be CIDH piles. If pile driving is not proposed, Caltrans staff recommends removing pile driving from the list of construction equipment.

Response

While pile driving is not anticipated to be necessary to construct the proposed Project, conditions may be encountered that would require the use of pile driving equipment. The IS/MND has been revised to address the potential use of pile driving equipment as follows:

IS/MND page 28 (B. Equipment):

> Construction activities related to realigning the Lewis Gulch Creek channel would involve the use of small excavators, dozers, track trucks, and skip loaders to minimize the disturbance footprint. Dozers, scrapers, excavators, cranes, ~~pile-driving equipment,~~ rollers, compacters, and paving equipment would be used to construct proposed improvements to Olema Bolinas Road and the proposed bridge. The use of pile-driving equipment is not expected to be necessary; however, the presence of certain subsurface conditions that could be encountered on-site (solid rock, non-cohesive soils) could require the limited use of pile drivers.

Master Response 6: Project Development

Master Comment Summary: The IS/MND should address whether there are efforts underway for the National Park Service to expand restoration of the lagoon habitat on its property.

The proposed Project is a part of a larger area that would need to be restored in order to fully restore the Bolinas Lagoon ecosystem. It would be useful for the IS to address whether there are efforts underway for the National Park Service, the agency that owns the adjacent property, to build upon this proposed Project and expand restoration of the lagoon habitat on its property.

Response

The comment references a "larger area" in need of restoration. This larger area is defined in the scope of the Bolinas Lagoon North End Restoration Project (North End Project), which is described in full in the IS/MND (starting at page 35). As noted in the IS/MND, the proposed Project represents a discrete component of the overall vision encompassed by the North End Project. The restoration of lands owned and managed by the National Park Service, which operates the adjacent Golden Gate National Recreation Area (GGNRA) and Point Reyes National Seashore consistent with the vision of the North End Project, would require the elevation of SR-1. At the present time, MCOSD is unaware of specific Caltrans proposals to elevate the highway.

Master Response 7: Air Quality

Master Comment Summary: Recommendations to add language to enhance air quality and reduce greenhouse gas emissions. Recommendations to use an alternative and approved air dispersion model and correction on footnote on IS/MND Table 11.

- Caltrans recommends adding the following regarding air quality and greenhouse gas emissions:
    - Dust control, maintain construction equipment and vehicles, contractor air quality compliance, etc.
    - Regular vehicle and equipment maintenance; limit idling of vehicles and equipment onsite; recycle non-hazardous waste and excess material, etc.
- Regarding Construction Toxic Air Containment Emissions: (IS/MND page 103), Caltrans staff recommends using U.S. EPA's Industrial Source Complex Short Term (ISCST3) air dispersion model to calculate DPM and PM2.5 concentrations, which is no longer an approved model.
- Under the footnote of Table 11: Health Risks at MEIR During Project Construction (IS/MND page 104), Caltrans staff recommends correcting the model name.

Response

With respect to the dust control and equipment maintenance measures suggested in the comment, the IS/MND (at page 100) notes that the air quality conservation measures for the proposed Project (described on IS/MND page 32) include implementation of dust control measures during Project construction activity. In addition, the conservation measures include regular vehicle and equipment maintenance. Thus, the suggested measures have already been included as part of the proposed Project and no additional mitigation is necessary.

With respect to the air quality modeling that was performed for the proposed Project, the Bay Area Air Quality Management District (BAAQMD) guidance for modeling local health risks[1] allows for the use of either the ISCST3 or AERMOD air dispersion models. At the time the IS/MND was prepared, the BAAQMD only had meteorological data available for the ISCST3 model and not AERMOD. Therefore, the analysis was conducted using the ISCST3 model. The BAAQMD has confirmed that this approach is acceptable for a CEQA project-level analysis.

With respect to the comment concerning the source notation for IS/MND Table 11, the IS/MND has been revised to change the source notations for Tables 10 and 11 as follows:

> Source: ~~CalEEMod~~ Air Quality CalEEMod Modeling Results; report is available upon request.

[1] Bay Area Air Quality Management District (BAAQMD), Recommended Methods for Screening and Modeling Local Risks and Hazards. May 2011.

Master Response 8: Biological Resources

Master Comment Summary: Several comments were submitted regarding the general topic of biological resources, including tree mitigation, revegetation, marsh mitigation, invasive plants, and individual special status species.

Wetland Maps

Caltrans staff recommends making Figures 4 and 6 "new wetlands" areas consistent along SR-1 (see IS/MND pages 48 and 50).

Tree Mitigation

Commentor notes that, in order to implement the proposed Project, 123 trees would be removed. The IS/MND reports that 1,246 trees would be planted as mitigation for the loss of the removed trees. While this is a substantial increase in the number of trees, the IS/MND should provide more information to enable more complete evaluation of the mitigation. The species of trees planted should be listed. They should be of the same native species that would be removed.

Revegetation

Commenter notes that a survey for rare plants was conducted and none were found in the Project area, but suggests that, if topsoil is needed to achieve the desired grade after removal of invasive plants, care be taken to use soil that is not infested with invasive plant material, seeds, roots or propagules.

Commenter states that it appears that more than one classification scheme has been used to characterize vegetation in the Project area. The first appears under the detailed descriptions of Project elements, in IS/MND Section I, Long-Term Revegetation Management Actions. The text in Subsection ii, Plant Palettes (IS/MND page 26), states "As described below, there are nine vegetative communities mapped on the site." In fact, there is no further description of these communities, and only eight are listed. Although not further described, these communities form the basis of the plant palettes for revegetation, mapped as they would be installed in two phases, in IS/MND Figures 13-17.

A second characterization of vegetation appears in the Biological Resources section of the IS/MND, which notes on Page 106 that 15 natural communities are present in the project area, 13 of which are "sensitive." The categories, based on their wetland type plus three upland categories, are listed, along with their typical plant species, in Table 13. They do not readily correspond to the communities listed on Page 26. Although the term "coastal brambles" appears in both classifications as a plant community present in the proposed Project area (and included among the revegetation planting palettes), it does not appear in Table 13, nor are its dominant species identified anywhere. (Further investigation reveals that "coastal brambles" – also called "berry brambles" – consists primarily of three species of Rubus [native blackberry] and is listed in the California Natural Diversity Data Base as a "sensitive" natural community in California.) Figures 23 and 29 map the distribution of "Biological Communities" before and after restoration, respectively, using the wetland-based listing of communities in Table 13. Neither "Coastal Brambles" nor the other vegetation categories in the revegetation plan appear in Figure 29 – the post-restoration biological communities.

Special-Status Species: Ring-Tailed Cats

Commenter states that ring-tailed cats (*Bassariscus astutus*), which the IS/MND says have not been documented in the vicinity of the study area, are occasionally seen around Bolinas Lagoon.

There is a ring-tailed cat in the Cal Academy collection that was found dead at a residence along Bolinas Lagoon back in 1986. According to local natural history expert of Bolinas, Keith Hansen, there have been various sightings around the lagoon over the past decades, including recent ones in 2023 along Horseshoe Hill Road. Commenter states that it is unlikely that the project would impact ring-tailed cats.

Special-Status Species: California Black Rail

Commenter expresses confidence that the proposed Project would restore natural processes to the Bolinas Wye Wetlands for fish, amphibians, bats, and birds like the Black Rail. Additionally, the Project would help mitigate chronic flooding along the Bolinas-Olema Road that occurs regularly, but notes that additional efforts to address flood issues along the rest of SR-1 along Bolinas Lagoon would also be necessary in the near future.

Commenter notes that the proposed Project is outlined in the North End Study, but that there appears to be a contradiction between the North End Study and IS/MND with regard to the California state threatened California black rail (*Laterallus jamaicensis coturniculus*). The North End Study does not indicate any black rail habitat in Lewis Gulch Creek. In contrast, the IS/MND (at page 11) states (without citation) "Lewis Gulch Creek is known to have a population of...California state threatened California black rail." The contradiction between these two documents should be clarified.

Commenter also requests further clarification for two sentences on IS/MND page 12. The first sentence notes "A recent U.S. Geological Survey (USGS) report (Thorne, et al., 2016) found that by 2100, Bolinas Lagoon's low tidal marsh would be completely submerged with 1.4 feet of sea-level rise. A large portion of this marsh loss would be habitat for the state-listed California black rail..."

The following sentence notes, "As discussed in the AECOM Site Conditions Report (AECOM, 2016), one of the most important benefits of the proposed Project is to address mid- to late-century sea-level rise projections and ameliorate potential wetlands loss due to sea-level rise by restoring natural hydrological and geomorphic processes and removing barriers to upland migration." Together, the two sentences imply that the proposed Project would restore natural hydrological and geomorphic processes and remove barriers to upland migration for the black rails that the first sentence calls out as particularly at risk, but the IS/MND does not appear to support this implication. For example, IS/MND Figure 23 shows tidal marsh (presumed black rail habitat) present now, but Figure 18 shows that same black rail habitat under water in 2050.

Commenter states that IS/MND page 10 notes, "The new approach to SR-1 would include a bridge over Lewis Gulch Creek that would allow for lateral stream migration and provide a wildlife corridor." While a wildlife corridor would be useful for many species as Sea-level rise pushes their habitats upland, it does not appear to function that way for black rails. IS/MND Figure 18 indicates that in 2050, Lewis Gulch Creek above the new bridge appears to be an incised channel with limited to no black rail habitat.

Commenter asserts that the proposed Project appears to do nothing for black rails other than temporarily postpone the elimination of their habitat in the area, and suggests that a different project that could benefit black rails is a Caltrans culvert replacement to restore natural hydrological and geomorphic processes and remove barriers to upland migration on Wilkins Gulch Creek, Salt Creek, Pike County Gulch, and the creek at Audubon Canyon Ranch. Comment states that the IS/MND should eliminate any implication that it would benefit black rails.

Commenter states that the IS/MND (on page 34) may also exaggerate the Project's black rail benefits, where it states that "several notches would be created in the existing berm/dredge spoils pile to the south bank of the creek. The notches would allow flood flow conveyance, while providing high ground refugia for species such as California black rail." The comment states that such "island" rail habitats are known to be death traps, not refugia, as the island's restricted area facilitates predation of the rails. Instead of islands to retreat to at high tides, black rails need to retreat to contiguous and continuous tidal uplands. The commenter suggests that the proposed Project should entirely remove the berm/spoils pile (and the reference to the proposed notches benefiting black rails should be removed from the IS/MND).

Commenter states that the inclusion of a figure showing areas of the Project suitable for black rail nesting as well as areas suitable for high tide refugia would be helpful. IS/MND Figure 29 shows the habitat map after restoration in 2025, while Figure 18 shows most of the Project area under water in 2050 (due to sea-level rise plus storm surge). There is no figure showing habitat changes in the interim 25 years between restoration and 2050. This interim is particularly important regarding black rails, because it appears that virtually their entire habitat within the Project area would be under water by 2050.

Commenter states that the predicted increase in the Project's black rail refugia is un-quantified in the IS/MND and thus is speculative. Comment goes on to state that the predicted increase in future refugia area would have no meaning if the rails that would use the refugia are no longer present in a tidal marsh that has been diminished in size, a reduction that the IS/MND does quantify as a 0.04 acre decrease in tidal marsh area due to the widening of Lewis Gulch Creek (Figure 29 vs Figure 23). The predicted increase in the Project's black rail tidal habitat is also not quantified in the IS/MND and thus is also speculative. The IS/MND states that restoration of the Creek above the new bridge would accommodate a 1.5-year bankfull flow but does not appear to specify the projected bankfull event frequency below the bridge. It was stated elsewhere that the Creek below the bridge would accommodate a 1-year bankfull event, which means that the Creek would deposit a considerable amount of its sediment onto the floodplain. Thus, an unquantified but likely comparatively small amount of sediment would be deposited past the mouth of the Creek to increase the tidal marsh area that was posited as offsetting the Project's 0.04-acre reduction in tidal marsh area. There is no data to support the assumption that this relatively small amount of deposited sediment would outpace sea-level rise such that this new sediment would actually create any tidal marsh usable by black rails.

Commenter states that a decrease in tidal marsh area that is current and certain cannot be offset or mitigated by an increase in tidal marsh area that is future and speculative. Comment states that this 0.04-acre loss should be mitigated on a 2-to-1 basis (0.08 acres of constructed tidal marsh). The comment goes on to suggest that opportunities exist in the Lagoon to add 0.08 acres of new tidal marsh. One opportunity might be to use soil excavated for the removal of the segment of the Fairfax Bolinas Road that now runs through the Project site. That soil could be added to the current subtidal area below the current mouth of Lewis Gulch Creek to create the 0.08 acres of tidal marsh that is speculated to be created in the future as the restored Lewis Gulch Creek deposits an unquantified amount of excess sediment in the Lagoon.

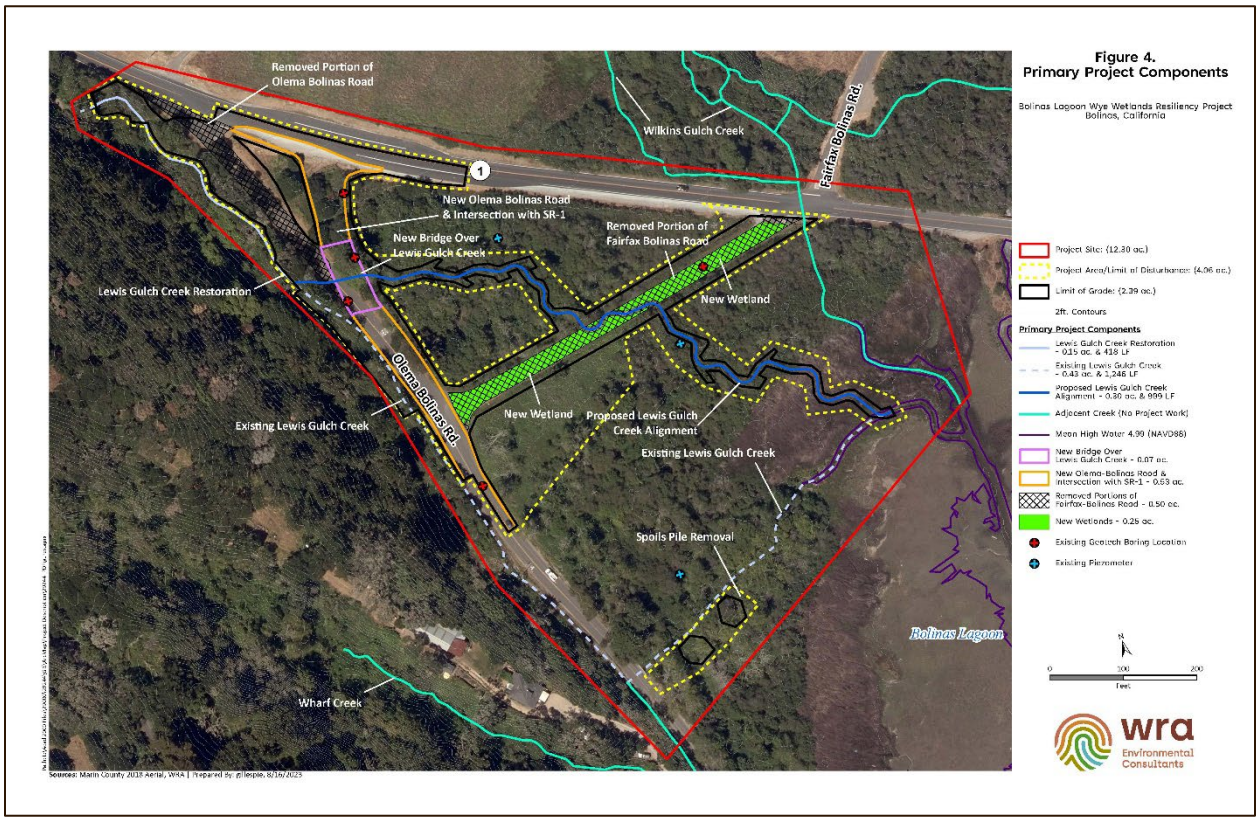
Another opportunity may be to restore 0.08 acres of Winnebago Point, which is adjacent to known black rail habitat. The commenter believes that Winnebago Point belongs to Audubon Canyon Ranch, although Caltrans has used the Point to store spoils collected off SR-1. Audubon Canyon Ranch may be interested in allowing 0.08 acres of new black rail habitat to be created.

Commenter notes that the proposed Project would cut notches in a spoils pile that would create islands of high tide refugia for black rails. The IS/MND provides no predation data to document the predicted benefit to black rails from the notching that would create islands, which are known to facilitate predation of rail species. Commenter acknowledges a lack of technical expertise on black rails and states that the views of the Project's Technical Advisory Committee regarding the spoils pile should be deferred to on this subject.

Response

Wetland Maps

IS/MND Figure 4 (Primary Project Components; page 46) has been revised as below for consistency with Figure 6 (Work Areas and Temporary Staging/Stockpile Areas Year 1) with regard to the areas shown as "New Wetlands".



Revised IS/MND Figure 4: Primary Project Components

Tree Mitigation

The intention of the proposed Project's revegetation component is to replace removed native trees with the same species within suitable habitat areas on-site, keeping in mind that one of the anticipated Project outcomes is a shifting of tree habitat zones within the Project site due to expansion of the Lewis Gulch Creek floodplain. To address the comment, the IS/MND (pages 127-128) has been revised as follows:

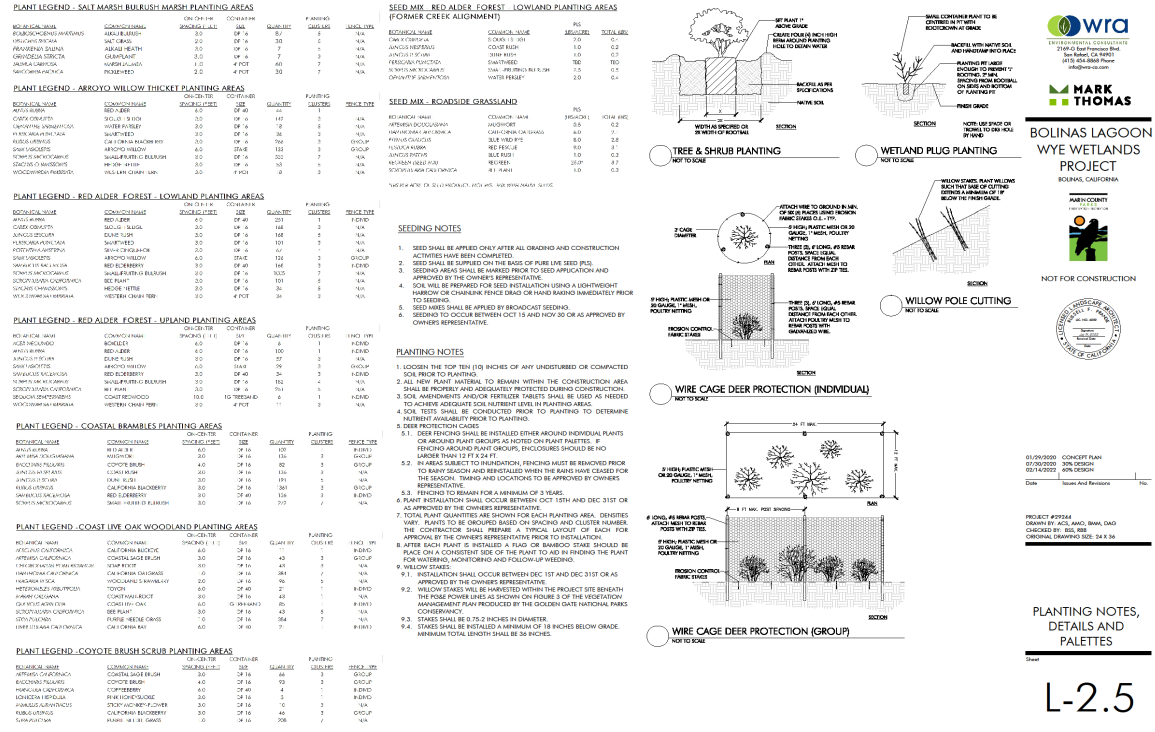
Riparian Tree Removal – Less Than Significant with Mitigation Incorporated

An arborist report has been prepared to document existing trees on the Project site (WRA, 2021). Because the Project site is located within the Coastal Zone, the Marin County Native Tree Protection and Preservation ordinance does not apply. A total of 214 trees were identified within or directly adjacent to the Project site. Of these, 123 are proposed for removal during implementation of the Project. The proposed Project will require the removal of trees within oak woodland, forested wetlands, riparian, and similar habitats to accommodate grading and restoration of the new channel, relocation of the road at the junction of Olema Bolinas Road and SR-1, as well as construction of the new bridge. Trees within these habitats are subject to regulation by CDFW and RWQCB. These impacts would represent a significant impact to these communities if not mitigated. Mitigation Measure BIO-6 requires the replacement of the removed trees with a total of 1,246 trees within Project site boundaries. These newly planted trees would be of the same native species as the removed trees at the ratios and locations shown on the final Vegetation Management Plan for the proposed Project. With the implementation of Mitigation Measure BIO-6, impacts to riparian habitats would be less than significant.

Revegetation

With respect to topsoil quality, topsoil used to reach the desired grades would not be infested with invasive plant material, seeds, roots or propagules. The Golden Gate National Parks Conservancy (Parks Conservancy) would be conducting vegetation management and control of invasive species in the Project area pre-, during-, and post-construction of the Project and would take care to remove invasive plant material, roots and/or propagules from the ground surface to the greatest extent possible. The work would be guided by the Project Vegetation Management Plan, which was developed by the Parks Conservancy, MCOSD, and WRA to address the vegetation management portion of the proposed Project, including invasive species management and revegetation of disturbance areas. This plan identifies the non-native invasive species (NNIS) present in the Project area and outlines individual treatment plans for each invasive species. The Plan aims to both prevent the spread of NNIS as well as reduce overall NNIS cover.

With regard to the revegetation plan illustrations in the IS/MND, Figure 29 was only intended to illustrate an overview of restored habitats within the Wye after restoration. The plant communities listed in Table 13 of the IS/MND are for a larger study area that includes lands of NPS, and therefore, not all communities shown on Table 13 are present within the Project site. The IS/MND has been revised to add a new Figure 31, Proposed Revegetation Planting Palettes, as shown below.



Revised IS/MND Figure 31: Proposed Revegetation Planting Palettes

The nine distinct planting palettes are shown on Figure 31. The proposed Project planting plans are provided on Figures 13–17 of the IS/MND and illustrate the post-restoration condition based on the phased revegetation plan. The revegetation plans do not identify plants to the Alliance level, as in Table 13, due to the uncertainty that surrounds which native species will dominate due to minute changes in elevation and soil conditions that could deviate from the design due to several variables related to construction, channel evolution, and changes in groundwater elevation.

The Golden Gate National Parks Conservancy is working with WRA and the County to further refine the planting areas and planting palettes. An updated Vegetation Management Plan and a Riparian Revegetation Monitoring Plan and vegetation communities map will be created as part of the 100% design package for the proposed Project. The Parks Conservancy would implement the final Project Vegetation Management Plan, which would include revegetation of disturbance areas post-construction and invasive species management pre-, during-, and post-construction.

Special-Status Species: Ring-Tailed Cats

Table 15 of the IS/MND (at page 120) has been revised at the Ring-tailed cat row under the "Potential for Occurrence" column to read as follows:

> No Potential. This ~~is a wideranging~~ secretive species ~~that uses a variety of woodland habitats. This species has never~~ has not been documented in the vicinity in any official database (e.g., CNDDB) and given that the Study Area is surrounded by roads it is unlikely the species would ~~remain undetected~~ occur due to the high levels of anthropogenic disturbance.

Special-Status Species: California black rail

At the time the North End Study was prepared, surveys specifically for black rails had not been conducted within the northern end of Bolinas Lagoon. Subsequent to the writing of the North End Study, protocol level surveys were conducted by Point Blue Conservation Science in 2022[2], and the draft IS/MND includes the results of those surveys. Those surveys identified black rails within the northern marshes of Bolinas Lagoon; however, no nesting black rail activity was documented within the Project Area near where the channel would be constructed. Therefore, black rails are considered present.

The commentor asserts that there is a conflict between the proposed Project goals and the report by the USGS on sea-level rise, as the USGS report shows that the extant marsh would be submerged by 2100. The commentor compares IS/MND Figure 23 (marsh habitat within the Project Area) to IS/MND Figure 18 (projected flood waters during a 100-year flood event, in the year 2100) suggesting that the proposed Project would not benefit black rails. The commentor states that the lack of habitat outside of the Project Area during a 100-year flood suggests that the proposed Project would not benefit rails. However, it is important to recognize that a 100-year flood event is not indicative of typical winter events, nor of daily conditions throughout the rest of the year. The removal of the Crossover Road would eliminate barriers to wildlife movement and allow for upgradient habitat migration to accommodate sea-level rise, which addresses these concerns. By removing the Crossover Road and restoring the historic alignment of Lewis Gulch Creek, the proposed Project would allow wetland and marsh habitats to naturally migrate northward, offsetting the potential loss of marsh habitat due to sea-level rise. As such, because the Project would allow natural sedimentation processes (see Master Response 2) to promote marsh habitat migration upslope, it would not contribute to the elimination of black rail habitat in the Project area.

With respect to the comment that the IS/MND overstates Project benefits to black rail, it is acknowledged that rails will move higher into the marsh seeking temporary refugia during high tides and flooding events. Therefore, leaving portions of the berm could benefit rails by providing upland refuge. This would not necessarily increase predatory pressure on black rails since the berm represents only a small topographic variation within the marsh and it would be revegetated per the Project planting plans to provide adequate cover for black rail, which would likely reduce the predation pressure.

The proposed Project would have a less-than-significant impact on black rail individuals with the implementation of Mitigation Measure BIO-3 (California Black Rail), which would require pre-construction protocol surveys to determine if black rail territories are present within 100 meters of the area of proposed work, would require biological monitoring during construction, and would require that buffers be established within allowable work windows. Additionally, the proposed Project would provide a net benefit to black rail habitat in the long-term by permitting the establishment of new wetland and marsh habitats within the Wye.

In response to the request for habitat mapping in the years 2050 and 2100, it would be impossible to accurately predict interim habitat conditions due to the dynamic nature of the

[2] Elrod M., and Wood, J. 2022. Point Blue Conservation Science. 2022 California Ridgway's Rail (*Rallus obsoletus obsoletus*) Summary Report to County of Marin. 16 December 2022. Page 16.

design and modeling uncertainties concerning the rate, and timing of future sea-level rise, as well as future intensities of storms with climate change. The increased deposition of sediment by the restored Lewis Gulch Creek alignment would benefit black rails by adding tidal marsh habitat in the future and the proposed Project would create more upland refugia for black rails. Project goals listed in Table 1 (on page 14) of the IS/MND include that the proposed Project would restore natural geomorphic processes such that wetlands, tidal marsh, and the animals within, would have the ability to naturally adapt to changing conditions in response to sea-level rise. The proposed Project would restore natural flooding and alluvial fan processes, including the deposition of nutrient rich sediment, in the Bolinas Wye wetland where it is needed for wetland accretion to keep pace with sea-level rise (see discussion on page 174 of the IS/MND). In addition, the proposed Project would remove the Crossover Road; turning developed surfaces, which act as barriers to marsh expansion and wildlife movement, into forested wetlands. Removal of the Crossover Road would allow for northward migration of both tidal marsh and wildlife.

The commentor states that Figure 18 demonstrates there will be no habitat for black rail in 2100. However, since marsh habitats would likely migrate upslope over time as elevational changes occur within the Wye floodplain in response to the Project, it is reasonable to assume that suitable rail habitat will evolve (C-SMART, 2016 and C-SMART, 2018). Regardless, the extent of the 100-year flood would not be exacerbated or made worse by the proposed Project; thus, the proposed Project does not need to incorporate mitigation for the impact of future flooding in 2100.

The commentor states that 0.04 acres (about 1,700 square feet) of tidal marsh will be lost and explains why 0.08 acres of mitigation is necessary. The suggestion to lower the elevation of 0.08 acres of the forested wetland adjacent to the current tidal marsh would, if implemented, actually reduce the area available for tidal marsh habitats to migrate upslope. The comment also includes options to convert subtidal habitat to marsh to mitigate the loss of 0.04 acres of tidal marsh. Implementation of these suggestions would require the deposition of fill in jurisdictional waters, which would actually increase the overall Project impact footprint and would be counter to Project goals and objectives. Tidal marsh is not being lost, it is being converted to another aquatic, natural habitat, as detailed in Table 17 (page 131) of the IS/MND, and therefore no mitigation is required. It is also important to note that the area of marsh that would be converted to intermittent channel is not in an area where black rails were documented to be present in 2022. As noted on page 138 of the IS/MND, the functional uplift to habitat value as a result of the proposed Project would be sufficient to offset any minor conversion of habitat that would be necessary to implement the Project. The amount of tidal marsh that would be converted to another aquatic, natural habitat (intermittent waters), would be approximately 0.03 acre, as detailed in Table 17 (page 131) of the IS/MND. As shown in the same table, the Project would result in the enhancement of 0.13 acre of tidal marsh. This enhancement of tidal marsh habitat would compensate for the loss of 0.03 acres of tidal marsh. Furthermore, there is “no net loss” of wetland habitats since the Project would result in a net increase in wetland habitats after the removal of the Crossover Road, and would also enhance existing wetland habitats. Therefore, no mitigation is required.

The commentor reiterates that the proposed Project would create “islands” which would increase predation on rails, yet provides no evidence to support this claim. As noted above, excavating notches in the berm would allow rails to more readily migrate upslope during high tide events, thereby removing the potential barrier created by the current berm configuration. To the point raised by the commenter regarding black rail expertise, Jules Evans, a recognized rail

expert, participated in the Project's Technical Advisory Committee and was consulted during the drafting of the black rail mitigation measures for the IS/MND.

Master Response 9: Cultural Resources

Master Comment Summary: Caltrans disputes the conclusion in the IS/MND that SR-1 is eligible for the National Register based on the information provided. Suggestion is made to mention Dr. Marty Griffin and his colleagues at Audubon Canyon Ranch and their efforts to protect Kent Island from being developed.

Caltrans staff states that the Cultural Landscape Report (CLR) prepared in compliance with CEQA, Section 106 of the National Historic Preservation Act and NEPA for the Bolinas Lagoon Wye Wetland Project, evaluated three road segments (SR-1, Olema Bolinas Road, and Crossover Road) within the Project area. The CLR determined them eligible for the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register) and concluded that, when combined with a portion of the already listed Wilkins Ranch (a contributing feature of the Olema Valley Dairy Ranches Historic District), it creates a National Register eligible Cultural Landscape. Caltrans, as the owner of SR-1, was not consulted on the evaluation of its facility. Determining a State-owned facility to be a historic property eligible for the National Register would make it a Public Resource Code (PRC) 5024 State-owned historical resource. The comment additionally requests that any treatment or mitigation measures developed for SR-1 should be completed in consultation with Caltrans pursuant to Section 106.

Caltrans staff go on to state that the IS/MND asserts that the segment of SR-1 within the study area is eligible for the National Register and California Register because it was constructed during the period of significance (1856-1961) of the Olema Valley Dairy Ranches Historic District and has a shared historic context with the district (IS/MND page 141). However, the period of significance for the Olema Valley Historic District is 1856-1958. Additionally, the segment of SR-1 was not constructed until the mid-1950s, and as such does not appear to contribute to the historically significant developments of agriculture, transportation and tourism. Furthermore, the Olema Valley Dairy Ranches Historic District National Register Nomination does not discuss or include any of the three roadway segments analyzed for this Project. It is Caltrans' assessment that the SR-1 segment is not eligible for the National Register based on the information provided.

Comment states that the IS/MND (at page 145) says "The Marin Conservation League had succeeded in preserving part of the Tomales Bay shore, but most of the bay, Point Reyes, Olema Valley, and the Bolinas Lagoon regions remained unprotected and open to development." While there is no doubt that the Marin Conservation League played a key role in protecting the referenced areas, it would be remiss for the IS/MND not to mention the at-least-equal if not more important protective role played by Dr. Marty Griffin and his Audubon Canyon Ranch colleagues in saving Kent Island from being developed into a Bolinas Lagoon marina and purchasing multiple parcels along Tomales Bay to prevent large scale corporate development.

Response

The Cultural Landscape Report (CLR) analysis has been revised with respect to its area of potential effect, evaluations, and recommendations. The revised CLR includes a formal initiation of consultation with Caltrans District 5 by letter. The revised CLR provides that the SR-1, Olema Bolinas Road, and Crossover Road segments and the cultural landscape as a whole are not National Register- nor California Register-eligible. Therefore, SR-1 is no longer recommended as a Public Resource Code (PRC) 5024 State-owned historical resource. Because no National Register nor California Register-eligible historical resources were identified within the proposed Project's area of potential effect, no treatment plans nor mitigation measures would now be

required pursuant to CEQA Guidelines and the Project's impact on the cultural landscape and historic resources is concluded to be less than significant.

The IS/MND has been revised to reflect the conclusions of the revised CLR. Specific revisions are as follows:

Table 1. Cultural Resources Checklist Questions *(page 140) :*

Would the project:		**Potentially Significant Impact**	**Less than Significant with Mitigation**	**Less-than-Significant Impact**	**No Impact**
a)	Cause a substantial adverse change in the significance of a historic resource pursuant to §15064.5?	☐	☒	☐	☒
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Page 140, first paragraph under Cultural Landscape Report:

Yarbrough Architectural Resources (Yarbrough) prepared a Cultural Landscape Report (CLR) for the proposed Project in February 2023 and a revised version in September 2023 (Yarbrough, 2023). The CLR is a technical study informing Section 106 of the National Historic Preservation Act (NHPA) and National Environmental Policy Act (NEPA) compliance by the Corps, San Francisco District and the CEQA compliance led by Marin County Parks and Open Space District. The CLR's contents follow Part 1. Guidance from A Guide to Cultural Landscape Reports: Contents, Process, and Techniques (USDOI-NPS, 1998).

Page 141, first and second full paragraphs:

Based on the literature review and site surveys, Yarbrough identified ~~one known architectural resource and a~~ three segments of linear landscape features (Olema Bolinas Road, SR-1, and the Crossover Road). Yarbrough recommended that there was no unified cultural landscape ~~comprised of~~ but three road segments, and their densely vegetated roadside settings~~, and the Wilkins Ranch~~ within the APE. The roads and setting that comprise the cultural landscape features within the APE appeared not to be potential historical resources pursuant to CEQA ~~and~~ nor historic properties ~~subject to~~ following NHPA compliance standards. ~~As a result,~~ Yarbrough recommended the CLR as an analytical format to recommend whether or not the subject resources met the regulatory thresholds for historical significance, namely meeting the criteria of the National and California registers. Specifically, the CLR recommends that the Olema Bolinas Road, Crossover Road, and SR-1 ~~road~~ highway segments are not eligible for the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR) under any criteria ~~A/1 (a resource that is identified with an important event in history)~~

~~and C/3 (a resource that is identified with important movements in or masters of design and construction) and that the Fairfax Bolinas Road/Crossover Road/Sausalito Road Segment is eligible for the NRHP and CRHR under criteria A/1~~.

Per 36 CFR Section 800.4(b)(1), the lead federal agency is instructed to make a "reasonable and good faith effort" to identify historic properties within an undertaking's APE. As the road segments have not previously been ~~formally~~ evaluated for eligibility for nomination to the NRHP nor the CRHR, the CLR ~~must~~ considers ~~whether or not the~~ that no cultural landscape nor ~~and its~~ character-defining features are present within the APE~~retain sufficient historical integrity to continue to convey significant historical associations~~. Only if NRHP or CRHR-eligible resources were present would the CLR consider sufficient aspects of historical integrity, namely the ability to continue to convey significant historical associations. Olema Bolinas Road, Crossover Road, and SR-1~~, and Fairfax Bolinas Road~~ are lengthy transportation corridors, and ~~their~~ evaluation of their entirety is well beyond the scope of the current Project APE boundary. However, these three road~~s~~ segments do not ~~all~~ appear to meet the criteria of CRHR ~~and~~ or NRHP. Olema Bolinas Road and SR-1 are linear features that pass through the District but are not listed as contributing features of the District. ~~shown to be significant largely based on the NRHP listing of the roads as features of the District~~. The Fairfax Bolinas Road has been the subject of important scholarship by Marin County historian Brian K. Crawford but is separate from the Crossover Road. No segment of the Fairfax Bolinas Road falls within the APE. The ~~Fairfax Bolinas Road/Sausalito~~ Crossover Road analysis below recommends this ~~road~~ segment ~~to also be~~ is not CRHR- and NRHP-eligible. A detailed analysis and evaluation of the historical significance of each road segment can be found in the CLR. The CLR concludes that ~~all~~ none of the three segments (Olema Bolinas Road, SR-1, or Crossover Road) within the APE are recommended as "historic properties" under NHPA's establishing legislation 36 CFR § 800.16 nor Section 110 [16 U.S.C. § 470h-2(d)] for SR-1 and per Section 106 (36 CFR § 60.4) for all three segments nor ~~and~~ as "historical resources" per CEQA Guidelines' C PRC Section 5024.1.:

- Olema Bolinas Road Segment is recommended as ineligible for the NRHP and CRHR ~~under criteria A/1 and C/3~~;
- SR-1 Segment is recommended as ineligible for the NRHP and CRHR ~~under criteria A/1 and C/3~~;
- ~~Fairfax Bolinas Road/~~Crossover Road~~/Sausalito Road Segment~~ is recommended as ineligible for the NRHP and CRHR ~~under criteria A/1~~;
- ~~All three segments' Period of Significance is recommended as dating from 1856 through 1961 in concurrence to thematic significances determined for the Olema Valley Dairy Ranches Historic District;~~
- ~~All three segments are recommended to have retained sufficient integrity to convey their historical significance.~~

Pages 144 and 145, split paragraph:

The Wilkins Ranch, a contributing property of the Olema Valley/Lagunitas Loop Historic District, is ~~identified as within the indirect~~ located northeast of the APE boundary. William Wallace Wilkins moved to California from Massachusetts in 1849 and managed Isaac Morgan's Belvedere Ranch by the early 1850s. Wilkins bought an interest in Morgan's ranch property. Wilkins Ranch operated as a dairy, and by the 1900s, produced 2,250 pounds of butter per month from 64 cows. The Wilkins Ranch benefited from transportation infrastructure that brought dairy products from a district of ranches to the

fast-growing market of San Francisco and the greater Bay Area (Livingston, 1995). The dairy remained family owned and operated until the mid-1960s and the ranch was sold in 1970 to Nicholas Charney, who transformed the ranch into "a communal experiment in creative agriculture and living (Livingston, 1995). In 1973 the ranch was sold to the Trust for Public Lands and subsequently transferred to the National Park Service.

Page 145, "Historical Roads" paragraph:

Pioneer dairymen found adequate supplies of feed and water in the Olema Valley, and forests of Douglas fir, oak and other trees, which covered most of the west slope of the valley, supplied their firewood and lumber needs. The roadways between Olema, Bolinas, and Bolinas Bay southward remained undeveloped trails in 1860 (Livingston, 1995). One of these roadways was Olema Bolinas Road and in 1865 Marin County Surveyor Hiram Austin laid out improvements to all for year-round use by horse and oxen drawn cart. The improvements to the alignment and surface were completed in 1867. In 1878, the road at the Wye at the north end of the Lagoon (current APE) was constructed using wood boards to allow for travel between the east side of the Lagoon further north (GFNMS, 2008). The "Wye" was the intersection between Olema Bolinas Road (running east-west) and ~~Fairfax Bolinas Road (also~~ Crossover Road; running north-south~~)~~, providing the original connection between these transportation corridors. After the completion of a railroad in 1874 to Tomales Bay, access to markets became quicker and more cost-effective. The railroad, improvements to Sausalito Road, and construction of the Fairfax Bolinas Road brought tourists and encouraged the development of a tourist industry centered around Stinson Beach, Bolinas, and up to Tomales Bay.

Page 145, first paragraph under "Tourism and Land Use":

The railroad was a powerful incentive for opening up the Olema Valley area to tourism, and made it easy for San Francisco residents to travel to Marin County for weekends and vacations. Tourists began visiting ~~the~~ western Marin County in the early 1870s, after the inauguration of ferry service from San Francisco to Sausalito (Blackmore, 2019)

Page 149, discussion under Checklist Question (a):

a) Would the Project cause a substantial adverse change in the significance of a historic resource pursuant to §15064.5?

~~Less-than-Significant~~ No Impact ~~with Mitigation Incorporated~~

Yarbrough prepared a CLR for the proposed Project and identified a cultural landscape consisting of three road segments and~~,~~ their immediate settings~~, and a portion of the Wilkins Ranch~~ within the APE. ~~All~~ None of the three road segments were found to be NRHP- and CRHR- eligible~~,~~; therefore, no ~~the cultural landscape as a whole is recommended as a~~ historic property per NHPA ~~and as a~~ nor historical resource pursuant to CEQA are present within the APE. Under CEQA, if a project may cause a substantial adverse change in the characteristics of a resource that convey its significance or justify its eligibility for inclusion in the CRHR or a local register, either through demolition, destruction, relocation, alteration, or other means, then the project is judged to have a significant impact on the environment [CEQA Guidelines, Section 15064.5(b)]. However, without the presence of such a resource, no impact is possible. ~~Direct impacts may occur by:~~

- ~~Physically damaging, destroying, or altering all or part of the resource;~~
- ~~Altering characteristics of the surrounding environment that contribute to the resource's significance;~~
- ~~Neglecting the resource to the extent that it deteriorates or is destroyed. Indirect impacts primarily result from the effects of project-induced population growth. Such growth can result in increased construction as well as increased recreational activities that can disturb or destroy cultural resources; or~~
- ~~The incidental discovery of cultural resources without proper notification.~~

~~CEQA provides guidelines for mitigating impacts on significant historical resources in Section 15126.4. For historical architectural resources, maintenance, repair, stabilization, restoration, preservation, conservation, or reconstruction in a manner consistent with the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties generally will constitute mitigation of impacts to a less-than-significant level (Grimmer, 2017).~~ The CLR concludes that the Project presents ~~a less-than-significant impact with mitigation~~ no impact ~~on~~to the ~~cultural landscape as a historical resource, comprised of~~ three road segments~~, their setting, and the Wilkins Ranch~~ within the APE.

Therefore, no historic resource pursuant to §15064.5 is present and the Project poses no Impact to historical resources. ~~With the implementation of Mitigation Measure CUL-1, impacts to historical resources would be less than significant.~~

Pages 80 and 149, Mitigation Measure CUL-1:

~~Mitigation Measure CUL-1: Historical Resources~~

~~If the SHPO concludes that the three road segments constitute a historic resource, the Project shall develop a Built Environment Treatment Plan (BETP) to resolve adverse effects and reduce the significance of impacts under CEQA to a less-than-significant level. The BETP should propose public interpretation and recordation measures that find acceptance from the Corps, SHPO, and the Marin County Parks and Open Space District in order to jointly address federal and state mandates to mitigate adverse effects and impacts. The BETP shall be attached to a Memorandum of Agreement between the Corps, the California SHPO, and the Advisory Council for Historic Preservation. The same BETP shall be used to reduce adverse CEQA impacts to a less-than-significant impact to historical resources.~~

Page 150, third and fourth paragraphs:

~~Prior to the establishment of the Fairfax Bolinas Road/Crossover Road, the "Sausalito Road" was present within the Project site as early as 1868, if not earlier. It is not known when the Crossover Road subsumed this older road (possibly in the mid-1950s when the current alignment of SR-1 was built) and there is no evidence of the former road, save for the potential alignment itself. It is recommended that during the removal of the Crossover Road, indications of the old "Sausalito Road" are considered and thus an archaeological monitor is present to inspect these activities, as warranted, for evidence of a buried former road surface, roadside features, and/or historic artifacts.~~

With implementation of Mitigation Measures CUL-~~2~~1 and CUL-~~3~~2, impacts to archaeological resources would be less than significant.

Pages 81, 150, and 151, Mitigation Measures CUL-2 through CUL-4:

Mitigation Measure CUL-~~2~~1: Archaeological Resources Monitoring

Prior to Project implementation, a Cultural Resources Monitoring Plan (Plan) will be prepared by a qualified archaeological consultant. The Plan will discuss the monitoring procedures, field methods, communication protocols, and inadvertent discovery actions to be taken in the event archaeological resources are identified during monitoring and/or any Project activities. ~~Periodic spot-check monitoring will occur during the removal/demolition of the Crossover Road and f~~Full-time monitoring will occur during vegetation removal at the location of the Oyster House. All monitoring will be carried out by a qualified archaeologist.

Mitigation Measure CUL-~~3~~2: Archaeological Resources Work Stoppage

Construction crews shall be trained in "basic archaeological identification" and have access to a Cultural Resources Awareness Sheet. The sheet shall photographically depict shell midden and associated indicators of archaeological sites, and clearly outline the procedures in the event of a new archaeological discovery. These procedures include temporary work stoppage (Stop-Work Order) of all ground disturbance, short-term physical protection of artifacts and their context, and immediate advisement of the archaeological team and MCOSD representatives. Any Stop-Work Order would contain a description of the work to be stopped, special instructions or requests for the Contractor, suggestions for efficient mitigation, and a time estimate for the work stoppage. The archaeologist shall examine the findings and assess their significance and offer recommendations for any procedures deemed appropriate to further investigate and/or mitigate adverse impacts to archaeological resources that have been encountered.

Mitigation Measure CUL-~~4~~3: Discovery of Human Remains

Upon discovery, the Coroner Division of the Marin County Sheriff's Office will be contacted for identification of human remains. The coroner has 2 working days to examine the remains after being notified. If the remains are Native American, the Coroner must notify the Native American Heritage Commission (NAHC) of the discovery within 24 hours. The NAHC will then identify and contact a Most-Likely Descendant (MLD). The MLD may make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the remains and grave goods. Once proper consultation has occurred, a procedure that may include the preservation, excavation, analysis, and curation of artifacts and/or reburial of those remains and associated artifacts will be formulated and implemented.

If the remains are not Native American, the Coroner will consult with the archaeological research team and the lead agency to develop a procedure for the proper study, documentation, and ultimate disposition of the remains. If a determination can be made as to the likely identity—either as an individual or as a member of a group—of the remains, an attempt should be made to identify and contact any living descendants or representatives of the descendant community. As interested parties, these descendants may make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the remains and grave goods. Final disposition of any human remains or associated funerary objects will be determined in consultation between the MCOSD and FIGR.

Page 151, paragraph under Checklist Question (c):

Section 7050.5 of the California Health and Safety Code states that it is a misdemeanor to knowingly disturb a human burial and Section 5097.99 of the Public Resources Code defines the obtaining or possession of Native American remains or grave goods to be a felony. Buried human remains, by law, must be reported to the County Coroner. The disposition of Native American burials is within the jurisdiction of the Native American Heritage Commission (NAHC), who has the statutory authority to mediate agreements regarding the disposition of Native American remains. In cases in which human remains are known or believed to be likely, consultation with the NAHC is initiated early in the planning process so that consultations with the appropriate Native American most-likely descendant occurs, and agreement regarding the disposition of the remains can be reached. Additionally, MCOSD would directly contact the Federated Indians of Graton Rancheria (FIGR) if human remains are inadvertently discovered. Although the discovery of human remains at the Project site is not expected to occur, Mitigation Measure CUL-~~4~~3 prescribes a procedure for addressing them should any be encountered. With implementation of Mitigation Measure CUL-~~4~~3, impacts to cultural resources would be less than significant.

In addition, the CLR, as well as the IS/MND, have been revised to include recognition of the preservation efforts of Dr. Marty Griffin and his colleagues at Audubon Canyon Ranch. The revised CLR records Dr. Griffin's and the Audubon Canyon Ranch's successful efforts to preserve Kent Island from marina development and to purchase multiple parcels along Tomales Bay to prevent large scale development.

Consistent with this, the IS/MND (at page 145, second paragraph under "Tourism and Land Use") has been revised as follows:

In the decades following World War II, much of the land in Marin County remained undeveloped. The completion of the Golden Gate Bridge allowed the San Francisco metropolitan area's growth to spread to eastern Marin County and towards the county's agricultural lands. Rural West Marin County increasingly became a contested space, with those who saw the coastal hamlets, pasturelands, and recovering forests as a landscape for recreation and relaxation pitted against developers and their bankers who saw it as prime for tract homes, tourist motels, and shopping malls. The Marin Conservation League had succeeded in preserving part of the Tomales Bay shore (with the assistance of Dr. Marty Griffin and his colleagues at Audubon Canyon Ranch, who helped preserve Kent Island from marina development and purchase multiple parcels along Tomales Bay to prevent large-scale development), but most of the bay, Point Reyes, Olema Valley, and the Bolinas Lagoon regions remained unprotected and open to development. In 1959, a diverse group of Bay Area citizens and supporting organizations ranging from the Marin Labor Council, the American Forestry Association, and the Wilderness Society, joined forces as the Point Reyes National Seashore Foundation and pushed for passage of supporting legislation to set land aside and to prevent development around the seashore (Blackmore, 2019).

Master Response 10: Noise

Master Comment Summary: Recommended corrections on noise thresholds within the IS/MND Noise section. Recommendation to locate staging and storage areas away from sensitive receptors, prevent idling of equipment, and utilize mufflers for internal combustion engines.

Caltrans staff provide the following recommendations:

- Noise: (IS/MND page 181) Table numbers referenced in the paragraph are incorrect. Caltrans staff recommend changing Table 25 to Table 29 & Table 26 to Table 30.
- Noise and Vibration Guidance: (IS/MND page 186) In the second full paragraph, Caltrans recommends a threshold of 0.5 in/sec to prevent potential damage to older residential structures. Change 0.5 in/sec to 0.3 in/sec (for continuous/frequent intermittent).
- Table 33: (IS/MND page 188) – In the column headed "Vibration Threshold in/sec" Caltrans recommends changing 0.5 in/sec to 0.3 in/sec.

Caltrans also recommends that staging and storage areas be located away from sensitive receptors, equipment idling be prevented, and that mufflers be utilized for internal combustion engines.

Comment expresses concern about the noise of the construction and requests information on noise mitigation measures during construction.

Response

The table numbers on page 181 of the IS/MND (last paragraph) have been corrected as follows:

> Noise is defined as unwanted sound that annoys or disturbs people and can have an adverse psychological or physiological effect on human health. Sound is produced by the vibration of sound pressure waves in the air. Sound pressure levels are used to measure the intensity of the sound and are described in terms of decibels. The decibel (dB) is based on a logarithmic scale and express the ratio of the sound pressure level being measured to a standard reference level. The starting point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Decibels and other acoustical terms are defined in Table ~~25~~29. The human ear is only capable of hearing sound within a limited frequency range. To better characterize noise levels perceived by a human ear, a decibel scale called A-weighting (dBA) is typically used. On this scale, the low and high frequencies are given less weight than the middle frequencies. Typical A-weighted noise levels at specific distances are shown for different noise sources in Table ~~26~~30.

The vibration threshold has been added to page 186 of the IS/MND (following Table 32) as follows:

> The California Department of Transportation (Caltrans) has developed vibration thresholds based on PPV values to evaluate the potential impact of construction vibration on structures. Construction vibrations that are equal to or exceed the vibration thresholds could result in potential damage to structures. For frequent intermittent vibratory sources during construction (e.g., vibratory compaction equipment), Caltrans recommends a threshold of 0.3 in/sec to prevent potential damage to older residential structures.

The vibration threshold in Table 33 on page 186 of the IS/MND has been revised as follows:

Table 2. Potential Vibration Damage to Older Residential Buildings during Construction

Equipment	Vibration Threshold	Buffer Distance to Threshold	Distance to Closest Receptor	Threshold Exceeded?
Unit	**in/sec**	**feet**	**feet**	
Vibratory roller	~~0.5~~ 0.3	~~14~~ 20	300	No
Large bulldozer		~~8~~ 11		No
Loaded truck		~~7~~ 10		No
Small bulldozer		1		No

Source: Vibration calculations are available upon request.

Mitigation Measure NOI-1, provided on page 185 of the IS/MND, addresses noise generated by proposed Project construction activities. Because proposed Project noise levels during construction are not expected to exceed applicable significant noise level impact thresholds at the nearest residence to the Project site, mitigation was only identified to address potential impacts to nesting birds in the vicinity, as follows:

> "If noise-inducing work occurs during the bird nesting season (February 1–July 31), preconstruction surveys for nesting birds shall be conducted. If nests are found, buffers would be established according to the species detected and state and federal regulations. Otherwise, if no nests are found, then noise-inducing activities would only take place between two hours after sunrise and two hours before sunset. If activities are particularly noisy, meaning louder than applicable county noise thresholds, sound barriers shall be erected around noise-inducing work sites to limit noise impacts to wildlife."

This measure would also have the effect of reducing noise levels audible to humans. Project construction work would be a temporary activity and, in addition to Mitigation Measure NOI-1, must comply with County ordinances addressing permissible hours of construction activity.

Master Response 11: Transportation: Traffic Safety

Master Comment Summary: The IS/MND does not adequately address traffic safety at the intersection of State Route 1 (SR-1) and Olema Bolinas Road. In particular, the IS/MND does not account for increasing traffic volumes at this intersection and fails to articulate the need for traffic calming measures or other improvements to intersection configuration that could improve safety.

Comment expresses concern about increased traffic safety risk from the project. Current ingress and egress for Bolinas along Olema Bolinas Road includes use of two intersections at the Bolinas Wye: 1) the intersection of Olema Bolinas Road and SR-1 generally used by traffic coming from Olema as well as points north and east, and 2) the intersection of the Fairfax Bolinas Crossover Road and SR-1 generally used by traffic coming from Stinson Beach as well as points south and east. These intersections are low angle (on the order of 45 degrees) and there are no traffic controls (i.e., flashing lights, turn lanes or stop signs). As a result, traffic tends to exit SR-1 quickly.

The commenter notes that the proposed Project entails 1) combining flows from the two current intersections with SR-1 into a single new intersection, 2) increasing the intersection angle to approximately 90 degrees and 3) includes no traffic controls. One of the proposed benefits of the intersection reconfiguration is reducing the speed of vehicles that are exiting SR-1 and entering Olema Bolinas Road (see IS/MND page 198, second paragraph - Section XVI. Q., Subsection CEQA Context, Item c). The comment states that this outcome would be desirable except that no traffic controls are proposed. As currently planned and during times when vehicles are following each other on SR-1, throughgoing traffic moving at speed would be impeded by vehicles slowing ahead of them to exit at the new intersection.

The commenter states that the safety implications of forcing exiting vehicles to slow down on this stretch of SR-1 without the benefits of traffic control include:

- Traffic travelling from the north
    - Pressure from behind as throughgoing vehicles gain speed
    - Unsafe passing by throughgoing vehicles on SR-1
    - Unsafe speeds by exiting vehicles
- Traffic travelling from the south
    - Pressure from behind as throughgoing vehicles gain speed
    - Unsafe passing by throughgoing vehicles on SR-1
    - Unsafe speeds by exiting vehicles
    - Cutting corner into oncoming Olema Bolinas Road traffic by exiting vehicles

The commenter states that the dangerous behaviors listed above already occur along this stretch of road and, without traffic control, the proposed road configuration changes (combining two intersections in to one and increasing the intersection angle) would make an already dangerous stretch of road even more dangerous, especially during heavy use periods such as summers and weekends.

Comment states that the IS/MND conclusion that no mitigation measures for traffic safety are warranted is based on a flawed analysis. Review of the Traffic Engineering Assessment and Intersection Control Evaluation reveals critical flaws. Supporting data for the Traffic Engineering Assessment are not representative of current conditions during periods that are critical to traffic safety. Traffic count data were collected in June of 2015 and December of 2021. The June 2015

data are outdated given the ever-increasing traffic load on local roads, and the December 2021 do not represent the high demand that generally occurs outside the winter season.

The commenter goes on to state that the collision history analysis is logically inconsistent because it compares collision history data for the area to Caltrans' quantitative thresholds used to justify implementation of traffic controls. This approach does not make sense for the Project because it uses accident history data for the current intersection configuration (two low-angle intersections) to evaluate the need for safety enhancements under a radically different intersection configuration (a single combined high-angle intersection).

The comment additional asserts that the line-of-sight analysis, which essentially evaluates the maximum speed at which a stop may be achieved for a given sight distance, is not applicable because the dangerous condition created by the change in intersection configuration would occur when vehicles are following each other and the lead vehicle slows down to exit. The vehicles would be separated by far less than the line-of-sight distance and the analysis is meaningless.

Comment states that the Bolinas community and visitors to the coast must have traffic controls at the proposed reconfigured intersection to create conditions that are safer than those currently proposed for the Project. Commenter acknowledges that there may be complications integrating traffic control with the overall Project details but that this is no excuse for inadequately providing for public safety.

Comment suggests that the County should engage with Caltrans to add traffic controls for the intersection to be reconfigured by the Project and advises that perspectives regarding the best traffic control approach might be gained by considering examples of traffic control at other intersections along SR-1 in nearby West Marin towns. In Stinson Beach, there are two controlled intersections – one four-way stop and one left turn lane. In Olema, there is one controlled intersection – a three-way stop.

Comment notes that, at a recent public meeting, community members offered a number of ideas about how to reduce the potential for accidents at the new single intersection, including: the installation a left-turn "pocket" lane on SR-1 for north-bound traffic; the installation of flashing lights at the intersection to alert drivers arriving from either direction to the upcoming intersection; and, the installation of a four-way stop or roundabout at the intersection to sufficiently slow traffic and reduce the potential for accidents.

The Bolinas Public Utility Commission Board of Directors urges MCOSD to convey the community's comments to CalTrans and to work with CalTrans in a collaborative fashion to incorporate as many of the suggested safety features as possible for the final design of the new intersection at SR-1 and Olema Bolinas Road.

Bolinas Fire Protection District Chief comments that the proposed road reconfiguration would improve safety for the Bolinas community and the many visitors travelling SR-1 en route to local attractions. The comment states that the proposed reconfiguration would offer better sight lines, more shoulder room, and less confusion for drivers navigating SR-1. With proper signage, this new configuration would be much safer than the present intersections. In addition, the elevated causeway would reduce hazardous road conditions due to flooding along Olema Bolinas Road, which has been a recurring problem in recent winters.

Comment suggests that including a roundabout at the SR-1/Olema Bolinas Road intersection would prevent risky cross traffic turns and keep traffic moving in a safer way. At the very least, a left turn lane should be available.

Comment expresses concern about losing the Wye and having it lead to traffic back-ups on busy days, and that it would cause more traffic congestion where it currently doesn't exist.

Comment expresses concern over the design of the causeway which looks very much like the highway over Richardson Bay - very inappropriate for this rural, environmental protective community.

Comment expresses concern that, according to Marin County's projection of sea-level rise in the not-distant future, all of SR-1 on the east side of the lagoon is going to be flooded, so the effort and expense to build that huge causeway would be a futile expense.

Support expressed by Marin Audubon Society for the project's modifications to roads, through and adjacent to the Project site, that would result in reduced road infrastructure and that would allow for the restoration of historic tidal wetland resources. The IS/MND reports that Caltrans, the Transportation Authority of Marin, and the DPW have been consulted throughout the process, that input from those agencies has been incorporated into the roadway designs, and that the design meets Caltrans standards for safety. Comment goes on to state that modification of the current roadway footprint by removing a segment of Fairfax Bolinas Road and elevating Olema Bolinas Road, is an essential component of the Project necessary to restore Lewis Gulch Creek to a more natural alignment, restore natural flows, and allow for the expansion of wetlands. Comment states that any change in the roadway design that would reduce the acreage of wetlands restored or otherwise reduce the ecological functions of the Project is not justifiable as part of this critical ecosystem restoration project and should be rejected.

Suggestion provided for installing traffic calming measures resulting in slower traffic that would reduce potential impacts to wildlife.

Response

The comments raise concerns over traffic safety at the redesigned, realigned intersection of SR-1 and Olema Bolinas Road. As is presented in the IS/MND (see Table 1), one of the Project goals is to improve road safety. One of the Project's objectives is to realign roads and the SR-1/Olema Bolinas Road intersection to improve safety. The IS/MND, in Section XVI.Q, Transportation, evaluated the impact of the proposed Project with respect to safety concerns. Specifically (at page 198):

> "Among the goals of the Project is to reduce flooding on County roads and improve traffic safety. Several components of the Project would reduce roadway flooding—Olema Bolinas Road would be raised and realigned to reduce roadway flooding during winter storm and high tide events; Lewis Gulch Creek, which crosses under the road, would be rerouted; and the bridge over the creek would be replaced to better withstand high water events. The flooding on Fairfax Bolinas Road would be eliminated by the road closure. These Project features would support the maintenance of safer access to and from Bolinas.
>
> The Project would also modify the geometrics of the intersection of SR-1 (Shoreline Highway)/Olema Bolinas Road. As currently configured, the intersection is skewed, which could result in limited visibility and difficulty turning left for northbound drivers in large vehicles. With the modification, the two roadways would intersect at approximately a right angle, enabling drivers turning left onto SR-1 to see traffic approaching from the right more easily. The proposed modification would also require southbound drivers traveling toward Bolinas to reduce their speed to turn right onto Olema Bolinas Road,

whereas currently they can proceed with a slight turn. This is expected to reduce vehicle speeds as drivers transition from SR-1 to enter Bolinas.

Once constructed, the proposed closure of the segment of Fairfax Bolinas Road and relocation of the SR-1/Olema Bolinas Road intersection would not result in an increase to hazardous conditions due to design features. No new roadway uses would be introduced as a result of the Project. Operational impacts would be less than significant. The proposed Project would not result in a substantial increase in hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)."

CEQA requires analysis and mitigation of impacts on a project's future users if a factual determination establishes that the proposed project risks exacerbating existing environmental conditions. Here, as discussed in the IS/MND (at page 198), implementation of the proposed Project would *improve* traffic safety relative to existing conditions. Traffic studies have not corroborated the comments suggesting that the existing intersections suffer from hazards, nor would the Project exacerbate any hazards. In fact, the studies indicate the Project is likely to reduce the traffic risks by improving sight lines, reducing flood risks to the road, and eliminating two non-standard roadway intersections by bringing them into conformity with Caltrans Highway Design Manual Standards.

The MCOSD supports the goal of improving public safety to the maximum extent feasible. Some of the improvements suggested in the comments would necessitate reducing the ability of the proposed Project to achieve its other stated objectives. For example, installing a roundabout or left-turn lane at the SR-1/Olema Bolinas Road intersection would require widening SR-1. This, in turn, would result in additional impacts to wetlands which would run counter to the goal of enhancing freshwater wetland communities. Additionally, the proposed Project is a MCOSD project that would be overwhelmingly implemented on County-owned land. SR-1 is owned and managed by Caltrans, a department of the State of California. Reconfiguration of SR-1 to further improve or maximize the safety of the traveling public is beyond the scope of the proposed Project and the County's jurisdiction, would require significantly greater involvement and support on the part of Caltrans.

The County is not informed of any future Caltrans projects that may address safety concerns expressed in the comments summarized above. Notably, no aspect of the proposed Project would prevent future improvements to SR-1 or the SR-1/Olema Bolinas Road intersection. The County would support and collaborate with Caltrans and the local community to secure funding and approvals for future modifications to these roadways with the aim of achieving optimal traffic safety outcomes.

With respect to some of the technical concerns raised about the analysis in the draft IS/MND, Project traffic studies, collision analysis, and sight distance evaluation were completed consistent with Caltrans' Left Turn Warrant Methodology and have been subject to Caltrans' review. These studies are summarized in Section XVI.Q, Transportation, of the IS/MND. Based on the warrant criteria and the available traffic and collision data at the time of the analysis, a left-turn lane was not warranted.

As is also discussed in the IS/MND (at page 193), a Caltrans Intersection Control Evaluation (ICE) was performed for the proposed Project and was submitted for Caltrans review in late 2022. ICE evaluations are performed whenever changes to access on a Caltrans-owned roadway are proposed. The ICE evaluation includes analyzing traffic count data, considering roadway geometry, and right of way impacts. Specific to this intersection, the following types of control

were considered as part of the ICE: all way stop control, roundabout, traffic signal, and side-street stop control. Based on the ICE findings, it was concluded that the proposed side-street stop-control was most appropriate for this location. An all-way stop control was deemed inappropriate given the infrequency and spacing of intersections in the area. A roundabout was deemed inappropriate due to the space required and associated environmental impacts that would limit the Project's ability to attain some of its restoration goals and objectives. The intersection did not meet traffic signal warrants. As a result, the minor street stop-controlled configuration was deemed most appropriate for inclusion in the Project design.

Caltrans reviewed and provided comments on the draft IS/MND but did not dispute any of the traffic, collision, or sight distance impact analyses or the methodologies utilized. In addition, Caltrans has participated on the Project's Technical Advisory Committee that has reviewed Project design and planning documents at the 35 percent and 65 percent design benchmarks. Because the proposed Project would not create a significant adverse impact on traffic safety but would instead improve safety over existing conditions, and because the proposed Project would be consistent with existing applicable highway design standards as evaluated by Caltrans, additional traffic safety improvement measures in the design or implementation or the proposed Project are not required.

Master Response 12: Transportation: Mitigation

Master Comment Summary: Recommends additional analysis of night-time construction and specifies the overhead safety lighting standard.

Caltrans staff recommends adding evaluation of nightwork, as it is possible that temporary and/or permanent paving or striping on SR-1 might need to occur at night, depending on approved lane closure charts.

If long term one-way traffic control is needed on SR-1, any overhead safety lighting must have fixture limited to 2500 K or less to reduce impact of anthropogenic lighting.

Response

No nightwork is being proposed during Project construction activity.

It is anticipated that single lane traffic control on SR-1 would be temporary for only the paving and striping activities. The paving and striping work on SR-1 would be relatively minor and should be accomplished in just a few days. No longer term lane closures are anticipated.

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ATTACHMENT 1: COMMENTS RECEIVED ON THE IS/MND

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August 8, 2023

Comment Letter 1

Ms. Veronica Pearson

Sr. Ecological Restoration Planner
County of Marin/ Marin County Parks
3501 Civic Center Drive, Room 260
San Rafael, CA 94903

Subject: Marin State Route 1 - BOLINAS LAGOON WYE WETLANDS RESILIENCY PROJECT: Initial Study with Mitigated Negative Declaration

Dear Ms. Pearson:

The California Department of Transportation (Caltrans) received a Notice of Intent (NOI) for the Initial Study/ Mitigated Negative Declaration (IS/MND) from the Marin County Open Space District (MCOSD) for Bolinas Lagoon Wye Wetlands Resiliency Project under the California Environmental Quality Act (CEQA) and CEQA guidelines.

Thank you for the opportunity to provide comments on the Draft IS/MND for the above-referenced project. The Caltrans oversight team comments are limited to portions of the project within the State Right of Way, and/or that may impact the State Right of Way.

Please find attached comments from Caltrans staff the following sections of the Draft IS/MND: Air Quality, Biological Resources, Cultural Resources, Noise, and Hydrology/Water Quality.

Thank you for the opportunity to provide comments on the project. As expected, additional comments may be provided through the Caltrans Encroachment Permit process. If you have any questions on our comments, please contact Ms. Arnica McCarthy, Senior Environmental Planner for clarifications or further coordination.

Sincerely,

INHO (EDDIE) KIM, Ph.D., P.E.
Project Manager
California Department of Transportation
District 4/ Division of Program and Project Management

Attachment: Comments on the Draft IS/MND

c: Arnica McCarthy, Senior Environmental Planner, Office of Environmental Planning & Engineering

Attachment 1

Please see the following comments provided by Caltrans on the Public Draft Environmental Document:

Cultural Resources:

The Cultural Landscape Report (CLR) prepared in compliance with CEQA, Section 106 of the National Historic Preservation Act and NEPA for the Bolinas Lagoon Wye Wetland Project, evaluated three road segments (State Route 1 [SR-1], Olema Bolinas Road, and Crossover Road) within the project area. The CLR determined them eligible for the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register) and concludes that when combined with a portion of the already listed Wilkins Ranch (a contributing feature of the Olema Valley Dairy Ranches Historic District), it creates a National Register eligible Cultural Landscape. Caltrans, as the owner of Highway 1 was not consulted on the evaluation of its facility. Determining a State-owned facility a historic property eligible for the National Register would make it Public Resource Code (PRC) 5024 State-owned historical resource, additionally any treatment or mitigation measures developed for Highway1 should be completed in consultation with Caltrans pursuant to Section 106. MR-9

The IS/MND asserts that the segment of Highway 1 within the study area is eligible for the National Register and California Register because it was constructed during the period of significance (1856-1961) of the Olema Valley Dairy Ranches Historic District and has a shared historic context with the district (ISMND page 141). However, the period of significance for the Olema Valley Historic District is 1856-1958. Additionally, the segment of Highway1 was not constructed until the mid-1950s, and as such does not appear to contribute to the historical significant developments of agriculture, transportation and tourism. Furthermore, the *Olema Valley Dairy Ranches Historic District National Register Nomination* does not discuss or include any of the three roadway segments analyzed for this project. As such is it our assessment that the Highway 1 is not eligible for the National Register based on the information provided.

Hydraulics:

Section IV – Project Need, Purpose, and Objectives (Pg.17/223)

D. Project Outcomes

- In the second paragraph, the reference to the OPC's Table 1. Caltrans staff believe it should reference OPC's Table 13.
- Table 2 uses Sea Level Rise Predictions of 2.0' and 5.5', but OPC's Table 13 it appears these values should be 1.9' and 5.6'. MR-3
- The last sentence notes the project's benefit to Olema Bolinas Road. Similarly, Caltrans staff would recommend including a discussion of the project's impact to Highway 1 in the 100-year flow and various Sea Level Rise scenarios. Inclusion of a Figure (similar to Figure 18) that depicts flooding extent and depths for the existing condition (no improvements) with Sea Level Rise scenarios would be helpful.

Air & Noise:

Section VII – Construction

B. Equipment: (Pg. 30/223)

- Lists pile-driving equipment for construction activities, however, the plans show piles to be CIDH piles. If pile driving is not proposed, Caltrans staff recommends removing pile driving from the list of construction equipment.

MR-5

Section XIV – Proposed Mitigation Measures: (Pg. 78/223)

Caltrans staff recommends adding the following:

- Air Quality: Dust control, maintain construction equipment and vehicles, contractor air quality compliance etc.
- Greenhouse Gas Emissions: Regular vehicle and equipment maintenance; limit idling of vehicles and equipment onsite; recycle non-hazardous waste and excess material etc.

MR-7

- Noise: Staging and storage areas away from sensitive receptors, prevent idling of equipment, utilizing mufflers for internal combustion engines etc.

MR-10

Section XVI – CEQA Guidelines Appendix G Checklist Analysis

c) Construction Toxic Air Contaminant Emissions: (Pg.103/223)

Caltrans staff recommends using U.S. EPA's Industrial Source Complex Short Term (ISCST3) air dispersion model to calculate DPM and PM2.5 concentrations, which is no longer an approved model. Correct to use a valid model.

Table 11: Health Risks at MEIR During Project Construction: (Pg. 104/223)

Under the Foot note – Source: CalEEMod, which is incorrect. Caltrans staff recommends correcting the model name.

MR-7

M. Noise:

General Information on Noise: (Pg. 183/ 223)

Table numbers referenced in the paragraph are incorrect. Caltrans staff recommends changing Table 25 to Table 29 & Table 26 to Table 30.

Federal and State Guidance for Noise and Vibration: (Pg. 186/223)

In the second full paragraph: Caltrans recommends a threshold of 0.5 in/ sec to prevent potential damage to older residential structures. Change 0.5in/sec to 0.3 in/ sec (for continuous/ frequent intermittent).

MR-3

Table 33 – Potential Vibration Damage to Older Residential Buildings during Construction

Column: Threshold in/ sec: (Pg. 188/223)
Caltrans recommends changing 0.5 in/sec to 0.3 in/ sec.

MR-3

Biological Resources:

Section VI – Project Need, Purpose, and Objectives (Pg. 14/223)

A. Project need – First paragraph

Caltrans staff is not in full agreement with this statement:
"The surrounding roads, channels, and culverts (Lewis Gulch Creek at Highway 1, Wilkins Gulch Creek, Salt Creek; described further below) further constrain stream, wetland, and floodplain processes in the Bolinas Wye wetland. Under these conditions, sediment is being transported to and is accumulating in the roadside ditch and box culvert instead of the Bolinas Lagoon and wetland areas. Restoration of more natural hydrologic processes is needed for wetlands to continue to exist with future SLR encroaching against the current hardscapes within the Wye."

MR-2

While the roads may have some effect the degradation of the watershed due to logging/land use practices upstream/climate change is mostly responsible for the increase in sediment transport. The sediment is going to settle out in its "happy place" depending on flow velocities/particle size/ and topography. The undersized RBC at Lewis creek probably does not help but if the slope flattens out there it probably still will happen in that reach. Humans were just really good at building at these locations.
See the issues at PM 16.47 Winnebago Point for similar issues.

Figure 11. Log Structure and bank Stabilization (Pg.55/223)

The project proposes to use bioengineering (rootwads and willows) to protect Highway 1 at Lewis Gulch. Design figure for that shows the rootwads in the thalweg of the proposed channel. At low flows this might not be such an issue but at higher flows it may push the core flow energies to the right (looking downstream) that the inside of the meander could be eroded or the water may erode under the rootwads causing scour and thus defeating the intended purpose of the bioengineering. Caltrans staff is interested in seeing any additional information on the stability and engineering calculations for this design.

MR-4

Caltrans staff would like to better understand where the County expects the alluvial fan to occur in the new design and if there is concern the creek might find a new path. That lower floodplain is fairly flat, what would prevent the creek from migrating toward Highway 1 in the future and cause issues along the embankment?

Coast Live Oak for Rootwads (Pg. 22/223)

Marin County suggests using coast live oak for rootwads, in our professional experience, we have found coast live oak rootwads do not last as long as redwood.

Please provide the design calculations supporting the use of rootwads placed on other logs at the toe of slope of the Highway 1 embankment. MR-4

Caltrans staff recommends adding evaluation of nightwork, as it is possible that temporary and/or permanent paving or striping on Highway 1 might need to occur at night, depending on approved lane closure charts. MR-12

If long term one-way traffic control is needed on Highway 1, any overhead safety lighting must have fixture limited to 2500 K or less to reduce impact of anthropogenic lighting.

Caltrans staff recommends making Figures 4 and 6 “new wetlands” areas consistent along Highway 1. (Pg. 48, 50/223) MR-8

Submitted via Project Public Comment Web Portal

Comment Letter 2

August 3, 2023

Veronica Pearson
Project Manager, Senior Ecological Restoration Planner
Marin County Parks
3501 Civic Center Drive, Suite 260
San Rafael, Ca 94903

Response to CEQA Public Comment Period for: ***Draft Initial Study/Mitigated Negative Declaration for the proposed Bolinas Lagoon Wye Wetlands Resiliency Project***

Ms. Pearson,

Thank you for discussing the above-reference project document with me and making available the referenced materials that I requested. While I support the overall project goals, especially the hydrologic and ecological elements, I am concerned about increased traffic safety risk from the project. Moreover, verbal comments made in response to your project summary presentation during the July 19, 2023, Board of Directors meeting for the Bolinas Community Public Utility District indicate that the wider Bolinas community shares my concern. At that meeting, all five Directors (four attending in-person and one by video conference) as well as several community members expressed similar concerns. In every instance, the concern focused on traffic safety implications of the project for the intersection of Olema-Bolinas Road and State Route 1[1].

Traffic Safety Implications of the Project

Current ingress and egress for Bolinas along Olema-Bolinas Road includes use of two intersections at the Bolinas Wye: 1) the intersection of Olema-Bolinas Road and State Route 1 generally used by traffic coming from Olema as well as points north and east, and 2) the intersection of the Bolinas-Fairfax Crossover Road and State Route 1 generally used by traffic coming from Stinson Beach as well as points south and east. These intersections are low angle (on the order of 45 degrees) and there are no traffic controls (i.e., flashing lights, turn lanes or stop signs). As a result, traffic tends to exit State Route 1 quickly.

MR-11

Based on personal experience driving and bicycling these roads for more than 30 years, motorized vehicles tend to accelerate on this part of State Route 1. Drivers travelling from the north have just emerged from a winding and wooded section of the roadway. Drivers travelling from the south have just completed the winding portion of the road around the Bolinas Lagoon. In both cases, the drivers see open road ahead and very often gain speed.

[1] Another clear indication of community concern is the Nextdoor thread for Bolinas-Dogtown regarding a fatal collision that occurred on or about April 1, 2023. In that forum, 22 different community members express great concern about current traffic safety conditions at the intersections considered for this project. It is reasonable to conclude that these community members are also concerned about the potential for increased risk in the same area posed by the project.

The proposed project entails 1) combining flows from the two current intersections with State Route 1 into a single new intersection, 2) increasing the intersection angle to approximately 90 degrees and 3) including no traffic controls. One of the proposed benefits of the intersection reconfiguration is reducing the speed of vehicles that are exiting State Route 1 and entering Olema-Bolinas Road (see Initial Study page 198, second paragraph - Section XVI. Q., Subsection CEQA Context, Item c). This project outcome would be desirable except that no traffic controls are proposed. As currently planned and during times when vehicles are following each other on State Route 1 (a very common occurrence), throughgoing traffic moving at speed would be impeded by vehicles slowing ahead of them to exit at the new intersection.

The safety implications of forcing exiting vehicles to slow down on this stretch of State Route 1 without the benefits of traffic control include those outlined below.

Safety Implications of Intersection Reconfiguration without Traffic Controls

- Traffic travelling from the north
  - Pressure from behind as throughgoing vehicles gain speed
  - Unsafe passing by throughgoing vehicles on State Route 1
  - Unsafe speeds by exiting vehicles
- Traffic travelling from the south
  - Pressure from behind as throughgoing vehicles gain speed
  - Unsafe passing by throughgoing vehicles on State Route 1
  - Unsafe speeds by exiting vehicles
  - Rushed lefthand turns across oncoming State Route 1 traffic by exiting vehicles
  - Cutting corner into oncoming Olema-Bolinas Road traffic by exiting vehicles

MR-11

The dangerous behaviors listed above already occur along this stretch of road and, without traffic control, the proposed road configuration changes (combining two intersections in to one and increasing the intersection angle) would make an already dangerous stretch of road even more dangerous. Local drivers may become accustomed to the changes after some time; however, visitors to the area would be subject to the more difficult driving conditions without warning and create dangers for both local and visiting drivers. This would be especially true during heavy use periods, generally summers and weekends, and increase as visitation to the coast trends upward over time.

Flawed Basis for Conclusion that No Traffic Controls are Warranted

The Initial Study determines that no mitigating measures for traffic safety are warranted based on analysis that includes consideration of potential for congestion and accidents. In addition to the Initial Study, details of the analysis are contained in two referenced technical memoranda: 1) Traffic Engineering Assessment and 2) Intersection Control Evaluation. Review of the documents reveals three critical flaws.

First, supporting data for the Traffic Engineering Assessment are not representative of current conditions during periods that are critical to traffic safety. Traffic count data were collected in June of 2015 and December of 2021. The June 2015 data are outdated given the ever-increasing traffic load on our local

roads[2], and the December 2021 do not represent the high demand that generally occurs outside the winter season. Moreover, the data collection efforts for weekends miss the early morning period of heavy use by groups of motorcycles, vehicles transporting surfers, and bicyclists riding the roads. As a result, the data do not include many of the visitors to the coast that would be unaware of the increased demands of negotiating the new intersection configuration.

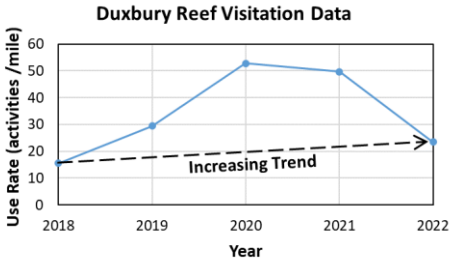
Second, the collision history analysis is logically inconsistent. The analysis entails comparing collisions history data[3] for the area to Caltrans quantitative thresholds used to justify implementation of traffic controls. This approach does not make sense for the project under consideration because it uses accident history data for the current intersection configuration (two low-angle intersections) to evaluate the need for safety enhancements under a radically different intersection configuration (single combined high-angle intersection). As a result, this analysis fails to consider the increased traffic risks outlined in the previous section of this letter.

Third, the line-of-sight analysis, which essentially evaluates the maximum speed at which a stop may be achieved for a given sight distance, is not applicable. As stated above, the dangerous condition created by the change in intersection configuration would occur when vehicles are following each other (extremely common occurrence) and the lead vehicle slows down to exit. The vehicles will be separated by far less than the line-of-sight distance and the analysis becomes meaningless. Additionally, the speeds supported by the analysis and discussed in the text of the Initial Study (e.g., page 198, third and fourth paragraphs - Section XVI. Q., Subsection CEQA Context, Item c) are too low to represent the high speeds that lead to accidents on this roadway.

MR-11

Overall, deficiencies in the data and assumptions used for the analysis result in the incorrect conclusion that traffic controls are not warranted. The Negative Declaration is also incorrect since it relies upon a flawed analysis.

[2] While analysis based on the 2015 data did include a one-percent annual growth rate for traffic, experience indicates that the rate of growth is far greater. As an independent and quantitative indication of what community members understand through experience, consider the visitation data for the Agate Beach part of the Duxbury Reef Marine Conservation Area located in Bolinas. Data collected and tabulated by Marine Protection Area Watch (https://mpawatch.org/reports/) demonstrate a general increasing trend with time as well as increased use patterns related to the COVID period (see plot below). Using the year 2018 as a baseline and considering only years outside of the peak COVID period, the data indicate a 90-percent annual growth rate for 2019 and a 13-percent annual growth rate for 2022.



[3] Please note that the accident data used for the analysis does not include the fatal collision that occurred on or about April 1, 2023.

Project Modifications to Address Traffic Safety

The Bolinas community and visitors to the coast must have traffic controls at the proposed reconfigured intersection to create conditions that are safer than those currently proposed for the project. There may be complications integrating traffic control with the overall project details; however, project planning difficulties are no excuse for inadequately providing for public safety. It appears that impediments to project improvements regarding traffic safety may include: 1) differences in County and Caltrans roadway jurisdictions that result in a poorly-integrated approach for addressing traffic safety implications of the project, 2) restrictions on use of allocated funds for traffic control that constrain project options and 3) possible funding expiration dates that decrease the ability to spend the time required to integrate County plans with Caltrans operations. These and other limitations should be surmounted by combining the efforts of County and State officials that represent West Marin to apply pressure where it is needed to achieve the critical public benefit of traffic safety.

The County should engage with Caltrans to add traffic controls for the intersection to be reconfigured by the project. Perspectives regarding the best traffic control approach might be gained by considering examples of traffic control at other intersections along State Route 1 in nearby West Marin towns. In Stinson Beach, there are two controlled intersections – one four-way stop and one left turn lane. In Olema, there is one controlled intersection – a three-way stop. Furthermore, the planning should favor protecting drivers who are risk-averse, less capable and less confident. This approach would benefit all community members, as well as visitors to the coast, and may especially benefit new/learning and older drivers.

MR-11

Finally, inspiration for addressing this necessary project improvement can be found in elements of the planning efforts already performed for this project. In response to verbal comments on your earlier project summary presentation during the December 16, 2020, Board of Directors meeting for the Bolinas Community Public Utility District, creative thinking was applied to address requested improvement for bicycle safety (see Initial Study page 39 - third bullet of Section X. D.). I truly appreciate that effort, as well as the resulting project improvement, and look forward to the additional project improvement requested in this letter.

Respectfully submitted,

Robert M. Gailey
rob@rmgailey.com

cc via email:
Bolinas Community Public Utility District General Manager Jennifer Blackman (jblackman@bcpud.org)
Marin County Supervisor Dennis Rodoni (bos@marincounty.org)
Marin County Department of Public Works Director Rosemarie Gaglione (rgaglione@marincounty.org)
California State Assembly Member Damon Connoly (assemblymember.connolly@assembly.ca.gov)
California State Senate Member Mike McGuire (senator.mcguire@senate.ca.gov)

BOLINAS COMMUNITY PUBLIC UTILITY DISTRICT

BCPUD BOX 390 270 ELM ROAD BOLINAS CALIFORNIA 94924 415 868 1224

August 7, 2023

VIA E-MAIL: vpearson@marincounty.org

Comment Letter 3

Veronica C. Pearson
Senior Ecological Restoration Planner
Marin County Parks
Marin County Civic Center
3501 Civic Center Drive, Suite 260
San Rafael, California 94903

Re: Initial Study/Mitigated Negative Declaration for the Proposed Bolinas Lagoon Wye Wetlands Resiliency Project.

Dear Veronica:

On behalf of the Bolinas Community Public Utility District ("BCPUD"), I am writing to convey the comments expressed at the regular monthly meeting of the BCPUD Board of Directors on July 19, 2023 following your update on the Initial Study/Mitigated Negative Declaration for the Proposed Bolinas Lagoon Wye Wetlands Resiliency Project ("Wye Wetlands Resiliency Project"). Thank you again for taking the time to present a comprehensive and detailed update about the Initial Study and this important proposed restoration project so close to our town, and for engaging so thoroughly with our community members about their questions and concerns. We truly appreciate your outreach and the opportunity for stakeholder involvement.

The BCPUD Board of Directors and community members speaking at the July 19, 2023 meeting generally were very supportive of the comprehensive environmental and ecological restoration objectives of the proposed Wye Wetlands Resiliency Project. As you know, long-time Bolinas community members Ralph Camiccia and Rudi Ferris have been deeply involved with this project (and proposed predecessor projects) for many years as members of the Bolinas Lagoon Advisory Council and have provided invaluable input on behalf of our community. The BCPUD would like to thank Marin County Parks and its partner agencies for listening and responding to community input and concerns as work has progressed on various proposed projects at the Wye.

MR-11

That said, the public comments made during the July 19, 2023 BCPUD Board meeting made clear that the community is very concerned about the public safety implications for the newly-configured single intersection proposed as part of this project for Highway 1 and Olema-Bolinas Road once the cross-over road is eliminated. Community members speaking at the meeting said they believe the traffic study conducted by CalTrans was fundamentally flawed because it was conducted at a low-traffic time of year (December) and, most importantly, because it did not analyze the proposed new configuration of a single-intersection at Highway 1 and Olema-Bolinas Road (i.e., the study did not analyze the implications of changing the traffic flow from two separate "entry points" to Olema-Bolinas Road into only one entry point to Olema-Bolinas Road). Community members offered a number of ideas about how to reduce the potential for accidents at the new single intersection, including: the installation a left-turn "pocket" lane on Highway 1 for north-bound traffic; the installation of flashing lights at the intersection to alert drivers arriving from either direction to the upcoming intersection; and, the

installation of a four-way stop or roundabout at the intersection to sufficiently slow traffic and reduce the potential for accidents. In response to these concerns and suggestions, you noted that the CalTrans is responsible for Highway 1, not Marin County Parks or Public Works, and Caltrans would need to evaluate and approve the installation of any of these safety measures. Community members said CalTrans therefore should do so, and suggested that the Bolinas Fire Protection District may have historical data from their accident response records that could be helpful to CalTrans in this regard.

In light of these important public safety concerns about the proposed newly configured intersection at Highway 1 and Olema-Bolinas Road, the BCPUD Board of Directors urges Marin County Parks to convey the community's comments to CalTrans and to work with CalTrans in a collaborative fashion to incorporate as many of the suggested safety features as possible for the final design of the new intersection at Highway 1 and Olema-Bolinas Road.

MR-11

We appreciate this opportunity to comment on the proposed Wye Wetlands Resiliency Project. Please contact me if you have any questions about our comments or would like to discuss them with me. Thank you very much for your dedicated work on this important project.

Very truly yours,

Jennifer Blackman
General Manager

cc: Ralph Camiccia, Bolinas Lagoon Advisory Committee
Rudi Ferris, Bolinas Lagoon Advisory Committee
George Krakauer, Fire Chief, Bolinas Fire Protection District

BOLINAS FIRE PROTECTION DISTRICT

P.O. BOX 126 ■ 100 MESA ROAD ■ BOLINAS, CALIFORNIA 94924
415 868-1566 ■ FAX 415 868-2009

Veronica Pearson
Sr. Ecological Restoration Planner, Marin County Parks

Comment Letter 4

On behalf of the Bolinas Fire Protection District and its Board of Directors, I am writing to express support for the BOLINAS LAGOON WYE WETLANDS RESILIENCY PROJECT.

As Fire Chief, I believe the proposed road reconfiguration would improve safety for the Bolinas community and the many visitors travelling State Route 1 en route to local attractions.

As a first responder, I have encountered many vehicle accidents at both intersections of the Bolinas Wye, including several fatalities. The proposed reconfiguration would offer better sight lines, more shoulder room and less confusion for drivers navigating State Route 1. With proper signage, I believe this new configuration will be much safer than the present intersections.

MR-11

In addition, I believe the elevated causeway will reduce hazardous road conditions due to flooding along Olema-Bolinas Road, which has been a recurring problem in recent winters.

I thank you and the team at Marin County Parks for your attentive and detailed project proposal.

Sincerely,

G. Krakauer

George Krakauer
Bolinas Fire Chief

wra

Rob Carnachan <robert.carnachan@wra-ca.com>

Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - J Howard Dillon

1 message

J Howard Dillon <noreply@formresponse.com> Wed, Jul 26, 2023 at 7:09 PM
Reply-To: marinmax2278@gmail.com
To: rpassantino@marincounty.org, vpearson@marincounty.org, khyde@marincounty.org, robert.carnachan@wra-ca.com

Comment Letter 5

MARIN COUNTY
PARKS
PRESERVATION · RECREATION

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Name	J Howard Dillon
Email	marinmax2278@gmail.com
Zipcode	94924
Comments	To Whom It May Concern: There must be a totally safe turning from Highway One onto Olema-Bolinas Road. Apparently the number of traffic accident fatalities over the years is not high enough to trigger some California State safety procedure but even one death is too many. Please ensure that both directions on Highway One have more than adequate warning signs to maximize the possibilities of safe turning. A STOP sign with it's attendant warnings might be best. Thank You

MR-12

You can edit this submission and view all your submissions easily.

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wra

Rob Carnachan <robert.carnachan@wra-ca.com>

Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Jennie Pfeiffer

Jennie Pfeiffer <noreply@formresponse.com> Sat, Jul 29, 2023 at 1:18 AM
Reply-To: Jenniepfeifferr@gmail.com
To: rpassantino@marincounty.org, vpearson@marincounty.org, khyde@marincounty.org, robert.carnachan@wra-ca.com

Comment Letter 6

MARIN COUNTY
PARKS
PRESERVATION · RECREATION

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Name	Jennie Pfeiffer
Email	Jenniepfeifferr@gmail.com
Zipcode	94924
Comments	It's an exciting project that will have a huge environmental impact on Bolinas Lagoon, eliminating flooding on the northernmost end of the Lagoon as it also provides improvements in fish and wildlife habitat. My only concern is the traffic impact of the turnoff to Bolinas. Having only one intersection for both north and southbound traffic turning onto Olema-Bolinas Road and Bolinas-Fairfax Road will make a dangerously congested area on highway one. There have been accidents there in the past, with serious injuries and at least one fatality. A round-about there would prevent risky cross traffic turns and keep traffic moving in a safer way. At the very least, a left turn lane should be available. Many thanks for this excellent project.

MR-11

MR-12

You can edit this submission and view all your submissions easily.

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Rob Carnachan <robert.carnachan@wra-ca.com>

RE: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Matt Lewis

Pearson, Veronica <vpearson@marincounty.org> Tue, Jul 11, 2023 at 5:39 PM
To: "Passantino, Rosemary" <RPassantino@marincounty.org>
Cc: Rob Carnachan <robert.carnachan@wra-ca.com>

Hi Rosemary, did you add Rob LaPorte to receive these emails? It should be Rob Carnachan. Thanks, Veronica

From: Matt Lewis <noreply@formresponse.com>
Sent: Tuesday, July 11, 2023 4:12 PM
To: Passantino, Rosemary <RPassantino@marincounty.org>; Pearson, Veronica <vpearson@marincounty.org>; Rob LaPorte <rlaporte@parksconservancy.org>; Hyde, Kelly <khyde@marincounty.org>
Subject: Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Matt Lewis

Comment Letter 7

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Name	Matt Lewis
Email	mlewisconstruction@icloud.com
Zipcode	94924
Comments	I appreciate the benefits of re-establishing the wetlands and ecosystem at the north end of the Bolinas Lagoon. However, I hate the idea of losing the Wye. I believe that it is going to lead to traffic back-ups on busy days, and that it will cause more traffic congestion where it currently doesn't exist. I also do not believe that it is going to slow down those driving on Olema-Bolinas Road. It certainly

MR-11

isn't going to look any better.
Not looking forward to the traffic issues that this project is going to cause during construction.
Does the positives truly out weigh the negatives? We will see.

MR-11

You can edit this submission and view all your submissions easily.

Rob Carnachan

From: No-Reply <No-Reply@marincounty.org>
Sent: Wednesday, July 12, 2023 10:56 PM
To: Pearson, Veronica
Subject: Traffic change on Highway into Bolinas

Comment Letter 8

Sherry HIrsch with email address sherry.hirsch1@gmail.com would like information about:
I heard you describe the Wye project at the Civic Group tonight and have listened in on lagoon meetings about the project in the past. I live part time on Wharf Road since 1986 across from the lagoon. My concern is about the deadly traffic accidents mostly involving motorcycles passing vehicles turning into the Wye. At a previous meeting about this someone mentioned adding a left turn lane on the northbound lane. What measures are being considered to make this entry into town safer, other than a longer sight line? If that is even possible given the curve of the road at the north entrance. Thanks for a great project.

MR-11

wra

Rob Carnachan <robert.carnachan@wra-ca.c MR-11

Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Elia Haworth

1 message

Elia Haworth <noreply@formresponse.com> Mon, Aug 7, 2023 at 8:43 PM
Reply-To: eahaworth@earthlink.net
To: rpassantino@marincounty.org, vpearson@marincounty.org, khyde@marincounty.org, robert.carnachan@wra-ca.com

Comment Letter 9

MARIN COUNTY
PARKS
PRESERVATION · RECREATION

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Name	Elia Haworth
Email	eahaworth@earthlink.net
Zipcode	94924
Comments	Hello, I know this plan has been carefully vetted. I have two concerns, one is the design of the causeway which looks very much like the highway over Richardson Bay-- very inappropriate for our rural, environmental protective communities. MR-11 My 2nd concern is that according to Marin County's projection of sea level rise in the not-distant future, all of HWY 1 on the east side of the lagoon is going to be flooded, so the effort and expense to build that huge causeway will be a futile expense. MR-3 Thank you

You can edit this submission and view all your submissions easily.

1
0K

wra

Rob Carnachan <robert.carnachan@wra-ca.com>

FW: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Lewis Samuels

1 message

Pearson, Veronica <vpearson@marincounty.org> Thu, Jul 13, 2023 at 11:11 AM
To: Rob Carnachan <robert.carnachan@wra-ca.com>

From: Lewis Samuels <noreply@formresponse.com>
Sent: Thursday, July 13, 2023 9:53 AM
To: Passantino, Rosemary <RPassantino@marincounty.org>; Pearson, Veronica <vpearson@marincounty.org>; Rob LaPorte <rlaporte@parksconservancy.org>; Hyde, Kelly <khyde@marincounty.org>
Subject: Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Lewis Samuels

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Comment Letter 10

Name	Lewis Samuels
Email	lewissamuels@gmail.com
Zipcode	94924
Comments	One consideration missing from the thorough Bolinas Lagoon Wye Wetlands Resiliency Project: During the construction phases, many vehicles into and out of Bolinas will likely choose to divert onto Horseshoe Hill Rd. in order to avoid construction traffic and delays. Horseshoe Hill Rd is a significant wildlife corridor with poor visibility and multiple bus stops for Bolinas Stinson

MR-12

School, which narrows to less than two lanes at the north end. The environmental impact on this wildlife corridor is already being felt via frequent roadkill as drivers speed on Horseshoe Hill Road. What steps are being taken to protect local wildlife and pedestrians as vehicular traffic will inevitably increase on Horseshoe Hill Road during construction? I would recommend that the county consider speed bumps, local traffic only signs, or other measures to prevent negative environmental impacts on local wildlife along Horseshoe Hill Rd. Thank you for your thoughtful consideration!

MR-12

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Marin Audubon Society

P.O. Box 599 | Mill Valley, CA 94942-0599 | marinaudubon.org

August 4, 2023

Comment Letter 11

Veronica Pearson, Sr Ecological Restoration Planner
Matin County Department of Public Works
vpearson@marincounty.org

RE: Comments on Bolinas Lagoon Wye Wetlands Resiliency Project

Dear Ms Pearson:

The Marin Audubon Society appreciates the opportunity to comment on the Initial Study/Negative Declaration (IS) for the Bolinas Wye Wetland Resiliency Project. The proposed Project would restore parcels at the north end of Bolinas Lagoon that are owned by Marin County and the Open Space District. We support this Project because of the many ecological benefits it will provide, including reestablishing hydrological and ecological processes, improving upland and aquatic habitats providing connectivity for fish and the wildlife, increasing wetlands and resilience of the aquatic ecosystem to sea level rise. The Project is an essential step in reversing the damage to Bolinas Lagoon habitat resources that has taken place over many years. Involving a Technical Advisory Committee of representatives of numerous agencies, the Golden Gate National Park's Conservancy, and other experts providing technical and scientific guidance and participating in developing the Project design, has undoubtedly resulted in a more hydrologically and biologically sound project. We have a few specific comments:

1. The proposed Project is a part of a larger area that would need to be restored in order to fully restore the Bolinas Lagoon ecosystem. It would be useful for the IS to address whether there are efforts underway for the National Park Service, the agency that owns the adjacent property, to build upon this Project and expand restoration of the lagoon habitat on its property. MR-6

2. In order to implement the Project 123 trees would be removed. The IS reports that 1,246 trees would be planted as mitigation for the loss of the removed trees. While this is a substantial increase in the number of trees that we applaud, the IS should provide more information to enable more complete evaluation of the mitigation. The species of trees planted should be listed. They should be of the same native species that will be removed. MR-8

   Mitigation Measure BIO-IS provides that "onsite planting may occur within the restored floodplain where the cross over section of Fairfax Bolinas Road is removed...." The use of "may" conveys uncertainty and is a concern. To the extent possible, the mitigation trees should be installed within the project site so that they benefit Bolinas Lagoon natural

resources. The IS should define the number, or at least an estimate, of the number of mitigation trees that could be accommodated in the section of Fairfax Bolinas Road that would be removed. If they cannot all be accommodated there, the location(s) where they would be planted should be identified. If some must be accommodated in another places, those locations should ensure clear benefits Bolinas Lagoon resources.

3. There will be modifications to roads, through and adjacent to the project site, that will result in reduced road infrastructure and that will allow for the restoration of historic tidal wetland resources. The IS reports that Caltrans, the Transportation Authority of Marin and the Marin County Department of Public Works have been consulted throughout the process, that input for those agencies has been incorporated into the roadway designs and that the design meets Caltrans standards for safety. Modification in the current roadway footprint by removing a segment of Bolinas-Fairfax Road and elevating Olema Bolinas Road, are essential components of the Project, essential to restore Lewis Gulch Creek to a more natural alignment, restore natural flows and allow for the expansion of wetlands. Any change in the roadway design that would reduce the acreage of wetlands restored or otherwise reduce the ecological functions of the Project, is not justifiable as part of this critical ecosystem restoration Project, and should be rejected. MR-12

Again, thank you for the opportunity to comment.

Sincerely,

Barbara Salzman

Barbara Salzman, Co-chair
Conservation Committee

13 July 2023

Veronica Pearson
Sr. Ecological Restoration Planner
Marin County Open Space District
3501 Civic Center Drive #260
San Rafael, CA 94903

Re: Support for the Bolinas Lagoon Wye Wetlands Resiliency Project

Comment Letter 12

Dear Ms. Pearson:

Audubon Canyon Ranch is writing in support of the Bolinas Lagoon Wye Wetlands Resiliency Project (the Wye Project).

Audubon Canyon Ranch (www.egret.org) has a staff of over 45 people, a group of 400 active volunteers, and roughly 1000 members, all of whom are passionate about the conservation of our natural resources here in Marin Co. and beyond. Audubon Canyon Ranch owns and manages a system of ecologically important lands in Marin and Sonoma counties including key land holding along Bolinas Lagoon. Since the early 1970's, Audubon Canyon Ranch has conducted scientific research, stewardship of natural areas, and education activities to help ensure the long-term protection of the valuable natural resources and public-trust values in Marin and Sonoma counties.

The County of Marin proposes to "…restore hydrologic, geomorphic, and ecologic processes in the Bolinas Wye (the Wye) wetlands to improve aquatic, wetland, and upland habitats, as well as maintaining existing transportation access along Olema Bolinas Road for the town of Bolinas during scenarios consisting of up to 5.5 feet of sea level rise (SLR) and a 100-year storm event (8 feet combined)." (p. 10, Initial Study/Mitigated Negative Declaration for the proposed Bolinas Lagoon Wye Wetlands Resiliency Project).

Staff at Audubon Canyon Ranch have read through the report (Initial Study/Mitigated Negative Declaration for the proposed Bolinas Lagoon Wye Wetlands Resiliency Project) and find that it adequately addresses potentially significant impacts to the local environment and suggests suitable mitigation actions in cases where impacts are found. We will note however that Ring-tailed Cats (*Bassariscus astutus*), which the report says have not been documented in the vicinity of the study area, are occasionally seen around Bolinas Lagoon. There is a Ring-tailed Cat in the Cal Academy collection that was found dead at a residence along Bolinas Lagoon back in 1986. According to local natural history expert of Bolinas, Keith Hansen, there have been various sightings around the lagoon

MR-8

over the past decades, including recent ones in 2023 along Horseshoe Hill Rd. (Keith Hansen, pers. comm. 13 July, 2023). That said, it is unlikely that the project will impact Ring-tailed Cats.

Overall, Audubon Canyon Ranch is confident that the Wye Project will restore natural processes to the Bolinas Wye Wetlands for fish, amphibians, bats, and birds like the Black Rail. Additionally, the project will help mitigate chronic flooding along the Bolinas-Olema Road that occurs regularly. This is critical since flooding is likely to increase under even the most conservative current Sea Level Rise (SLR) predictions. Addressing flood issues along the rest of Hwy 1 along Bolinas Lagoon will also be necessary in the near future.

MR-8

Thank you for giving Audubon Canyon Ranch the opportunity to comment on the proposed Bolinas Lagoon Wye Wetlands Resiliency Project report.

We are pleased to support the Wye Project.

Sincerely,

Nils Warnock, Ph.D.
Director of Conservation Science

Marin Chapter
California Native Plant Society

August 6, 2023

Comment Letter 13

Hello Marin County Parks:

The following comments are submitted on behalf of the Marin Chapter of the California Native Plant Society (Marin CNPS) regarding the IS/MND for the Bolinas Wye project. MR-8
The California Native Plant Society is an organization of nearly 10,000 members statewide dedicated to conserving native plants and their natural habitats and to increasing the understanding, appreciation, and horticultural use of native plants. Marin CNPS has about 500 members.

We have reviewed the introduction and the biological portion of the IS/NMD document. We conclude that, as the result of thoughtful planning by multiple scientific and local groups concerned with the ecological condition of Bolinas Lagoon, the project should proceed. We are pleased that the reworking of the intersection of Lewis Creek, Route 1 and the Olema/Bolinas Rd. will restore ecological processes, increase sedimentation into the upper reaches of the Lagoon and remove the extensive stands of non-native, invasive plants in the project area. MR-8

We note that a survey for rare plants was conducted and that none were found in the project area. Our only comment is that the IS/MND should specify that, if topsoil is needed to achieve the desired grade after removal of invasive plants, that care be taken to use soil that is not infested with invasive plant material, seeds, roots or propagules. IS/NMD at 20.

Thank you for your attention.

--Carolyn Longstreth, Director
Marin Chapter, California Native Plant Society

Carolyn K. Longstreth

MARIN CONSERVATION LEAGUE

Protecting Marin Since1934

August 7, 2023

Comment Letter 14

To: Marin County Open Space District

3501 Civic Center Drive #260

San Rafael, CA 94903

Attention: Veronica Pearson vpearson@marincounty.org

Subject: Bolinas Lagoon Wetlands Resiliency Project/ Initial Study/Mitigated Negative Declaration

Dear Ms. Pearson:

Marin Conservation League appreciates the opportunity to comment on the adequacy of the subject Project's Initial Study/Mitigated Negative Declaration. In accord with the Findings of the County Environmental Coordinator, MCL agrees that the significant effects of the Project have been fully identified and mitigated by modifications in the project so that potential adverse effects are reduced to a point where no significant effects would occur. Furthermore, MCL would like to note that, with one exception, the IS/MND is generally a thorough, clearly written, and useful document that will help the public comprehend a very complex project.

Our exception to unqualified approval of the document, discussed below, lies in the lack of consistent terminology in describing and mapping existing plant communities, the plant palettes specified for revegetation, and the mapping of post-restoration biological communities. This makes for a confusing disconnect between proposed action (revegetation) and result (post-restoration condition).

MR-8

Background and Project History

MCL's interests in the Project are based on our appreciation of the history and unique values of Bolinas Lagoon and how the Project would impact them, as sketched below. Bolinas Lagoon is known for its distinctive merging of freshwater inflows, both above and below ground, with salt water and the consequent varied mix of vegetative communities and habitats ranging from subtidal to high salt marsh to brackish and freshwater wetland and adjacent riparian and upland. The Lagoon is recognized under the Ramsar Convention as a wetland of international habitat importance, and it is a significant component of the Golden Gate Biosphere Reserve.

The Lagoon also has a long and varied history of human uses, all of which have contributed to a highly modified hydrologic and geomorphic regime that has been the subject of extensive study and

management recommendations for many decades. The hydrology and native habitats at the north end of the lagoon have been particularly altered by the presence of transportation routes that now constrain the natural drainages and floodplain of Lewis Gulch and Wilkins Gulch Creek entering from the north and north-east. In addition to constricting natural habitats, the roadways themselves are located where the floodplain of these creeks merges with high tidal marshes of the lagoon, and thus, even under today's sea levels, are subject to flooding during highest tides. This condition will only be exacerbated by rising sea levels.

The Bolinas Lagoon Wye Wetland Resiliency Project is designed to address these issues by relocating the intersection of Olema Bolinas Rd. with State Route 1; elevating the roadway south of the intersection and bridging it over Lewis Gulch Creek; stabilizing banks and realigning Lewis Gulch Creek to allow the creek to reconnect with its floodplain within the wye; eliminating the Fairfax Bolinas "Crossover" road and restoring the native wetland habitats; and removing invasive plants. Together, these actions will significantly benefit the area's resiliency to sea level rise and enhance fish and wildlife habitats.

The "Wye" project is roughly equivalent to what was identified as Phase 1 in a Conceptual Design Report prepared as a "Vision" for restoring the North End of Bolinas Lagoon. That concept would encompass a larger geographic area, however, including Wilkins Gulch Creek, which also drains into the lagoon, and other properties beyond the lands and waters owned by the Marin County Open Space District (MCOSD). The MCOSD Board of Directors determined that the proposed ("Phase 1") Project could proceed as a stand-alone project, without compromising the opportunity for the larger concept to go forward in the future.

MR-8

The Bolinas Lagoon North End Restoration Project Vision was first presented to MCL's Parks and Open Space Committee about five years ago, and since that time MCL has received periodic briefings as the current "Wye" project evolved out of the larger concept. MCL's view is that the current Project is the outcome of rigorous study and will not only help to resolve the problems described above but open up opportunities to enhance the habitats that characterize the north end of the Lagoon.

<u>Resolution of Potential Adverse Effects is Satisfactory</u>

The thumbnail outline of the Project above does not do justice to its numerous parts. As stated above and in the IS/MND, the Project is complex! Therefore, we appreciate the detailed description of elements, such as the roadway and bridge construction, placement of pilings and engineered fill in unstable soils, use of heavy equipment, difficult access, and need for phasing over a two year period, in part to avoid nesting seasons for special-status fish and wildlife, and in part to allow for settlement. The opportunity for significant impacts to sensitive resources during the two-year process is considerable, however. MCL's review of the main design features of the Project described above, together with incorporating Conservation Measures listed on Page 30 (equivalent to Best Management Practices) into the Project, assures that the project in many respects is self-mitigating. The listed Mitigation Measures add further assurance that during construction all means will be taken to avoid disturbing sensitive species and minimize disrupting fish and wildlife movement, and that all areas where vegetation is removed will be replanted with appropriate native species and monitored.

Classification of vegetation communities is not consistent and therefore confusing

It appears that more than one classification scheme has been used to characterize vegetation in the project area. The first appears under the detailed descriptions of project elements, in Section I, Long-Term Revegetation Management Actions. The text in Subsection ii, Plant Palettes (Page 26), states "As described below, there are nine vegetative communities mapped on the site." In fact, there is no further description of these communities, and only eight are listed. Although not further described, these communities form the basis of the plant palettes for revegetation, mapped as they will be installed in two phases, in Figures 13 – 17.

A second characterization of vegetation appears in the Biological Resources section of the IS/MND, which notes on Page 106 that 15 natural communities are present in the project area, 13 of which are "sensitive." The categories, based on their wetland type plus three upland categories, are listed, along with their typical plant species, in Table 13. They do not readily correspond to the communities listed on Page 26. Although the term "coastal brambles" appears in both classifications as a plant community present in the Project area (and included among the revegetation planting palettes), it does not appear in Table 13, nor are its dominant species identified anywhere. (Further investigation reveals that "coastal brambles" – also called "berry brambles" – consists primarily of three species of *Rubus* [native blackberry] and is listed in the California Natural Diversity Data Base as a "sensitive" natural community in California.) Figures 23 and 29 map the distribution of "Biological Communities" before and after restoration, respectively, using the wetland-based listing of communities in Table 13. Neither "Coastal Brambles" nor the other vegetation categories in the revegetation plan appear in Figure 29 – the post-restoration biological communities.

MR-8

Although a biologist can infer the likely correspondence between the two classification schemes, it is difficult to form a clear picture of the post-restoration condition of the area. A final, easy-to-read map of the post-restoration condition based on the revegetation plan would clear up the confusion.

In conclusion, although MCL as a Board has not taken a formal position of support for the Project, and will not do so until the IS/MND process concludes, we appreciate the significant effort that has been made to reach a design that is well-suited to meet its objectives.

Yours truly,

Terri Thomas

Terri Thomas, President

Marin Conservation League

Nona Dennis

Board Member Emeritus

wra

Rob Carnachan <robert.carnachan@wra-ca.com>

Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Laura Berryman

Laura Berryman <noreply@formresponse.com> Fri, Aug 4, 2023 at 5:00 PM
Reply-To: laura.berryman@me.com
To: rpassantino@marincounty.org, vpearson@marincounty.org, khyde@marincounty.org, robert.carnachan@wra-ca.com

Comment Letter 15

MARIN COUNTY
PARKS
PRESERVATION · RECREATION

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Name	Laura Berryman
Email	laura.berryman@me.com
Zipcode	94924
Comments	We are concerned about the noise of the construction. Can you be more specific about what measures the county is taking to mitigate the noise during the two year project. Thank you, Todd & Laura Koons

MR-10

You can edit this submission and view all your submissions easily.

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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Greater Farallones and Cordell Bank National Marine Sanctuaries
991 Marine Dr., The Presidio
San Francisco, CA 94129

August 4, 2023

Comment Letter 16

Veronica Pearson
Project Manager
Marin County Parks
3501 Civic Center Drive, Suite 260
San Rafael, CA 94903

Sent Via Email: vpearson@marincounty.org

RE: Comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Bolinas Wye Wetlands Resiliency Project

Dear Ms. Pearson:

Thank you for providing the National Oceanic and Atmospheric Administration, Greater Farallones National Marine Sanctuaries (GFNMS or sanctuary) the opportunity to review and comment on the draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Bolinas Wye Wetlands Resiliency Project. We understand the proposed project goal is to restore physical and ecological linkages between Lewis Gulch Creek and Bolinas Lagoon by realigning both Olema Bolinas Road and Lewis Gulch Creek and removing an extension of Fairfax Bolinas Road (Crossover Road). Further, the project will restore hydrologic, geomorphic, and ecological processes in the Bolinas Wye wetlands to improve the resiliency of in stream, tidal wetlands, riparian, and upland habitats to sea level rise and climate change. We appreciate the opportunity to provide comments on the proposed project and recognize the important work that Marin County Parks (County) is doing to develop and implement nature-based solutions to address climate change impacts to coastal habitats.

Bolinas Lagoon is a 1,100-acre tidal estuary, located in Marin County within the boundaries of Greater Farallones National Marine Sanctuary (GFNMS), with unique open water, mudflat, and marsh habitats that support a diverse population of marine, terrestrial, and plant species. The Lagoon's important ecosystem services and recreational opportunities also contribute to its designation as a Ramsar wetland of international importance, part of the UNESCO-designated Golden Gate Biosphere, and an Audubon Important Bird Area. For all these reasons the Lagoon is a priority restoration site for the marine sanctuary.

GFNMS is writing to express support for the proposed project as it aligns with the sanctuary's mission to protect and conserve this vital coastal ecosystem by supporting the processes that allow it to evolve naturally and enhance its ability to adapt to future changes. The Bolinas Wye Wetlands Resiliency Project is consistent with the restoration strategies for Bolinas Lagoon included in the sanctuary's Coastal Resilience Sediment Plan (Sediment Plan), developed in 2019 as a roadmap of recommendations for coastal resilience along the North-central California coast over the next 50 years. Further, the sanctuary has worked with the County, since 2008, to

MR-1

directly develop the goals of this project through the development of the Bolinas Lagoon Ecosystem Restoration Project: Recommendations for Restoration and Management. Both of these projects were highly collaborative processes based on recommendations from the GFNMS Sanctuary Advisory Council, comprised of scientists, local stakeholders, environmental groups, and state and federal agency representatives. Since its release in 2008, the sanctuary and its partner agencies have used this document as a guide for achieving our common vision of a naturally thriving and ecologically healthy Bolinas Lagoon.

As noted in Section IX of the draft IS/MND, the project will involve a number of prohibited activities in the sanctuary that require the issuance of an Office of National Marine Sanctuaries permit. A complete list of sanctuary regulations can be found here: https://www.ecfr.gov/current/title-15/subtitle-B/chapter-IX/subchapter-B/part-922 (See Subpart H: Greater Farallones National Marine Sanctuary). GFNMS looks forward to working with the County to ensure that the final project design is consistent with the sanctuary's environmental compliance and regulatory requirements.

MR-1

The Bolinas Wye Wetlands Resiliency Project will accomplish multiple objectives that benefit the sanctuary including increasing the tidal prism of the lagoon to adapt to sea level rise, creating more resilient marsh habitat, and improving hydrologic circulation and water quality in the lagoon. We appreciate the County's partnership with the sanctuary and commend the efforts of the County to continue to bring this important project to fruition. We also look forward to continue working with you as an active partner on future climate resilience and sediment management projects. Please contact Max Delany at max.delaney@noaa.gov if you have questions regarding the sanctuary's support or regulations or Lilli Ferguson at lilli.ferguson@noaa.gov for any permit related questions.

Sincerely,

Maria Brown

Maria Brown
Sanctuary Superintendent
Greater Farallones and Cordell Bank National Marine Sanctuaries

4911 Central Ave
Richmond, CA 94804
415-699-3586

July 28, 2023

Comment Letter 17

To Whom it May Concern,

The San Francisco Bay Joint Venture (SFBJV) is writing in support of the Bolinas Lagoon Wye Wetlands Resiliency Project - an SFBJV adopted project. The SFBJV has provided technical support which identifies this project as a priority on the list of recommended actions in the Bolinas Lagoon Ecosystem Restoration Project – Recommendations for Restoration and Management. Actions include bolstering climate resilience by supporting the larger Bolinas Lagoon North End Project which would reconnect wetlands to their alluvial fans and allow space for wetland migration under rising seas.

The project exemplifies the SFBJV goals to "protect, restore, and enhance healthy habitats that comprise whole conserved ecosystems to benefit the myriad of native species that rely on them for part or all of their lifecycle." The Bolinas Lagoon estuary is an Internationally recognized Ramsar Wetland and is important for migratory birds, and resident birds, such as the California Black Rail, which will benefit from the habitat that will be created for landward migration of vitally important high tide marsh with future sea level rise. Also important is the refugia that will be provided for anadromous fish that support the ecosystem, and the restoration of ecosystem processes with reconnection of Lewis Gulch Creek to its alluvial fan and floodplain. These actions are priorities for our outer coast, coastal estuaries, and coastal stream valley regions.

MR-1

We are excited to see the project make it to this important marker in project development. In the face of climate change, and the impacts from rising seas, this work is more time-sensitive than ever. The SFBJV will continue to support projects like these that tie together economic, community, and ecological benefits; and we hope to see project implementation move forward. If you have any questions regarding SFBJV support, please contact Nikki Roach, at nroach@sfbayjv.org.

Sincerely,

Nikki Roach, PhD

Nikki Roach

San Francisco Bay Joint Venture Policy & Communications Coordinator

The Bolinas Rod and Boat Club

Post Office Box 148, Bolinas, Ca.94924 8/6/2023

To: Veronica Pearson Senior Ecological Restoration Planner

Comment Letter 18

Re: North Bolinas Lagoon Project

The Bolinas Rod and Boat Club would like to express our strong support for the above referenced project. Its components are of unquestioned benefit to the public and environmental stewardship of the Lagoon, as well as traffic safety on Highway 1.

Additionally, the proposed work benefits several threatened and endangered species, including California Black Rail as well as Steelhead Trout and Coho Salmon, two species iconic to Coastal California. The re-alignment of Lewis Creek and an improved riparian and estuary corridor will encourage heightened usage of these salmonids.

MR-1

Thank you for your consideration of this excellent project.

Rudi Ferris for the Bolinas Rod and Boat Club.

GREATER FARALLONES ASSOCIATION

August 8, 2023

Comment Letter 19

Marin County Parks
3501 Civic Center Drive, Suite 260
San Rafael, CA 94903

RE: **Comment on Initial Study/Mitigated Negative Declaration for the proposed Bolinas Lagoon Wye Wetlands Resiliency Project**

Dear Marin County Parks:

On behalf of the Greater Farallones Association (Association), I am writing to express strong support for Marin County Parks' (MCP) proposed Bolinas Wye Wetlands Resiliency Project (Project). The Association is the non-profit partner of the Greater Farallones and Cordell Bank National Marine Sanctuaries (Sanctuaries) and our shared mission is to ensure Sanctuary ecosystems remain healthy, globally significant ocean environments. Over the past decade, the Association has worked with the towns of Bolinas and Stinson Beach, and the community of Seadrift, to plan and implement restoration projects in Bolinas Lagoon; in the process, we have developed a strong sense of the communities' enthusiasm for restoring and protecting the Lagoon.

We work closely with the Sanctuaries and MCP to protect this internationally recognized estuary located within Greater Farallones National Marine Sanctuary. The *2008 Bolinas Lagoon Ecosystem Restoration Project: Recommendations for Restoration and Management*, a guidance document that prioritizes long-term climate adaptation planning for the lagoon, was developed through a working group formed by the Sanctuary's stakeholder-led advisory council. MCP's Project stems directly from this community-supported document and provides several benefits that strengthen lagoon function and resilience including: 1) improved creek and floodplain function; 2) transitional and wetland habitat enhancement; 3) special status species protections, and; 4) sea level rise and storm surge adaptation.

MR-1

We commend the MCP's efforts to take action to reduce potentially significant environmental impacts to a less than significant level, and to restore hydrologic, geomorphic, and ecological processes in the Bolinas Wye wetlands to improve aquatic, wetland, and upland habitats. We feel this Project complements our own restoration work, including the Bolinas Lagoon South End Living Shorelines Project, and furthers our mutual goals of long-term solutions for creating and sustaining resilience for the Bolinas Lagoon ecosystem.

We are confident MCP's experienced project team will ensure a community-supported final design that protects and enhances essential wildlife habitat while incorporating critical climate resilience measures.

MR-1

Thank you for your time in reading this letter and for the opportunity to comment.

Sincerely,

Deb Self
Executive Director
Greater Farallones Association
www.Farallones.org

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area, Interior Region 10
Building 201, Fort Mason
San Francisco, CA 94123-0022

IN REPLY REFER TO:

1B (GOGA-NR)

Memorandum

Comment Letter 20

To: Veronica Pearson, Project Manager, Marin County Parks

From: David Smith, General Superintendent, Golden Gate National Recreation Area

Subject: Environmental Review of the Bolinas Lagoon Wye Wetlands Resiliency Project

Golden Gate National Recreation Area (GGNRA) is a neighboring land manager to the Bolinas Wye Wetlands and the important lagoon, wetlands and other ecosystems of the Bolinas area. We have participated in the planning process for this area's restoration and see significant value to the wetlands. This riparian system supports important species such as salmon, trout and black rail. We are pleased to see the project includes sea level rise and flooding measures, as well as road safety improvements. We look forward to working on this project with Marin County Parks and the OneTam collaborative.

MR-1

David Smith
General Superintendent, Golden Gate National Recreation Area

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Rob Carnachan <robert.carnachan@wra-ca.com>

Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Mark Dettling

Mark Dettling <noreply@formresponse.com> Fri, Aug 4, 2023 at 2:32 PM
Reply-To: mark.dettling@gmail.com
To: rpassantino@marincounty.org, vpearson@marincounty.org, khyde@marincounty.org, robert.carnachan@wra-ca.com

Comment Letter 21

MARIN COUNTY
PARKS
PRESERVATION·RECREATION

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Name	Mark Dettling
Email	mark.dettling@gmail.com
Zipcode	94938
Comments	I would like to voice my support for the proposed project. As a local resident that frequently uses Olema Bolinas Road, I know how critical it is that the road remain passable during storms as well as into the future with projected sea level rise. As a biologist, I am very happy to see how this project addresses reconnecting Lewis Gulch Creek to Bolinas Lagoon in a more natural way that will benefit humans and wildlife alike. While the initial construction and creek realignment will require removal of trees and vegetation, I think that the habitat will be improved in the long run. Please to make sure to hire contractors that are sensitive to the importance of the area to the entire Bolinas Lagoon.

MR-1

You can edit this submission and view all your submissions easily.

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Rob Carnachan <robert.carnachan@wra-ca.com>

Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Ralph Camiccia

Ralph Camiccia <noreply@formresponse.com> Sun, Aug 6, 2023 at 11:16 PM
Reply-To: rjc.bolinas@sbcglobal.net
To: rpassantino@marincounty.org, vpearson@marincounty.org, khyde@marincounty.org, robert.carnachan@wra-ca.com

Comment Letter 22

MARIN COUNTY
PARKS
PRESERVATION · RECREATION

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Name	Ralph Camiccia
Email	rjc.bolinas@sbcglobal.net
Zipcode	94924
Comments	Veronica Pearson Sr. Ecological Restoration Planner I want to take a moment to express my support and approval of the Bolinas Lagoon North End Project. The August 4th field trip offered by Marin Open Space & Parks Department was very informative and educational. There is little doubt that we need to correct the poor environmental decisions that were made eighty years ago, we just did not have the knowledge and scope that we now have. This is a rare opportunity to realign Lewis Creek to what is the more natural course it would take to the Bolinas Lagoon. This action will certainly improve the riparian vegetation which will improve the natural habitat for the wildlife and flora that inhabit the area. Also, just as important, is access to the coast that will be greatly improved by correcting the intersection of the Bolinas Olema Road and State Route One, which has proven to be a very dangerous intersection. It is not necessary to add that Bolinas has become a very active visitor destination for surfing, fishing, and beach activities, all of which will gain much benefit from this project. Sincerely Yours, Ralph Camiccia Bolinas, CA

MR-1

You can edit this submission and view all your submissions easily.

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Rob Carnachan <robert.carnachan@wra-ca.com>

FW: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Douglas Lee

Pearson, Veronica <vpearson@marincounty.org> Tue, Jul 11, 2023 at 5:40 PM
To: Rob Carnachan <robert.carnachan@wra-ca.com>
Cc: "Hyde, Kelly" <khyde@marincounty.org>

See comment below

From: Douglas Lee <noreply@formresponse.com>
Sent: Tuesday, July 11, 2023 3:34 PM
To: Passantino, Rosemary <RPassantino@marincounty.org>; Pearson, Veronica <vpearson@marincounty.org>; Rob LaPorte <rlaporte@parksconservancy.org>; Hyde, Kelly <khyde@marincounty.org>
Subject: Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Douglas Lee

Comment Letter 23

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Name	Douglas Lee
Email	civilbass@gmail.com
Zipcode	94924
Comments	Nice work! Thank you all for your outstanding service to the community and environment. I support the project.

MR-1

You can edit this submission and view all your submissions easily.

Email Disclaimer: https://www.marincounty.org/main/disclaimers

1
0K

Rob Carnachan <robert.carnachan@wra-ca.com>

FW: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - NIC SHILZONY

Pearson, Veronica <vpearson@marincounty.org> Tue, Jul 11, 2023 at 5:40 PM
To: Rob Carnachan <robert.carnachan@wra-ca.com>
Cc: "Hyde, Kelly" <khyde@marincounty.org>

Another comment letter

From: NIC SHILZONY <noreply@formresponse.com>
Sent: Thursday, July 6, 2023 8:22 AM
To: Passantino, Rosemary <RPassantino@marincounty.org>; Pearson, Veronica <vpearson@marincounty.org>; Rob LaPorte <rlaporte@parksconservancy.org>; Hyde, Kelly <khyde@marincounty.org>
Subject: Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - NIC SHILZONY

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Comment Letter 24

Name	NIC SHILZONY
Email	NSMV81@gmail.com
Zipcode	94903
Comments	Bolinas lagoon is long overdue for restoration! As we all know, the lagoon and Pine gulch creek was a major hub for wild life for thousands of years and has been taken away from being natural by typical human greed. August 11, 2022 , Marin Independent Journal had an article about the Coho trying to come back. We are on the

MR-1

right track but a lot more needs to be done. Thank you!
Nic S. Marinwood, CA

MR-1

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Rob Carnachan <robert.carnachan@wra-ca.com>

FW: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Wendy Botwin

1 message

Pearson, Veronica <vpearson@marincounty.org> Thu, Jul 13, 2023 at 11:10 AM
To: Rob Carnachan <robert.carnachan@wra-ca.com>

From: Wendy Botwin <noreply@formresponse.com>
Sent: Thursday, July 13, 2023 9:06 AM
To: Passantino, Rosemary <RPassantino@marincounty.org>; Pearson, Veronica <vpearson@marincounty.org>; Rob LaPorte <rlaporte@parksconservancy.org>; Hyde, Kelly <khyde@marincounty.org>
Subject: Re: IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project - Wendy Botwin

IS/MND Public Comments Bolinas Lagoon Wye Wetlands Resiliency Project

Comment Letter 25

Name	Wendy Botwin
Email	2dancingtree@gmail.com
Zipcode	94924
Comments	I support every aspect of this plan on behalf of the human and more than human community. Thank you for all the detailed thoughtfulness.

MR-1

You can edit this submission and view all your submissions easily.

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Rob Carnachan

Comment Letter 26

From: Will Bartlett <will@bolinascivicgroup.org>
Sent: Thursday, July 13, 2023 9:05 AM
To: Wendy Botwin
Cc: Pearson, Veronica; Pearlman, Isaac
Subject: Re: Bolinas Civic Group sea level rise presentation

I agree! Thank you so much for showing your on Zoom! I apologize for the lack of communication during the meetings. I am using all my personal devices to make them happen and it's hard to keep the comma going.

Really loved the preso tho. Excited about such a project finally coming to fruition and excited about the county's efforts to elegantly solve human problems by returning the habitat to its natural state.

MR-1

Thanks so much and I can't wait for more collaboration with your office as we start to tackle the work of bringing the community to the table to address the pressing issue it will face.

-Will

William Bartlett
408-707-8684
P.O. Box 712
Bolinas, CA
94924

> On Jul 12, 2023, at 19:03, Wendy Botwin <2dancingtree@gmail.com> wrote:
>
> Your presentation is excellent! Thanks to you and Isaac!
> 🙏🏽 Wendy
>
> > On Jul 12, 2023, at 6:40 PM, Pearson, Veronica <vpearson@marincounty.org> wrote:
> >
> > No worries!
> >
> > Get Outlook for iOS
> >
> > ---
> > **From:** Wendy Botwin <2dancingtree@gmail.com>
> > **Sent:** Wednesday, July 12, 2023 6:39:52 PM
> > **To:** Pearson, Veronica <vpearson@marincounty.org>
> > **Cc:** Will Bartlett <will@bolinascivicgroup.org>
> > **Subject:** Re: Bolinas Civic Group sea level rise presentation
> >
> > Sorry it's running a little late, I think.

Save Our Seashore
A 501(c)(3) Charitable Organization (EIN 94-3221625)
Founded in 1993 to Protect Marin County's Ocean, Coasts, Estuaries, Watersheds and Creeks
40 Sunnyside Dr, Inverness CA 94937 gbatmuirb@aol.com 415-663-1828

Comment Letter 27

August 11, 2023

To: Veronica Pearson, Senior Ecological Restoration Planner, Marin County Open Space District

Re: Bolinas Lagoon Wye Wetlands Resiliency Project (Wye Project)

We understand that the public comment period for the Wye Project's Initial Study/Mitigated Negative Declaration has been extended to September 1 (although the website still states that the public comment period ended on August 8). Regardless, we hope that you find our comments useful in three areas of concern: black rail concerns, community concerns and historical concerns.

As background, when I headed the Marin Sierra Club, I led the very unpopular opposition to the very popular dredging project proposed for the Lagoon. Subsequent studies showed that our opposition was well founded in science and that the major concern for Bolinas Lagoon was not excess sedimentation, but rather Sea Level Rise…thus the over-arching Bolinas North End Study and this specific Wye Project.

Black Rail Concerns

The Wye Project is outlined in the Bolinas North End Study (NES), but there appears to be a contradiction between the NES and the Wye's Initial Study/Mitigated Negative Declaration (IS/MND) in regard to the California state threatened California black rail (Laterallus jamaicensis coturniculus).

The NES Site Conditions report does not indicate any black rail habitat in Lewis Gulch Creek (NES Figure 6 shows black rail habitat only along Salt Creek and NES Appendix C has no record of black rails in Lewis Gulch Creek). In contrast, IS/MND) page 11 states (without citation) *"Lewis Gulch Creek is known to have a population of…California state threatened California black rail."* The contradiction between these two documents should be clarified.

Further clarification is needed for two sentences on IS/MND Page 12. The first sentence notes *"A recent U.S. Geological Survey (USGS) report (Thorne, et al., 2016) found that by 2100, Bolinas Lagoon's low tidal marsh would be completely submerged with 1.4 feet of SLR. A large portion of this marsh loss would be habitat for the state-listed California black rail…"*

MR-8

The following sentence notes, *"As discussed in the AECOM Site Conditions Report (AECOM, 2016), one of the most important benefits of the proposed Project is to address mid- to late-century SLR projections and ameliorate potential wetlands loss due to SLR by restoring natural hydrological and geomorphic processes and removing barriers to upland migration."* Together, the two sentences imply that the Wye Project will restore natural hydrological and geomorphic processes and remove barriers to upland migration for the black rails that the first sentence calls out as particularly at risk….but the IS/MND does not appear to support this implication. For example, IS/MND Figure 23 shows tidal marsh (presumed black rail habitat) present now, but Figure 18 shows that same black rail habitat under water in 2050.

Further, IS/MND page 10 notes, *"The new approach to SR-1 would include a bridge over Lewis Gulch Creek that would allow for lateral stream migration and provide a wildlife corridor."* While a wildlife corridor would be useful for many species as Sea Level Rise pushes their habitats upland, it does not appear to function that way for black rails. IS/MND Figure 18

indicates that in 2050, Lewis Gulch Creek above the new bridge appears to be an incised channel with limited to no black rail habitat thus the bridge's wildlife corridor could be a corridor to nowhere for black rails.

In sum, the Wye Project appears to do nothing for black rails other than temporarily postpone the elimination of their habitat in the project area. The project that could benefit black rails is a Caltrans culvert replacement to restore natural hydrological and geomorphic processes and remove barriers to upland migration on Wilkins Gulch Creek, Salt Creek, Pike County Gulch and the creek at Audubon Canyon Ranch, but there is no guarantee that such a project will be done by another agency at a future time with unsecured funding for a design helpful to black rails. Thus the Wye Project should eliminate any implication that it will benefit black rails.

MR-8

A similar potential misappropriation of black rail benefits is seen on IS/MND page 34, which notes that *"several notches would be created in the existing berm/dredge spoils pile to the south bank of the creek. The notches would allow flood flow conveyance, while providing high ground refugia for species such as California black rail."* However, such "island" rail habitats are known to be death traps, not refugia, as the island's restricted area facilitates predation of the rails (Rich Stallcup personal communication). Instead of islands to retreat to at high tides, black rails need to retreat to contiguous and continuous tidal uplands. Thus the Wye Project should entirely remove the berm/spoils pile (and the reference to the proposed notches benefiting black rails).

Community Concerns

As well as the Lewis Gulch Creek Bridge wildlife corridor possibly being a corridor to nowhere for black rails, the bridge at 5.5 feet of Sea Level Rise will also be a bridge to nowhere for Bolinas residents unless the lower segments of the Bolinas Fairfax Road (between the Project site and the Mesa Road intersection) are similarly elevated. The IS/MND indicates that the Project's un-used spoils will be trucked over the hill and disposed of in Redwood landfill. That is fine if these spoils are truly un-useable for road or berm construction, but to the extent that excess spoils from the Wye Project could be used to elevate the Bolinas Fairfax Road, they should be kept in the vicinity for future use.

MR-3

Historical Concerns

Lastly, IS/MND page 145 notes, *"The Marin Conservation League had succeeded in preserving part of the Tomales Bay shore, but most of the bay, Point Reyes, Olema Valley, and the Bolinas Lagoon regions remained unprotected and open to development."* While there is no doubt that the Marin Conservation League played a key role in protecting the referenced areas, it would be remiss for the IS/MND not to mention the at-least-equal if not more important protective role played by Dr. Marty Griffin and his cohorts at Audubon Canyon Ranch. As his book *"Saving the Marin-Sonoma Coast"* documents, Dr. Griffin et al saved Kent Island from being developed into a Bolinas Lagoon marina and purchased multiple parcels along Tomales Bay to prevent large scale corporate development.

MR-9

Thank you for considering Save Our Seashore's comments.

Gordon Bennett
Save Our Seashore President

Save Our Seashore

A 501(c)(3) Charitable Organization (EIN 94-3221625)
Founded in 1993 to Protect Marin County's Ocean, Coasts, Estuaries, Watersheds and Creeks
40 Sunnyside Dr, Inverness CA 94937 gbatmuirb@aol.com 415-663-1828

Comment Letter 27b

August 16, 2023

To: Veronica Pearson, Senior Ecological Restoration Planner, Marin County Open Space District

CC: Tom Gardali, Nils Warnock, Jules Evens, Maria Brown

Re: Bolinas Lagoon Wye Wetlands Resiliency Project (Wye Project)

Veronica: My August 11 letter noted that the Bolinas Wye Project appears to have immediate and definite benefits for Red-legged frogs and for Steelhead, but only future and speculative benefits for black rails, which are arguably the most at risk of these three listed species in the Project area. Yesterday's phone call clarified many but not all the issues I raised in my August 11 letter, so to memorialize and expand on that call…

My August 11 letter noted that in general, the IS/MND was too vague about black rail benefits/impacts. As one example, it would have been helpful to see a Figure showing areas in the Project suitable for black rail nesting as well as areas suitable for high tide refugia. As another example, IS/MND Figure 29 shows the habitat map after restoration in 2025. Figure 18 shows most of the Project area under water in 2050 (due to sea level rise plus storm surge), but there is no Figure to show interim habitat changes in the interim 25 years between restoration and 2050. This interim is particularly important regarding black rails, because it appears that virtually their entire habitat within the Project area will be under water by 2050.

You noted in the call that because Lewis Gulch Creek was being restored to natural conditions (which will allow it to move and change) and because the frequency and intensity of future storms are unpredictable, it would be impossible to accurately predict interim habitat conditions. Nevertheless, I noted that during our phone call, you did predict that the increased deposition of sediment by the restored Lewis Gulch Creek could benefit black rails by adding tidal march habitat. You also predicted that the Project would create more upland refugia for black rails, both of which predictions support my main point.

MR-8

Your above predicted increase in the Project's black rail refugia is un-quantified in the IS/MND and thus is speculative. Further, that predicted increase in future refugia area will have no meaning if the rails that would use the refugia are no longer present in a tidal marsh that has been diminished in size…a reduction that the IS/MND does quantify as a 0.04 acre decrease in tidal marsh area due to the widening the Lewis Gulch Creek (Figure 29 vs Figure 23).

Your above predicted increase in the Project's black rail tidal habitat is also not quantified in the IS/MND and thus is also speculative. The IS/MND states that the restoration of the Creek above the new bridge will accommodate a 1.5 year bankfull flow but does not appear to specify the projected bankfull event frequency below the bridge. I recall you saying in the call that the Creek below the bridge would accommodate a 1-year bankfull event, which means that the Creek will deposit a considerable amount of its sediment onto the floodplain. Thus an un-quantified but likely comparatively little amount of sediment will be deposited past the mouth of the Creek to increase the tidal marsh area that you posited would offset the Project's 0.04-acre reduction in tidal marsh area. And there is no data to support the assumption that this relatively small amount of deposited sediment will outpace sea level rise such that this new sediment will actually create any tidal marsh usable by black rails.

But the IS/MND's 0.04 acres of tidal marsh reduction is a black rail impact that will be current and certain, not future and speculative. In my opinion, a decrease in tidal marsh area that is current and certain cannot be offset or mitigated by an increase in tidal marsh area that is future and speculative…and thus this 0.04-acre loss should be mitigated on a 2-to-1 basis (0.08 acres of constructed tidal marsh). I suggested lowering the elevation of 0.08 acres of the forested wetland adjacent to the current tidal marsh, but you responded that change would create possibly undesirable changes in the pattern of water flow through the Project. Perhaps.

But there appear to be several other opportunities in the Lagoon to add 0.08 acres of new tidal marsh. One opportunity might be to use soil excavated for the removal of the segment of the Bolinas Fairfax Road that now runs through the project. That soil could be added to the current subtidal area below the current mouth of Lewis Gulch Creek to create now and with reasonable certainty the 0.08 acres of tidal marsh that is speculated to be created in the future as the restored Lewis Gulch Creek deposits an unquantified amount of excess sediment in the Lagoon.

MR-8

Another opportunity may be to restore 0.08 acres of Winnebago Point, which is adjacent to known black rail habitat. Based on my inexpert review of the County parcel map, it appears that Winnebago Point belongs to Audubon Canyon Ranch (ACR) although Caltrans has used the Point to store spoils collected off SR 1. I believe both Caltrans and ACR participate in Project planning, which may facilitate clarification of the ownership of the Point. If ACR owns the Point, then ACR may be interested in allowing 0.08 acres of new black rail habitat to be created. My August 8 letter also noted the IS/MND's omission of ACR's contributions to saving Bolinas Lagoon. I defer to my colleagues at ACR (I serve on the ACR Board of Advisors) in these matters.

Lastly, the Project proposes to cut notches in a spoils pile that would create islands of high tide refugia for black rails. You stated that my alternate suggestion of removing the pile would create more impacts than the notches and that the islands would reduce predation of black rails vs the predation now occurring on the pile. But the IS/MND provides no predation data to document the predicted benefit to black rails from the notching that will create islands. Islands are known to facilitate predation of rail species because, at high tide, they limit the area available for concealment, a fact that opportunistic predators are well aware of. As a birder, I have personally observed such rail predation, but I am not a technical expert on black rails, so I will defer to the opinion of the black rail experts on the Technical Advisory Committee regarding the spoils pile.

Thank you for the phone call, which I found informative. I appreciate your willingness to respond per California Environmental Quality Act (CEQA) to my IS/MND comments despite my confusion of the deadlines for Technical Advisory Committee comments and public comments. I also appreciate your open-mindedness in the give-and-take during the phone call.

You have been involved in this Project far longer than I have. My active participation in Lagoon planning effectively ended with the withdrawal of the dredging project and my participation in formulating the subsequent Lagoon restoration recommendations by the stakeholder committee convened by Gulf of the Farallones…recommendations that 15 years later resulted in this Bolinas Wye project. The Wye Project is an over-all good project, especially when seen in the context of the other proposed Lagoon Projects.

MR-8

But sometimes a fresh look at a project can offer a perspective that is less-than-obvious to those in the details of that project. My urging of a 0.08-acre black rail mitigation is a late quirk in a 90% designed project that is not intended to be a monkey wrench, but rather is intended to (in my opinion) better conform the Project to CEQA and better balance Project benefits among all 3 listed species in the Project area.

While I am neither a CEQA expert nor a black rail expert, I do have some experience with both and was a math major at Harvard so I can subtract the 1.41 acres of After-Project tidal marsh from the 1.45 acres of Pre-Project tidal marsh. The resulting 0.04-acre reduction potentially impacts black rails…a concern that the IS/MND appears to gloss over. Thank you in advance for your careful consideration of this potential black rail impact.

Gordon Bennett

Gordon Bennett
Save Our Seashore President

TABLE A-1: MASTER RESPONSE KEY

Comment Letter	Commenter	Affiliation	MR-1	MR-2	MR-3	MR-4	MR-5	MR-6	MR-7	MR-8	MR-9	MR-10	MR-11	MR-12
1	Inho Kim	Caltrans		X	X	X	X		X	X	X	X		X
2	Robert M. Gailey												X	
3	Jennifer Blackman												X	
4	George Krakauer												X	
5	J Howard Dillon													X
6	Jennie Pfeiffer												X	X
7	Matt Lewis												X	
8	Sherry Hirsch												X	
9	Elia Haworth				X								X	
10	Lewis Samuels													X
11	Barbara Salzman	Marin Audubon Society						X		X			X	
12	Nils Warnock	Audubon Canyon Ranch								X				
13	Carolyn Longstreth	Marin Chapter CNPS								X				

Comment Letter	Commenter	Affiliation	MR-1	MR-2	MR-3	MR-4	MR-5	MR-6	MR-7	MR-8	MR-9	MR-10	MR-11	MR-12
14	Terri Thomas, Nona Dennis	Marin Conservation League								X				
15	Laura Berryman											X		
16	Maria Brown	Greater Farallones & Cordell National Marine Sanctuaries	X											
17	Nikki Roach	San Francisco Bay Joint Venture	X											
18	Rudi Ferris	The Bolinas Rod and Boat Club	X											
19	Deb Self	Greater Farallones Association	X											
20	David Smith	Golden Gate National Recreation Area	X											
21	Mark Dettling		X											
22	Ralph Camiccia		X											
23	Douglas Lee		X											

Comment Letter	Commenter	Affiliation	MR-1	MR-2	MR-3	MR-4	MR-5	MR-6	MR-7	MR-8	MR-9	MR-10	MR-11	MR-12
24	Nic Shilzony		X											
25	Wendy Botwin		X											
26	Will Bartlett	Bolinas Civic Group	X											
27	Gordon Bennett	Save Our Seashore			X					X	X			
27b	Gordon Bennett	Save Our Seashore								X				

ATTACHMENT 2: CHANGES TO THE IS/MND

The following minor changes have been made to the draft Initial Study. Deleted text is shown in ~~red, strike-out~~ and added text is shown in blue. This updated language and new figures provide additional information to augment that included in the IS/MND and does not identify any new potentially significant environmental impacts, does not require additional mitigation measures, nor require recirculation of the IS/MND.

PROJECT SETTING

Page 17, bottom two paragraphs:

> The Project site is vulnerable to SLR, as well as other climate change-related effects including prolonged drought and storms with high magnitudes and intensities. One of the goals of the proposed Project is to reduce the impact of SLR on the ecosystem and infrastructure. Many projections of SLR exist, and SLR estimates used for the Project are based on the Ocean Protection Council (OPC) State of California Sea-Level Guidance ~~(OPC, 2018)~~(CO-CAT, 2013).
>
> Improving the resiliency of the wetlands and infrastructure at the Project site is imbedded in the design objectives of the proposed Project. Resilience is the ability to recover quickly from disasters and to adapt to future conditions, such as SLR. To date, the accepted projections used for SLR planning are the State of California Sea-Level Guidance produced by the Ocean Protection Council (OPC, 2018). Using OPC's Table 1 (Projected Sea-Level Rise [in feet] for San Francisco), the Project is within the projections for specific greenhouse gas emissions scenarios (RCPs) for 2090 for low and high emissions (RCP 2.6 and 8.5 respectively), medium-high risk aversion (1 in 200 chance), resulting in up to 5.6 feet of sea-level rise. Table 2 presents the various tide scenarios used for the hydrologic and hydraulic modeling of the proposed Project that were determined by adding the predicted amount of SLR to current documented tide elevations.

PROJECT DESCRIPTION

Page 20, second full paragraph:

> The toe would be protected by a series of rootwads buried into the bank and bed of the channel on the outside meander bend. The rootwads would sit so they are aligned with the channel bank and their trunks extend into the bank. Two layers of coir fabric-encapsulated soil lifts between 6 and 8 inches in height would be installed above the rootwads along the bank, and a stone toe would be installed to reduce the risk of scour and undermining.

Page 26, ii. Plant Palettes, third sentence:

> The nine palettes are arroyo willow thicket, coyote brush scrub, coast live oak woodland, coastal brambles, red alder forest upland, red alder forest lowland, red alder forest lowland (former creek alignment), roadside grasslands, salt grass flats, and salt marsh bulrush marsh. These palettes are illustrated on Figure 31.

CONSTRUCTION

Page 28, B. Equipment:

Construction activities related to realigning the Lewis Gulch Creek channel would involve the use of small excavators, dozers, track trucks, and skip loaders to minimize the disturbance footprint. Dozers, scrapers, excavators, cranes, ~~pile-driving equipment,~~ rollers, compacters, and paving equipment would be used to construct proposed improvements to Olema Bolinas Road and the proposed bridge. The use of pile-driving equipment is not expected to be necessary; however, the presence of certain subsurface conditions that could be encountered on-site (solid rock, non-cohesive soils) could require the limited use of pile drivers.

FIGURES

Figure 4: Primary Project Components:

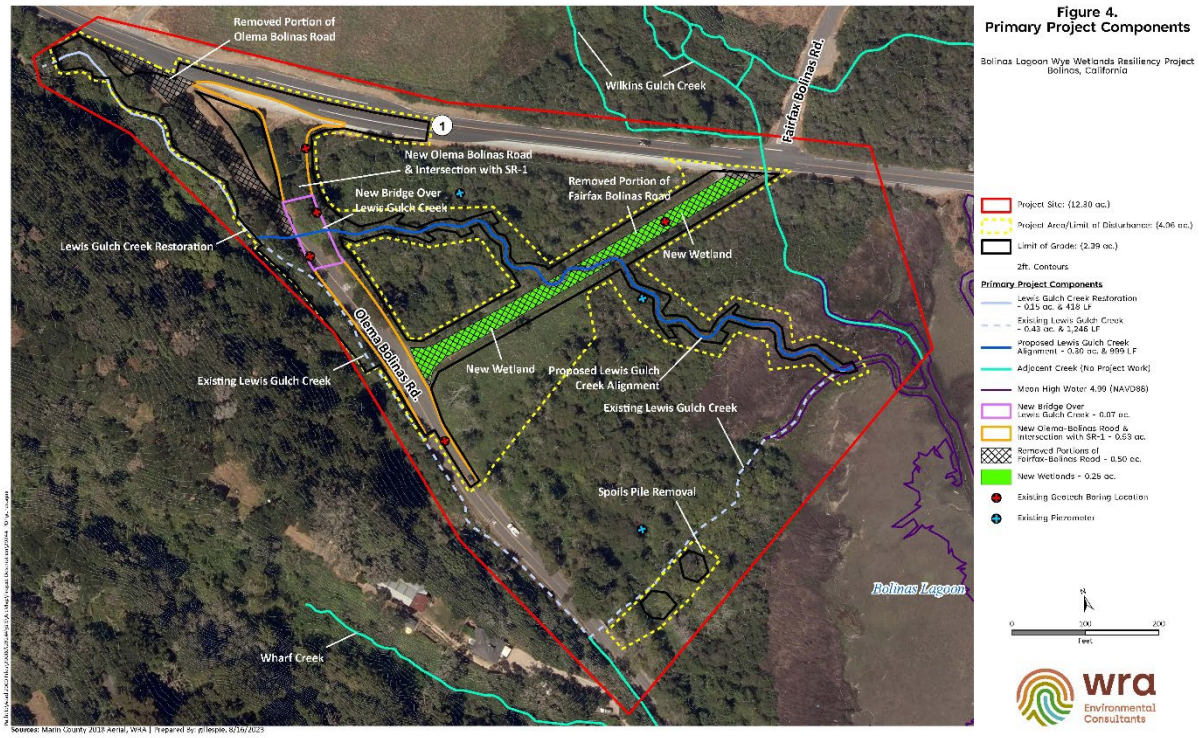
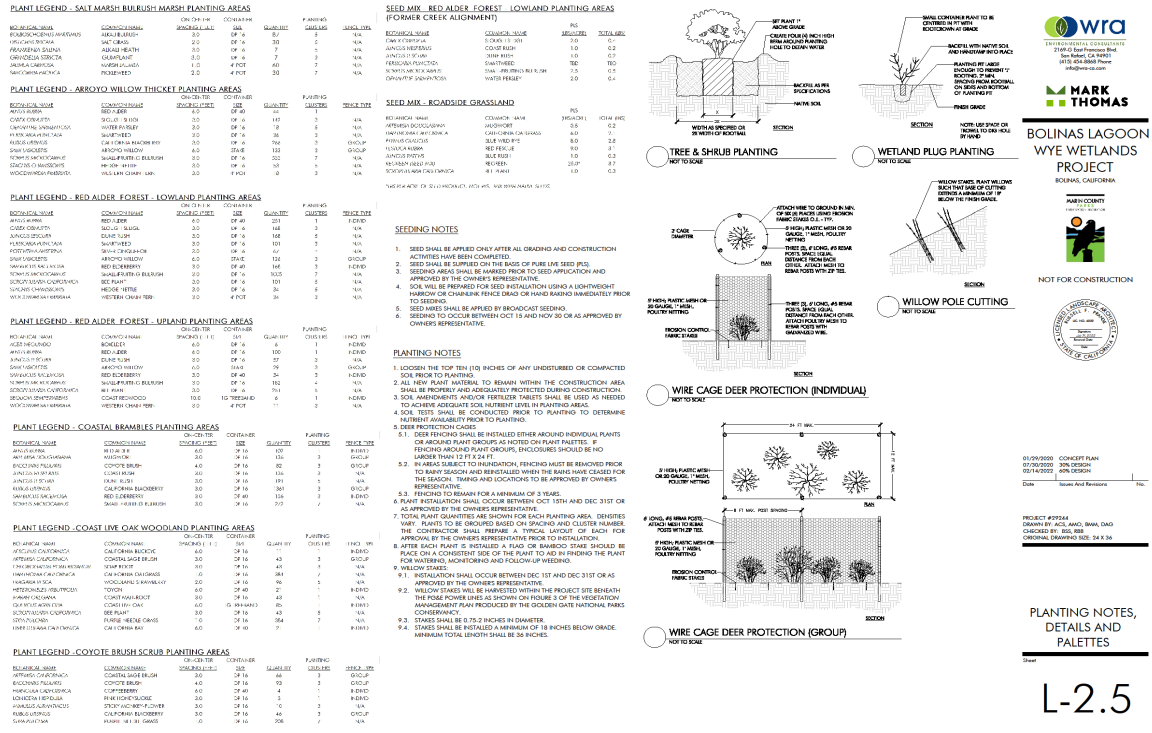


Figure 31: Proposed Revegetation Planting Palettes:



PROPOSED MITIGATION MEASURES

Page 80, Mitigation Measure CUL-1:

~~**Mitigation Measure CUL-1: Historical Resources**~~

~~If the SHPO concludes that the three road segments constitute a historic resource, the Project shall develop a Built Environment Treatment Plan (BETP) to resolve adverse effects and reduce the significance of impacts under CEQA to a less-than-significant level. The BETP should propose public interpretation and recordation measures that find acceptance from the Corps, SHPO, and the Marin County Parks and Open Space District in order to jointly address federal and state mandates to mitigate adverse effects and impacts. The BETP shall be attached to a Memorandum of Agreement between the Corps, the California SHPO, and the Advisory Council for Historic Preservation. The same BETP shall be used to reduce adverse CEQA impacts to a less-than-significant impact to historical resources.~~

Page 81, Mitigation Measures CUL-2 and CUL-3:

Mitigation Measure CUL-~~2~~1: Archaeological Resources Monitoring

Prior to Project implementation, a Cultural Resources Monitoring Plan (Plan) will be prepared by a qualified archaeological consultant. The Plan will discuss the monitoring procedures, field methods, communication protocols, and inadvertent discovery actions to be taken in the event archaeological resources are identified during monitoring and/or any Project activities. ~~Periodic spot-check monitoring will occur during the removal/demolition of the Crossover Road and f~~Full-time monitoring will occur during

vegetation removal at the location of the Oyster House. All monitoring will be carried out by a qualified archaeologist.

Mitigation Measure CUL-~~3~~2: Archaeological Resources Work Stoppage

Construction crews shall be trained in "basic archaeological identification" and have access to a Cultural Resources Awareness Sheet. The sheet shall photographically depict shell midden and associated indicators of archaeological sites, and clearly outline the procedures in the event of a new archaeological discovery. These procedures include temporary work stoppage (Stop-Work Order) of all ground disturbance, short-term physical protection of artifacts and their context, and immediate advisement of the archaeological team and MCOSD representatives. Any Stop-Work Order would contain a description of the work to be stopped, special instructions or requests for the Contractor, suggestions for efficient mitigation, and a time estimate for the work stoppage. The archaeologist shall examine the findings and assess their significance and offer recommendations for any procedures deemed appropriate to further investigate and/or mitigate adverse impacts to archaeological resources that have been encountered.

Page 81, Mitigation Measure CUL-4:

Mitigation Measure CUL-~~4~~3: Discovery of Human Remains

Upon discovery, the Coroner Division of the Marin County Sheriff's Office will be contacted for identification of human remains. The coroner has 2 working days to examine the remains after being notified. If the remains are Native American, the Coroner must notify the Native American Heritage Commission (NAHC) of the discovery within 24 hours. The NAHC will then identify and contact a Most-Likely Descendant (MLD). The MLD may make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the remains and grave goods. Once proper consultation has occurred, a procedure that may include the preservation, excavation, analysis, and curation of artifacts and/or reburial of those remains and associated artifacts will be formulated and implemented.

If the remains are not Native American, the Coroner will consult with the archaeological research team and the lead agency to develop a procedure for the proper study, documentation, and ultimate disposition of the remains. If a determination can be made as to the likely identity—either as an individual or as a member of a group—of the remains, an attempt should be made to identify and contact any living descendants or representatives of the descendant community. As interested parties, these descendants may make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the remains and grave goods. Final disposition of any human remains or associated funerary objects will be determined in consultation between the MCOSD and FIGR.

Page 84, Mitigation Measure TRAN-02:

Mitigation Measure TRAN-02: Construction Signage

Construction and detour warning signs shall be placed on SR-1 in advance of construction activities along the roadway for both northbound and southbound traffic. Additional signage, as well as traffic control personnel, may be required at the intersection based on proximity of construction activities to the roadway and whether any temporary modifications of the travel lanes are required. Detour signage shall also

be placed at both ends of Horseshoe Hill Road, indicating that this route is not suitable for use as a construction zone bypass.

During Year 2 construction, to the degree that construction materials are required to be transported across the road to and from the staging area, temporary traffic control shall be required. To the extent that the staging area encroaches upon the roadway, traffic control may be required to maintain adequate clearances. Construction warning signage shall be stationed upstream of active construction and staging areas.

AIR QUALITY

Page 101, Table 10 footnote:

Source: ~~CalEEMod~~ Air Quality CalEEMod Modeling Results; report is available upon request.

Page 102, Table 11 footnote:

Source: ~~CalEEMod~~ Air Quality CalEEMod Modeling Results; report is available upon request.

BIOLOGICAL RESOURCES

Page 120, Table 15 top row (Ring-tailed cat), fourth column (Potential for Occurrence):

No Potential. This ~~is a wideranging~~ secretive species ~~that uses a variety of woodland habitats. This species has never~~ has not been documented in the vicinity in any official database (e.g., CNDDB) and given that the Study Area is surrounded by roads it is unlikely the species would ~~remain undetected~~ occur due to the high levels of anthropogenic disturbance.

Pages 127 & 128, split paragraph:

Riparian Tree Removal – Less Than Significant with Mitigation Incorporated

An arborist report has been prepared to document existing trees on the Project site (WRA, 2021). Because the Project site is located within the Coastal Zone, the Marin County Native Tree Protection and Preservation ordinance does not apply. A total of 214 trees were identified within or directly adjacent to the Project site. Of these, 123 are proposed for removal during implementation of the Project. The proposed Project will require the removal of trees within oak woodland, forested wetlands, riparian, and similar habitats to accommodate grading and restoration of the new channel, relocation of the road at the junction of Olema Bolinas Road and SR-1, as well as construction of the new bridge. Trees within these habitats are subject to regulation by CDFW and RWQCB. These impacts would represent a significant impact to these communities if not mitigated. Mitigation Measure BIO-6 requires the replacement of the removed trees with a total of 1,246 trees within Project site boundaries. These newly planted trees would be of the same native species as the removed trees at the ratios and locations shown on the final Vegetation Management Plan for the proposed Project. With the implementation of Mitigation Measure BIO-6, impacts to riparian habitats would be less than significant.

CULTURAL RESOURCES

Page 140, Table 19, first row under table header:

Would the project:		Potentially Significant Impact	Less than Significant with Mitigation	Less-than-Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historic resource pursuant to §15064.5?	☐	☒	☐	☒

Page 140, first paragraph under Cultural Landscape Report:

Yarbrough Architectural Resources (Yarbrough) prepared a Cultural Landscape Report (CLR) for the proposed Project in February 2023 and a revised version in September 2023 (Yarbrough, 2023). The CLR is a technical study informing Section 106 of the National Historic Preservation Act (NHPA) and National Environmental Policy Act (NEPA) compliance by the Corps, San Francisco District and the CEQA compliance led by Marin County Parks and Open Space District. The CLR's contents follow Part 1. Guidance from A Guide to Cultural Landscape Reports: Contents, Process, and Techniques (USDOI-NPS, 1998).

Page 141, first and second full paragraphs:

Based on the literature review and site surveys, Yarbrough identified ~~one known architectural resource and a~~ three segments of linear landscape features (Olema Bolinas Road, SR-1, and the Crossover Road). Yarbrough recommended that there was no unified cultural landscape ~~comprised of~~ but three road segments, and their densely vegetated roadside settings~~, and the Wilkins Ranch~~ within the APE. The roads and setting that comprise the cultural landscape features within the APE appeared not to be potential historical resources pursuant to CEQA ~~and~~ nor historic properties ~~subject to~~ following NHPA compliance standards. ~~As a result,~~ Yarbrough recommended the CLR as an analytical format to recommend whether or not the subject resources met the regulatory thresholds for historical significance, namely meeting the criteria of the National and California registers. Specifically, the CLR recommends that the Olema Bolinas Road, Crossover Road, and SR-1 ~~road~~ highway segments are not eligible for the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR) under any criteria ~~A/1 (a resource that is identified with an important event in history) and C/3 (a resource that is identified with important movements in or masters of design and construction) and that the Fairfax Bolinas Road/Crossover Road/Sausalito Road Segment is eligible for the NRHP and CRHR under criteria A/1~~.

Per 36 CFR Section 800.4(b)(1), the lead federal agency is instructed to make a "reasonable and good faith effort" to identify historic properties within an undertaking's APE. As the road segments have not previously been ~~formally~~ evaluated for eligibility for nomination to the NRHP nor the CRHR, the CLR ~~must~~ considers ~~whether or not the~~ that no cultural landscape nor ~~and its~~ character-defining features are present within the APE~~retain sufficient historical integrity to continue to convey significant historical associations~~. Only if NRHP or CRHR-eligible resources were present would the CLR consider sufficient aspects of historical integrity, namely the ability to continue to convey significant historical associations. Olema Bolinas Road, Crossover Road, and SR-1~~, and Fairfax Bolinas Road~~ are lengthy transportation corridors, and ~~their~~ evaluation of their

entirety is well beyond the scope of the current Project APE boundary. However, these three roads segments do not all appear to meet the criteria of CRHR and/or NRHP. Olema Bolinas Road and SR-1 are linear features that pass through the District but are not listed as contributing features of the Districtshown to be significant largely based on the NRHP listing of the roads as features of the District. The Fairfax Bolinas Road has been the subject of important scholarship by Marin County historian Brian K. Crawford but is separate from the Crossover Road. No segment of the Fairfax Bolinas Road falls within the APE. The Fairfax Bolinas Road/Sausalito Crossover Road analysis below recommends this road segment to also be is not CRHR- and NRHP-eligible. A detailed analysis and evaluation of the historical significance of each road segment can be found in the CLR. The CLR concludes that all none of the three segments (Olema Bolinas Road, SR-1, or Crossover Road) within the APE are recommended as "historic properties" under NHPA's establishing legislation 36 CFR § 800.16 nor Section 110 [16 U.S.C. § 470h-2(d)] for SR-1 and per Section 106 (36 CFR § 60.4) for all three segments nor and as "historical resources" per CEQA Guidelines' C PRC Section 5024.1.:

- Olema Bolinas Road Segment is recommended as ineligible for the NRHP and CRHR under criteria A/1 and C/3;
- SR-1 Segment is recommended as ineligible for the NRHP and CRHR under criteria A/1 and C/3;
- Fairfax Bolinas Road/Crossover Road/Sausalito Road Segment is recommended as ineligible for the NRHP and CRHR under criteria A/1;
- All three segments' Period of Significance is recommended as dating from 1856 through 1961 in concurrence to thematic significances determined for the Olema Valley Dairy Ranches Historic District;
- All three segments are recommended to have retained sufficient integrity to convey their historical significance.

Pages 144 and 145, split paragraph:

The Wilkins Ranch, a contributing property of the Olema Valley/Lagunitas Loop Historic District, is identified as within the indirect located northeast of the APE boundary. William Wallace Wilkins moved to California from Massachusetts in 1849 and managed Isaac Morgan's Belvdere Ranch by the early 1850s. Wilkins bought an interest in Morgan's ranch property. Wilkins Ranch operated as a dairy, and by the 1900s, produced 2,250 pounds of butter per month from 64 cows. The Wilkins Ranch benefited from transportation infrastructure that brought dairy products from a district of ranches to the fast-growing market of San Francisco and the greater Bay Area (Livingston, 1995). The dairy remained family owned and operated until the mid-1960s and the ranch was sold in 1970 to Nicholas Charney, who transformed the ranch into "a communal experiment in creative agriculture and living (Livingston, 1995). In 1973 the ranch was sold to the Trust for Public Lands and subsequently transferred to the National Park Service.

Page 145, "Historical Roads" paragraph:

Pioneer dairymen found adequate supplies of feed and water in the Olema Valley, and forests of Douglas fir, oak and other trees, which covered most of the west slope of the valley, supplied their firewood and lumber needs. The roadways between Olema, Bolinas, and Bolinas Bay southward remained undeveloped trails in 1860 (Livingston, 1995). One of these roadways was Olema Bolinas Road and in 1865 Marin County Surveyor Hiram Austin laid out improvements to all for year-round use by horse and oxen drawn cart.

The improvements to the alignment and surface were completed in 1867. In 1878, the road at the Wye at the north end of the Lagoon (current APE) was constructed using wood boards to allow for travel between the east side of the Lagoon further north (GFNMS, 2008). The "Wye" was the intersection between Olema Bolinas Road (running east-west) and ~~Fairfax Bolinas Road (also~~ Crossover Road; running north-south~~)~~, providing the original connection between these transportation corridors. After the completion of a railroad in 1874 to Tomales Bay, access to markets became quicker and more cost-effective. The railroad, improvements to Sausalito Road, and construction of the Fairfax Bolinas Road brought tourists and encouraged the development of a tourist industry centered around Stinson Beach, Bolinas, and up to Tomales Bay.

Page 145, first and second paragraphs under "Tourism and Land Use":

The railroad was a powerful incentive for opening up the Olema Valley area to tourism, and made it easy for San Francisco residents to travel to Marin County for weekends and vacations. Tourists began visiting ~~the~~ western Marin County in the early 1870s, after the inauguration of ferry service from San Francisco to Sausalito (Blackmore, 2019)

In the decades following World War II, much of the land in Marin County remained undeveloped. The completion of the Golden Gate Bridge allowed the San Francisco metropolitan area's growth to spread to eastern Marin County and towards the county's agricultural lands. Rural West Marin County increasingly became a contested space, with those who saw the coastal hamlets, pasturelands, and recovering forests as a landscape for recreation and relaxation pitted against developers and their bankers who saw it as prime for tract homes, tourist motels, and shopping malls. The Marin Conservation League had succeeded in preserving part of the Tomales Bay shore (with the assistance of Dr. Marty Griffin and his colleagues at Audubon Canyon Ranch, who helped preserve Kent Island from marina development and purchase multiple parcels along Tomales Bay to prevent large-scale development), but most of the bay, Point Reyes, Olema Valley, and the Bolinas Lagoon regions remained unprotected and open to development. In 1959, a diverse group of Bay Area citizens and supporting organizations ranging from the Marin Labor Council, the American Forestry Association, and the Wilderness Society, joined forces as the Point Reyes National Seashore Foundation and pushed for passage of supporting legislation to set land aside and to prevent development around the seashore (Blackmore, 2019).

Page 149, discussion under Checklist Question (a):

~~Less-than-Significant~~ No Impact ~~with Mitigation Incorporated~~

Yarbrough prepared a CLR for the proposed Project and identified a cultural landscape consisting of three road segments and~~,~~ their immediate settings~~, and a portion of the Wilkins Ranch~~ within the APE. ~~All~~ None of the three road segments were found to be NRHP- and CRHR- eligible~~,~~; therefore, no ~~the cultural landscape as a whole is recommended as a~~ historic property per NHPA ~~and as a~~ nor historical resource pursuant to CEQA are present within the APE. Under CEQA, if a project may cause a substantial adverse change in the characteristics of a resource that convey its significance or justify its eligibility for inclusion in the CRHR or a local register, either through demolition, destruction, relocation, alteration, or other means, then the project is judged to have a significant impact on the environment [CEQA Guidelines, Section 15064.5(b)]. However,

without the presence of such a resource, no impact is possible. ~~Direct impacts may occur by:~~

- ~~Physically damaging, destroying, or altering all or part of the resource;~~
- ~~Altering characteristics of the surrounding environment that contribute to the resource's significance;~~
- ~~Neglecting the resource to the extent that it deteriorates or is destroyed. Indirect impacts primarily result from the effects of project-induced population growth. Such growth can result in increased construction as well as increased recreational activities that can disturb or destroy cultural resources; or~~
- ~~The incidental discovery of cultural resources without proper notification.~~

~~CEQA provides guidelines for mitigating impacts on significant historical resources in Section 15126.4. For historical architectural resources, maintenance, repair, stabilization, restoration, preservation, conservation, or reconstruction in a manner consistent with the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties generally will constitute mitigation of impacts to a less-than-significant level (Grimmer, 2017).~~ The CLR concludes that the Project presents ~~a less-than-significant impact with mitigation~~ no impact ~~on~~to the ~~cultural landscape as a historical resource, comprised of~~ three road segments~~, their setting, and the Wilkins Ranch~~ within the APE.

Therefore, no historic resource pursuant to §15064.5 is present and the Project poses no Impact to historical resources. ~~With the implementation of Mitigation Measure CUL-1, impacts to historical resources would be less than significant.~~

Page 149, Mitigation Measure CUL-1:

~~Mitigation Measure CUL-1: Historical Resources~~

~~If the SHPO concludes that the three road segments constitute a historic resource, the Project shall develop a Built Environment Treatment Plan (BETP) to resolve adverse effects and reduce the significance of impacts under CEQA to a less-than-significant level. The BETP should propose public interpretation and recordation measures that find acceptance from the Corps, SHPO, and the Marin County Parks and Open Space District in order to jointly address federal and state mandates to mitigate adverse effects and impacts. The BETP shall be attached to a Memorandum of Agreement between the Corps, the California SHPO, and the Advisory Council for Historic Preservation. The same BETP shall be used to reduce adverse CEQA impacts to a less-than-significant impact to historical resources.~~

Page 150, third and fourth paragraphs:

~~Prior to the establishment of the Fairfax Bolinas Road/Crossover Road, the "Sausalito Road" was present within the Project site as early as 1868, if not earlier. It is not known when the Crossover Road subsumed this older road (possibly in the mid-1950s when the current alignment of SR-1 was built) and there is no evidence of the former road, save for the potential alignment itself. It is recommended that during the removal of the Crossover Road, indications of the old "Sausalito Road" are considered and thus an archaeological monitor is present to inspect these activities, as warranted, for evidence of a buried former road surface, roadside features, and/or historic artifacts.~~

With implementation of Mitigation Measures CUL-~~2~~1 and CUL-~~3~~2, impacts to archaeological resources would be less than significant.

Pages 150 and 151, Mitigation Measures CUL-2 and CUL-3:

Mitigation Measure CUL-~~2~~1: Archaeological Resources Monitoring

Prior to Project implementation, a Cultural Resources Monitoring Plan (Plan) will be prepared by a qualified archaeological consultant. The Plan will discuss the monitoring procedures, field methods, communication protocols, and inadvertent discovery actions to be taken in the event archaeological resources are identified during monitoring and/or any Project activities. ~~Periodic spot-check monitoring will occur during the removal/demolition of the Crossover Road and f~~Full-time monitoring will occur during vegetation removal at the location of the Oyster House. All monitoring will be carried out by a qualified archaeologist.

Mitigation Measure CUL-~~3~~2: Archaeological Resources Work Stoppage

Construction crews shall be trained in "basic archaeological identification" and have access to a Cultural Resources Awareness Sheet. The sheet shall photographically depict shell midden and associated indicators of archaeological sites, and clearly outline the procedures in the event of a new archaeological discovery. These procedures include temporary work stoppage (Stop-Work Order) of all ground disturbance, short-term physical protection of artifacts and their context, and immediate advisement of the archaeological team and MCOSD representatives. Any Stop-Work Order would contain a description of the work to be stopped, special instructions or requests for the Contractor, suggestions for efficient mitigation, and a time estimate for the work stoppage. The archaeologist shall examine the findings and assess their significance and offer recommendations for any procedures deemed appropriate to further investigate and/or mitigate adverse impacts to archaeological resources that have been encountered.

Page 151, paragraph under Checklist Question (c):

Section 7050.5 of the California Health and Safety Code states that it is a misdemeanor to knowingly disturb a human burial and Section 5097.99 of the Public Resources Code defines the obtaining or possession of Native American remains or grave goods to be a felony. Buried human remains, by law, must be reported to the County Coroner. The disposition of Native American burials is within the jurisdiction of the Native American Heritage Commission (NAHC), who has the statutory authority to mediate agreements regarding the disposition of Native American remains. In cases in which human remains are known or believed to be likely, consultation with the NAHC is initiated early in the planning process so that consultations with the appropriate Native American most-likely descendant occurs, and agreement regarding the disposition of the remains can be reached. Additionally, MCOSD would directly contact the Federated Indians of Graton Rancheria (FIGR) if human remains are inadvertently discovered. Although the discovery of human remains at the Project site is not expected to occur, Mitigation Measure CUL-~~4~~3 prescribes a procedure for addressing them should any be encountered. With implementation of Mitigation Measure CUL-~~4~~3, impacts to cultural resources would be less than significant.

Page 151, Mitigation Measure CUL-4:

Mitigation Measure CUL-~~4~~3: Discovery of Human Remains

Upon discovery, the Coroner Division of the Marin County Sheriff's Office will be contacted for identification of human remains. The coroner has 2 working days to

examine the remains after being notified. If the remains are Native American, the Coroner must notify the Native American Heritage Commission (NAHC) of the discovery within 24 hours. The NAHC will then identify and contact a Most-Likely Descendant (MLD). The MLD may make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the remains and grave goods. Once proper consultation has occurred, a procedure that may include the preservation, excavation, analysis, and curation of artifacts and/or reburial of those remains and associated artifacts will be formulated and implemented.

If the remains are not Native American, the Coroner will consult with the archaeological research team and the lead agency to develop a procedure for the proper study, documentation, and ultimate disposition of the remains. If a determination can be made as to the likely identity—either as an individual or as a member of a group—of the remains, an attempt should be made to identify and contact any living descendants or representatives of the descendant community. As interested parties, these descendants may make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the remains and grave goods. Final disposition of any human remains or associated funerary objects will be determined in consultation between the MCOSD and FIGR.

NOISE

Page 181, bottom paragraph:

Noise is defined as unwanted sound that annoys or disturbs people and can have an adverse psychological or physiological effect on human health. Sound is produced by the vibration of sound pressure waves in the air. Sound pressure levels are used to measure the intensity of the sound and are described in terms of decibels. The decibel (dB) is based on a logarithmic scale and express the ratio of the sound pressure level being measured to a standard reference level. The starting point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Decibels and other acoustical terms are defined in Table ~~25~~29. The human ear is only capable of hearing sound within a limited frequency range. To better characterize noise levels perceived by a human ear, a decibel scale called A-weighting (dBA) is typically used. On this scale, the low and high frequencies are given less weight than the middle frequencies. Typical A-weighted noise levels at specific distances are shown for different noise sources in Table ~~26~~30.

Page 186, new paragraph following Table 32:

The California Department of Transportation (Caltrans) has developed vibration thresholds based on PPV values to evaluate the potential impact of construction vibration on structures. Construction vibrations that are equal to or exceed the vibration thresholds could result in potential damage to structures. For frequent intermittent vibratory sources during construction (e.g., vibratory compaction equipment), Caltrans recommends a threshold of 0.3 in/sec to prevent potential damage to older residential structures.

Page 186, Table 33:

Table 3. Potential Vibration Damage to Older Residential Buildings during Construction

Equipment	Vibration Threshold	Buffer Distance to Threshold	Distance to Closest Receptor	Threshold Exceeded?
Unit	in/sec	feet	feet	
Vibratory roller	~~0.5~~ 0.3	~~14~~ 20	300	No
Large bulldozer		~~8~~ 11		No
Loaded truck		~~7~~ 10		No
Small bulldozer		1		No

Source: Vibration calculations are available upon request.

TRANSPORTATION

Page 199, Mitigation Measure TRAN-02:

Mitigation Measure TRAN-02: Construction Signage

Construction and detour warning signs shall be placed on SR-1 in advance of construction activities along the roadway for both northbound and southbound traffic. Additional signage, as well as traffic control personnel, may be required at the intersection based on proximity of construction activities to the roadway and whether any temporary modifications of the travel lanes are required. Detour signage shall also be placed at both ends of Horseshoe Hill Road, indicating that this route is not suitable for use as a construction zone bypass.

During Year 2 construction, to the degree that construction materials are required to be transported across the road to and from the staging area, temporary traffic control shall be required. To the extent that the staging area encroaches upon the roadway, traffic control may be required to maintain adequate clearances. Construction warning signage shall be stationed upstream of active construction and staging areas.

REFERENCES

Page 216, between CDFW (2022) and Cook, S.F. (1968):

CO-CAT. (2013). *State of California Sea-Level Rise Guidance Document.* March 2013 update. Retrieved from http://www.opc.ca.gov/webmaster/ftp/pdf/docs/2013_SLR_Guidance_Update_FINAL1.pdf