



# Roy's Redwoods Open Space Preserve

## Roy's Redwoods Restoration Project

### Draft Initial Study/Proposed Mitigated Negative Declaration

### RESPONSE TO COMMENTS

### June 2, 2023

---

The Draft Initial Study/Proposed Mitigated Negative Declaration (IS/MND) for the Roy's Redwoods Open Space Preserve Restoration Project (proposed project) was released for a 30-day public review and comment period on February 6, 2023. The comment period concluded on March 10, 2023. The Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) proposed project was emailed and/or mailed to 158 neighborhood residents, stakeholders, responsible agencies, tribes, individuals who previously expressed interest in receiving such notification. The NOI was posted at the existing public trailheads and was posted on the Marin County Open Space District's (MCOSD) website. A legal notice was published on February 6, 2023 in the Marin Independent Journal, and comments were received through an online comment submission format, direct email to MCOSD, and from State agencies through the State of California Governor's Office of Planning and Research, State Clearinghouse Unit.

MCOSD received 15 comment letters during the public review and comment period. The 16 letters included 56 individual comments. Many comments expressed support or opposition to the project for a variety of reasons.

The remaining comments asked questions about the environmental analysis in the Initial Study associated with plant and wildlife resources, parking and traffic safety, public and agency outreach efforts, invasive species, and fire risk. Some commenters requested more information about the proposed user groups and what kind of monitoring would be used to ensure social trails do not re-establish through the area. One commenter identified a misspelling that occurred numerous times in the document.

Responses to comments are grouped in to Master Responses to provide a consolidated response to questions that pertain to the same or similar issues. Responses to comments not addressed in the master responses are provided individually. The following is a list of the master responses and their topic area:

- Master Response 1: Regulatory Requirements and Permits
- Master Response 2: Northern Spotted Owl and Dusky-footed Woodrat Nest Protection
- Master Response 3: Special Status Plant Protection
- Master Response 4: Parking and Traffic Safety
- Master Response 5: Public and Agency Outreach
- Master Response 6: Trail Users and User Experience
- Master Response 7: Monitoring
- Master Response 8: Support and Oppose the Project

Comments received from agencies, organizations, and individuals are presented in Table 1. Master responses and responses to individual questions are provided below, followed by text changes made to the IS/MND in response to comments, comment letters with individual comments identified and a notation of where the response is addressed in this document. The comment letters are included in this document as Exhibit A. Exhibit B is the Special-status Wildlife Species Table and Exhibit C is the Special-status Plant Species table.

Table 1: Public and Agency Comments on the Initial Study/Proposed Mitigated Negative Declaration for the Roy's Redwoods Restoration Project

Commenter	Support	Opposed	Number of Comments	Master Responses								Other
				1	2	3	4	5	6	7	8	
<b>Agencies</b>												
California Department of Fish and Wildlife, Alex Single, Environmental Scientist	--	--	16	X	X	X						
<b>Organizations</b>												
San Geronimo Planning Group, Eric Morey and Jean Berensmeier	X	--	1								X	
Marin Chapter of California Native Plant Society, Eva Buxton and Carolyn Longstreth	X	--	7			X			X	X	X	
Marin Horse Council, Armory Willis, Robert Eichstaedt, and Linda Novy	X	--	5						X		X	
Marin Conservation League, Robert Miller, Terri Thomas, and Nona Dennis	X	--	3						X		X	
Marin Audubon Society, Barbara Salzman	X	--	6		X					X	X	
French Ranch Home Owners Association, David Bernard	--	--	4				X					
<b>Individuals</b>												
Gerry Toriumi	--	X	2				X		X		X	
Fred Bretz	--	--	1								X	
Carmelita Ellis	--	--	2				X					
Linda Gomez	--	--	2				X				X	
Margaret O'Brien	--	X	1					X			X	
Christopher Boyd	--	X	2								X	
Daniel Ager	--	--	2					X			X	
Caitlin Evans	X	--	1						X		X	
Brad Kelly	--	--	1								X	

## Master Response 1: Regulatory Requirements and Permits

### Comment Summary

The California Department of Fish and Wildlife (CDFW) notes the agency serves as a Trustee and Responsible Agency under CEQA. Several CDFW comments identified regulations or permits required to implement the project including compliance with the California Endangered Species Act (CESA), California Environmental Quality Act (CEQA) Mandatory Findings of Significance, Lake and Streambed Alteration Agreement, and the protection of raptors and nesting birds. Specifically, CDFW advised that an Incidental Take Permit (ITP) would be required if there is a chance a California-listed special status plant or animal species could be impacted as a result of the project. The comments also note that a Lake and Streambed Alteration Agreement is necessary because the project would impact upper Larsen Creek and its tributaries, and because migratory birds and raptors are protected under the Fish and Game Code. CDFW recommended adding Mitigation Measure BIO-3: Lake and Streambed Alteration Notification and other Resource Agency Permits to the IS/MND.

CDFW expressed appreciation that the IS/MND included a list of policies and Best Management Practices in Appendix A. CDFW recommends that the IS/MND list applicable policies and BMPs as mitigation measures to ensure they are enforceable.

*The CDFW letter reiterated the CEQA requirement that information developed in CEQA document must be uploaded to appropriate databases and CDFW requested that MCOSD upload information about special-status species and natural communities into the California Natural Diversity Database (CNDDDB) using the appropriate field form. Lastly, CDFW noted payment of environmental filing fees by the CEQA Lead Agency is necessary.*

**Comment Response – Ecological Permits**

The MCOSD recognizes the role CDFW plays in CEQA as both a Trustee and Responsible Agency, and appreciates the comment letter submitted in response to the IS/MND. The summary of the project description provided in the letter accurately represents the proposed project.

The MCOSD intends to fully comply with the CESA and secure the necessary permits needed to implement and operate the project. As identified on page 33 of the IS/MND under the Permits and Approvals heading, the MCOSD acknowledges the need to acquire a Lake and Streambed Alteration Agreement and all other necessary permits before project implementation. In addition to the CDFW Lake and Streambed Alteration Agreement, the permits identified on page 33 of the Initial Study include a U.S. Army Corps of Engineers Section 404 Clean Water Act permit, a San Francisco Bay Regional Water Quality Control Board Section 401 Water Quality Certification, and permits from Marin County. The commitment to secure all the necessary permits is identified in the Project Description, which means MCOSD has made the acquisition of permits and implementation of and compliance with of all conditions included in the permits as part of the proposed project. The MCOSD will secure and implement conditions in permits which satisfies the intent recommended in the comment; therefore, the addition of Mitigation Measure BIO-3: Lake and Streambed Alteration Notification and other Resource Agency Permits into the IS/MND is not required.

The MCOSD is not intending to secure an Incidental Take Permit for CESA-listed species because analysis of impacts on listed species indicates implementation of the Road and Trail Management Plan Best Management Practices (RTMP BMPs) and the mitigation measures for protection of biological resources proposed in the IS/MND, as modified in response to comments, protects all CESA-listed species and no “take” would occur with implementation and operation of the project. Therefore, no incidental take permit will be required.

The RTMP BMPs and the mitigation measures to protect biological resources also address the means to protect raptors and other nesting birds pursuant to Fish and Game Code section 3503 regarding unlawful take, possession or needless destruction of nests or eggs of any bird, section 3503.5 regarding the take, possession or destruction of any birds of prey or their nests or eggs, and section 3513 regarding unlawful take of any migratory nongame bird. The RTMP BMPs and the mitigation measures also fully address potential impacts to birds protected under the federal Migratory Bird Treaty Act. These measures include RTMP BMPs Special-status Wildlife-3: Seasonal Restrictions During Bird Nesting Season, Special-status Wildlife-8: Worker Awareness Training, Special-status Wildlife-9: Construction Monitoring, and Special-status Wildlife-11: Noise Control. Mitigation Measure BIO-2: Special-status and Nesting Birds Protection clarifies how RTMP BMP Special-status Wildlife-3: Seasonal Restrictions During Bird Nesting Season would be implemented. No changes are necessary in the IS/MND to address the protection of raptors or nesting birds.

### **Comment Response – Policies and BMPs**

The IS/MND includes the applicable RTMP policies and BMPs as part of the project description for individual projects implemented to meet the RTMP goals. In addition to the specific IS/MND pages and measures identified in the CDFW comment regarding implementation of policies and BMPs, the IS/MND lists the applicable policies and BMPs in the Setting section of each of the environmental checklist topic areas, under the sub-heading “Applicable RTMP Policies and BMPs”. The impacts analyses presented for each environmental topic area in the IS/MND included an evaluation on how the applicable RTMP policies and BMPs minimize or avoid potential environmental impacts and how mitigation measures reduce potential impacts to less than significant levels. The MCOSD identified the RTMP BMPs that apply to the proposed project in the IS/MND; therefore, the recommendation to list applicable RTMP policies and BMPs as mitigation measures in the IS/MND is not necessary.

### **Comment Response – Special-status Species Table**

A table listing the special-status wildlife species evaluated for potential to occur in the Roy’s Redwoods Restoration project area is included in this document as Exhibit B.

### **Comment Response – Environmental Data**

The IS/MND describes the redwood-bay forest, shrubland, non-native grassland, and brown-headed rush wetland plant communities. The redwood-bay forest and wetland are considered sensitive plant communities per CDFW’s List of California Terrestrial Natural Communities and the Manual of California Vegetation. The IS/MND describes the northern spotted owl (*Strix occidentalis caurina*) as present in the study area but absent from the project site. The IS/MND also describes California giant salamander (*Dicamptodon ensatus*, California Species of Special Concern) as the only species documented at the project site. The MCOSD will ensure that any required CNDDDB reporting is completed.

### **Comment Response – Environmental Filing Fees**

The Marin County Open Space District intends to pay the applicable CDFW filing fee when filing the Notice of Determination.

## **Master Response 2: Northern Spotted Owl and Dusky-Footed Woodrat Protection**

### ***Comment Summary***

*CDFW and the Marin Audubon Society provided comments about the presence of northern spotted owls (NSO) near the project area. The CDFW states the MND identifies that NSO may nest near the Project (page 102); and notes avoidance of NSO is limited to implementation of the RTMP BMP Special-status Wildlife-4: Avoidance and Protection of NSO (pages 102 and A-15). The comment specifically states limiting work in occupied habitat to the greatest extent possible is not sufficient to protect NSO and the distance at which construction impacts, such as noise, would affect NSO is not quantified in the document.*

*The CDFW comment goes on to state that NSO can be impacted from noise from road use, generators, and other equipment and notes that noise may disrupt the hunting ability of NSO, which primarily use hearing to hunt, within 0.25 miles of the project site. The CDFW concludes that if NSO are nesting within 0.25 miles of the project site, project impacts may substantially reduce the number of NSO, which is considered a Mandatory Finding of*

*Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1). The CDFW includes a recommended mitigation measure, Mitigation Measure BIO-4: Northern Spotted Owl Surveys, to reduce impacts to less-than-significant levels. The proposed mitigation measure states no project activities within 0.25 miles of potential NSO nesting habitat shall occur between February 1 and July 31 unless a qualified biologist conducts NSO surveys following U.S. Fish and Wildlife Service's protocol – Surveying Proposed Management Activities That May Impact Northern Spotted Owls, dated (revised) January 9, 2012. The mitigation language includes a 0.25 mile, no-disturbance buffer zone around the nest until the end of the breeding season, or a qualified biologist determines the nest is no longer active.*

*The Marin Audubon Society noted their major concern with NSO and their habitat particularly in old growth and second growth redwood. The comment raises questions as to the extensive human activity has caused nest abandonment in the project site and the comment suggests measures that could encourage NSO to nest in the project site. The Marin Audubon Society identifies concerns about impacts to dusky-footed woodrat nests and how nests will be protected, avoided, or relocated, since dusky-footed woodrats are food source for NSO.*

**Comment Response – Northern spotted owl**

The IS/MND presented information and based conclusions on information included in the PCI Biological Resources Assessment (BRA) Report (2021) regarding NSO existing habitat and long-term monitoring data on pages 94 and 102. Long-term NSO monitoring conducted by Point Blue Conservation Science avian ecologists indicate that owls nest in the central portion of the old growth forest within the Preserve. Monitoring results indicate Northern spotted owls have not been documented nesting within the project site<sup>1</sup>. The project site is located within the valley floor portion of the Preserve, and not within the central portion of the old growth forest where owl nesting has been documented. Monitoring identified the closest NSO nest area as approximately 1,300 feet to the southwest of the project site, and results indicate owl nesting activity has centered on this location since 2018 with successful nesting in 2020 and 2021. Although NSO have not nested in the project site, Point Blue's monitoring results indicate NSO may use habitat in the project site for roosting and foraging.

As presented in the IS/MND, implementation of the proposed project would include ground-disturbing activities associated with trail decommissioning, trail relocation, rehabilitation of heavily used areas, and floodplain enhancement across the project site within the valley floor portion of the Preserve. The IS/MND concluded construction noise and temporary site disturbance from removal or temporary disturbance of nesting and foraging habitat could impact nesting birds or alter nesting behavior. Therefore, Mitigation Measure BIO-2: Special-status and Nesting Birds Protection, and RTMP BMPs General-8: Noise Control, General-9: Worker Training, Special-status Wildlife-4: Avoidance and Protection of Northern Spotted Owl, and Special-status Wildlife-11: Noise Control were all identified as necessary to reduce potential impacts on NSO and other nesting birds to less than significant levels. Pages 104-105 of the IS/MND specifically discuss how the mitigation measure and the RTMP BMPs would reduce potential construction-period impacts.

---

<sup>1</sup> Project site refers to the area that would experience project-related temporary or permanent effects caused by surface disturbance, vegetation removal, or other alterations of habitat within the project construction area.

Mitigation Measure BIO-2 in the IS/MND identifies the restricted work period between from January 1 to July 31 for species in the Roy's Redwoods Open Space Preserve, which is inclusive of the timeframe identified in the CDFW comment. The mitigation measure presents survey requirements for any ground disturbing activities that may occur within buffer zones specific for each species. The NSO buffer specified in the mitigation measure is 0.25 miles or 1,320 feet, which is the same as that identified in the CDFW recommendation.

The MCOSD would not implement the proposed project until after July 31 as specified in Mitigation Measure BIO-2: Special-status and Nesting Bird Protection to protect nesting NSO. The Point Blue Conservation Science avian ecologist's annual monitoring results from within the Preserve will be used along with consultation with MCOSD biologists to determine if construction can begin before July 31 as specified in the mitigation measure. For northern spotted owl, the following additional guidelines were developed between the Marin County Open Space District, the United States Fish and Wildlife Service, and Point Blue Conservation Science and apply to projects that involve disturbance only with no habitat modification, and would apply to the proposed project:

- No Effect: Action occurs August 1 through January 31
- Not Likely to Adversely Affect: Action occurs July 10 through July 31
- Likely to adversely affect: Action occurs March 1 through July 31

From 1992 to 2004, the United States Fish and Wildlife Service recommended that projects involving disturbance with no habitat modification should not take place between March 1 and August 31. In 2004, these dates were modified to February 1 through July 9. February 1 was selected based on data from coastal California sites showing earlier nesting behavior. The United States Fish and Wildlife Service agreed that the Marin County Open Space District could maintain a March 1 start date. July 9 was selected based on early fledging of young. This date gave fledgling northern spotted owls two-to-four weeks to acclimate to their surroundings. Point Blue Conservation Science recommends the more conservative approach of four weeks post-fledging based on site-specific data. Therefore, Mitigation Measure BIO-2 meets the requirements stated in the comment regarding survey protocol and no additional mitigation or changes to the mitigation language is necessary.

Given the extensive NSO monitoring results presented in the IS/MND, the continued monitoring by Point Blue avian ecologists, the RTMP policies and BMPs, and Mitigation Measure BIO-2, the suggested Mitigation Measure BIO-4 is not be necessary to reduce potential impacts on northern spotted owls to less than significant levels. The IS/MND analysis concluded that potential impacts to NSO would be less than significant with implementation of RTMP BMPs and mitigation measures.

Implementation of the proposed project, including implementation of all applicable RTMP BMPs and Mitigation Measure BIO-2, would not result in substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or the United States Fish and Wildlife Service. The MCOSD included the applicable RTMP BMPs as an integral part of the project description presented in the IS/MND.

As presented in the IS/MND project description and as evaluated in the impact evaluation for NSO, implementation of the proposed project would improve habitat conditions within the project area because it would rehabilitate and restrict visitor access to the existing heavy use areas across the valley floor, which will improve site conditions through decompaction and revegetation efforts. Revegetation would include site appropriate shrubs and perennial herbs that are currently lacking. The species would be planted throughout the valley floor and species were selected based on the location and the anticipated site characteristics following trail closures and floodplain reconnection efforts. Species would vary by sun and shade tolerance and proximity within the Stage Zero wetland channel complex as follows:

- Azalea (*Rhododendron occidentale*)
- Snowberry (*Symphoricarpos albus*)
- Thimbleberry (*Rubus parviflorus*)
- Wood rose (*Rosa gymnocarpa*)
- Brownhead creeping rush (*Juncus phaeocephalus*)
- California grey rush (*Juncus patens*)
- Common rush (*Juncas effusus*)
- Dense sedge (*Carex densa*)
- Douglas iris (*Iris douglasiana*)
- Redwood sorrel (*Oxalis oregano*)
- Santa Barbara sedge (*Carex barbarae*)
- Sword fern (*Polystichum munitum*)
- Wood strawberry (*Fragaria vesca*)

Although NSO foraging and roosting habitat would be disturbed during project implementation, the result of improved site drainage, heavily compacted areas, and improved understory vegetation conditions would increase the available habitat for birds, including NSO.

#### **Comment Response – Dusky-footed Woodrat Nests**

As presented in the IS/MND on page 94, the common dusky-footed woodrats are an important food source for NSO. Although it is not a listed species, local concern has been raised for the common dusky-footed woodrat and its potential presence with the Roy's Redwoods Open Space Preserve and the proposed project site. The PCI Biological Resource Assessment Report identified suitable woodland habitat for dusky-footed woodrat within portions of the Preserve, including habitat in the northern portion of the project site. No woodrat houses were observed at the project site during site visits conducted during development of the PCI Biological Resources Assessment Report in 2021. No habitat and no dusky-footed woodrat houses were identified in or near the areas identified for installation of the boardwalks or other project features across the valley floor because the lack of suitable habitat in those locations. Potentially suitable woodland habitat for the dusky-footed woodrat is present in areas around the northern and southern tributaries at sites where trail relocation and social trail decommissioning would occur for the Roy's Redwood Loop Trail and the Ridge and Mossy Rocks trails. To protect dusky-footed woodrat nests during construction, Mitigation Measure BIO-1: Identify and Protect Dusky-Footed Woodrat Nests would be implemented. The mitigation measure requires preconstruction surveys along the new Roy's Redwoods Loop Trail segments, and along both the Ridge and Mossy Rocks trails. A qualified biologist can also expand the survey area as necessary based on site conditions and field observations.

The mitigation measure describes the steps required if a woodrat nest is present within the proposed work area.

The Marin Audubon Society comment asked for clarification about what would occur if dusky-footed woodrat nest cannot be avoided, to clarify what efforts would be made to avoid nests if they are within the project site, about how nests would be relocated, and whether relocation has been effective elsewhere. CDFW does not have specific protocols for relocation procedures for common dusky-footed woodrats; however, there are projects in San Mateo County and others implemented by the National Park Service that have included relocation procedures for dusky-footed woodrat nests of a related subspecies (*Neotoma fuscipes annectens*). The measures appear to be a successful means of protecting the subspecies, which is a California Species of Special Concern. Although the species that may use habitat in the Roy's Redwoods Open Space Preserve is not a listed species (*Neotoma fuscipes*), the measures commonly used to avoid related subspecies could be used during implementation of the proposed project if a dusky-footed woodrat house(s) cannot be avoided during trail relocation and decommissioning along the Roy's Redwoods Loop, Ridge, and Mossy Rocks trails.

The following conditions will be added to Mitigation Measure BIO-1: Identify and Protect Dusty-Footed Woodrat Nests in the event a dusky-footed woodrat house is found in the work area or adjacent to the work area. The trail or other project component would be relocated away from the woodrat house to avoid impacts, where ever feasible. The following requirements are added to Mitigation Measure BIO-1 to clarify the likely steps necessary to protect dusky-footed woodrat nests. The clarifying language in Mitigation Measure BIO-1 is shown in ~~red~~ ~~strikeout~~ and ~~blue~~ underline text:

**Mitigation Measure BIO-1: Identify and Protect Dusty-Footed Woodrat Nests**

The MCOSD shall survey for dusty-footed woodrat nests and protect or relocate all dusty-footed woodrat nests that cannot be avoided during project implementation. Biological information about the dusky-footed woodrat shall be included in the biological education materials provided for construction personnel prior to the start of construction. A biologist shall survey along the new Roy's Redwoods Loop Trail segments, along both the Ridge and Mossy Rocks trails, and any other location within the project site identified by a qualified biologist within ~~30~~ 7 days prior to construction to determine if nests are present and to identify ones that cannot be avoided. The pre-construction survey shall assess nest activity and inhabitation based on guidance from the National Park Service, such as a cleared entrance or recently placed vegetation on the nest. If none are found, then no additional measures are necessary.

If a woodrat house is identified within a work area, an exclusion zone shall be erected around the existing woodrat houses using flagging or a temporary fence that does not inhibit the natural movements of wildlife, such as steel T-posts and a single strand of yellow rope or similar materials. The exclusion zone would be a 25-foot buffer area surrounding the woodrat house. The work area would be relocated as necessary to avoid removing woodrat houses, ~~even if avoidance is by only a few feet.~~ The orientation of the work area would allow for escape routes to nearby suitable habitat, meaning that the work area would not completely surround the protected woodrat house. ~~If woodrat houses cannot be avoided, CDFW would be contacted for approval to relocate individuals and dismantle the nest. Relocation efforts shall be guided by a qualified biologist.~~

If project features and work areas do not provide sufficient room for a 25-foot exclusion zone around a woodrat house, the MCOSD would erect the exclusion zone to achieve the greatest area of exclusion zone feasible.

If a project feature would directly impact a woodrat nest, the MCOSD would take the following actions:

- 1) Evaluate the feasibility of relocating the project feature and/or work area to avoid the woodrat house by at least 10 feet, and then relocate the project feature and/or work area if feasible.
- 2) Contact CDFW for guidance if the project feature and/or work area cannot be relocated to avoid the woodrat house by at least 10 feet and implement the CDFW guidance, which may include:
  - Flushing and dismantling the woodrat house and then piling the materials in a nearby location outside of the work area for woodrats to use in reconstructing a house.
  - Dismantling a clearly unoccupied house in an area integral for construction during the routine construction period. Woodrat nest occupancy can be determined by whether the structure is maintained. Signs of an active woodrat nest include fresh vegetation, scat, tracks, cleared excavated cavities, signs of teething, and sharp spiked branches. Signs of inactive nests are the absence of maintenance – including cobwebs across entrances, nest deterioration, and the absence of fresh cuttings and scat.
- 3) If the house appears to be occupied, it would not be dismantled until the non-breeding season of October-November, if feasible. If young are encountered during nest dismantling, the dismantling activity would cease and the material replaced back on the house. The house would be left alone and rechecked in 2 to 3 weeks to see if the young are out of the nest or capable of being out on their own, as determined by a qualified biologist. Once the young can fend for themselves, the house dismantling would continue.
- 4) Note: Due to the possibility of exposure to hanta virus (*Orthohantavirus*) known to be carried by woodrats, any dismantling or observations of the woodrat houses would be conducted only in a manner that fully protects the health of crews, equipment operators, or surveyors.<sup>2</sup>

With implementation of the Mitigation Measure BIO-1 and RTMP BMPs Special-status Wildlife – 8: Worker Awareness Training, Special-status Wildlife – 12: Trash Control, Special-status Wildlife – 10: Relocation of Special-status Species, and Special-status Wildlife - 13: Road and Trail Inspections, it is unlikely that the proposed project would result in the direct loss of individual woodrats.

This updated language included in Mitigation Measure BIO-1: Identify and Protect Dusty-Footed Woodrat Nests provides additional information to augment in the IS/MND and does not change the assessment of potentially significant environmental impacts or trigger the need to recirculate the IS/MND.

---

<sup>2</sup> National Park Service. 2015. Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project, March 2023.

## Master Response 3: Special-status Plants

### Comment Summary

CDFW commented that the discussion of special-status plants on page 92 of the IS/MND states that a “number” of special-status plants have the potential to occur on the site but no special-status plants were located during site visits and surveys. CDFW found it unclear if the surveys and site visits were conducted during the appropriate bloom period for all potentially occurring special status plants or whether the surveys followed accepted protocol. The CDFW also states that both annual and perennial plants may have occupied the site since the 2016 and 2020 surveys. The comment lists four plants specifically: Marin checker lily (*Fritillaria lanceolata* var. *tistulis*), Congested headed hayfield tarplant (*Hemizonia congesta* spp. *Congesta*), Tamalpais lessingia (*Lessingia micradenia* var. *micradenia*), and Marin manzanita (*Acrostaphylos virgata*). CDFW notes that if a special-status plant occurs in or near the project site, the impact would be significant. CDFW suggested a new mitigation measure be added to the project that requires pre-project special-status plant surveys that meet the CDFW’s 2018 Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.

The Marin Chapter of the California Native Plant Society also provided comments about plant surveys stating that surveys must be done within five years of project implementation and that surveys should be appropriately timed and occur during the entire flowering season for both special-status and uncommon plant species. CPNS notes that it is unlikely that legally protected species are present in the project area, but two species uncommon in Marin County could be present: Enchanters nightshade (*Circaea alpine* subsp. *pacifica*) and Snow queen (*Synthyris reniformis*). CPNS requests the Enchanter’s nightshade be added to the seed mix for restoration in the alluvial area and that pre-construction botanical surveys be completed at a time that coincides with the best time to detect the presence of important species.

### Comment Response – Special-status Plants

The IS/MND presented information from the PCI Biology Resources Assessment (BRA) Report (2021) associated with special-status plants and their habitat at and near the project site to conclude there were no special-status plants at the project site. The Biological Resources Assessment for the project included botanical and wildlife field surveys conducted by PCI’s senior wildlife biologist and vegetation ecologist. The primary purposes of the Biological Resources Assessment were to characterize the biological communities and habitat conditions, to determine whether or not suitable habitat for special-status species is present, and to identify potential biological constraints. Based on the background literature review, including results from a thorough evaluation of special-status and uncommon plant species by Benson in 2016, a number of special-status plant species were identified as having the potential to occur within the project area. Species with reported observations in close proximity to the project site and/or in habitat types of relevance (e.g., riparian, wetland, grassland, redwood forest) were evaluated and no special-status plants were identified during site surveys completed on July 11, 2017, and April 15, July 2, and November 4, 2020. PCI’s surveys were timed to coincide with the typical peak period for identifying special-status species with potential to occur. Often the best identification window is the blooming period, but for some taxa, identification is easiest during other times, such as fruiting periods. Surveys in April and July were within the blooming period of most of the species listed on Table 2: Special-status Species Evaluated for Potential to Occur in the Roy’s Redwoods Restoration Project Area. The only exceptions are *Arctostaphylos virgata*, an evergreen shrub which would have been visible at least to genus at the time of

all surveys (and none were found), and is typically distinguished on the basis of twig and fruit traits, not flowers; and *Dirca occidentalis*, a deciduous shrub which would have been visible at the time of the surveys. Neither of these species were observed. For those taxa of greatest interest [i.e., those that had potentially suitable habitat present in the study area, and reported occurrences relatively close by (*Hemizonia congesta* ssp. *congesta*, *Leptosiphon acicularis*, *Pleuropogon hooverianus*)], the surveys provided two visits, both of which were within the peak identification period.

Marin manzanita typically occurs on sandstone or granite outcrops in chaparral and coniferous forest. No rock outcrops or shallow soils are present in the study area. No *Arctostaphylos* species were observed in the study area. Tamalpais lessingia typically occurs in thin, gravelly soil of serpentine outcrops or roadcuts within chaparral or grassland. It is only known from four occurrences in the Mt. Tamalpais area. No serpentine or other suitable soil conditions are present in the study area.

Exhibit C lists the species evaluated for potential to occur in the Roy's Redwoods Restoration Project area as requested by one of the commenters.

Although no special-status plants were identified during site surveys and the IS/MND concluded there would be no impact to special-status plant species, the MCOSD's botanist will complete pre-construction surveys for special-status plants to augment the surveys already completed in 2016, 2017, and 2020 to ensure compliance with RTMP BMP Special-status Plants-2: Avoidance and Protection of Special-status Plant Species near Road and Trail Management Projects. In addition, the MCOSD includes the implementation of all applicable RTMP policies and BMPs to create and protect healthy plant populations in the project area. These measures support conclusions presented in the IS/MND for rare plants. The applicable RTMP BMPs for special-status plants included in the proposed project are Special-status Plants-7: Revegetation with Native, Geographically Appropriate Plant Species, and Special-status Plants-8: Worker Awareness Training, Special-status Plants-11: Reuse and Replanting of Native Trees and Shrubs, and Special-status Plants-12: Ripping and Recontouring Roads. The practices are designed to promote a species composition and vegetative structure that integrates with the surrounding natural community, to educate workers about sensitive resources and invasive plants, to inspect roads and trails to ensure they are well maintained to protect surrounding natural resources, to reuse native vegetation and promote native plant habitat, and to provide suitable and stable substrate for recolonization or revegetation by native plant material.

The Marin California Native Plant Society suggested including Enchanter's nightshade in the seed mix for restoration because the species is on site. It is appropriate to add the nightshade in the seed mix, but local seed collection may be necessary if the species is not commercially available. However, the soil seed bank for the proposed project is being protected by an array of measures included in the IS/MND, which are expected to provide for natural re-establishment of this species. Alternatively, MCOSD could salvage and transplant this perennial, rhizomatous species. Snow queen is also a perennial, rhizomatous species and the same options would apply, if it is found on site.

The following is added to the IS/MND in response to the comments about special-status plants on page 26 under the Habitat Restoration heading. The additional language is shown in [blue underline](#) text:

- 5) Protect plantings through use of downed wood, signage, and/or temporary cages that will also protect from herbivory.
- 6) Broadcast seed on the decommissioned Meadow Trail:
  - Blue wildrye (*Elymus glaucus*)
  - California brome (*Bromus carinatus*)
  - California buttercut (*Ranunculus californica*)
  - California oatgrass (*Danthonia californica*)
  - Yarrow (*Achillea millefolium*)
- 7) [Salvage and transplant Enchanter's nightshade within disturbed areas to the extent feasible and use for revegetation within the hydrologic restoration areas.](#)

## **Master Response 4: Parking and Traffic Safety**

### **Comment Summaries**

*Several commenters expressed concern about traffic safety along Nicasio Valley Road with families and children exiting vehicles on the shoulder and crossing the roadway. Comments also include concerns about drivers exceeding the speed limit on the roadway, the number of bikes and large trucks on the roadway, and about the number of accidents that occur at West Nicasio Road. Some commenters want parking eliminated on Nicasio Valley Road with parking provided at the golf club/San Geronimo Commons, and one commenter stated the IS/MND fails to address the combined impact of parking at the preserve and the use of San Geronimo Commons, including the Fire Department.*

### **Comment Response – Traffic Safety**

The IS/MND presented information and based conclusions from the Traffic Study completed by W-Trans in 2022. The Traffic Study analyzed the potential for traffic impacts associated with the proposed project. W-Trans evaluated existing and future traffic along Nicasio Valley Road, safety of the roadway, and the collision history to determine trends and patterns that may indicate a safety issue or an increased safety issue. The W-Trans evaluation used the California Highway Patrol collision rates on the most current five-year period October 1, 2015 through September 30, 2020. The collision data indicated four collisions during the five-year period for the one-mile stretch of Nicasio Valley Road between Dixon Ridge Fire Road and Sir Francis Drake Boulevard. These results indicate the collision rates at Nicasio Valley Road along the Roy's Redwoods Open Space Preserve are less than the statewide average for similar facilities in the same rural environment with rolling hills, and W-Trans concluded implementation of the proposed project would not increase safety concerns along the stretch of Nicasio Valley Road given the existing roadway line of site, roadway speed limit, and the lack of changes to the roadway geometric design.

To augment the collision history information, W-Trans evaluated potential vehicle trip generation resulting from implementation of the proposed project using standard rates published by the Institute of Transportation Engineers and data visitor data collected by the MCOSD during the summer of 2021 to evaluate if traffic changes resulting from implementation of the proposed project could increase traffic safety hazards along Nicasio Valley Road. As presented in the IS/MND, the average number of vehicle trips along Nicasio Valley Road generated by Roy's Redwoods Open Space Preserve visitors is estimated at 74 vehicle trips per day, and the W-Trans Traffic Study concluded eight additional weekday vehicle trips following implementation of the proposed project would not increase traffic safety hazards.

The Traffic Study also evaluated site access and specifically locations where safe U-turns were possible along Nicasio Valley Road and pedestrian safety and the results were used to support the conclusions presented in the IS/MND evaluation. The evaluation included the 2020 installation of no parking signs for

200 feet on the western side of Nicasio Valley Road north of West Nicasio Road. Results indicate there is sufficient sight distance of oncoming traffic and roadway width to accommodate safe U-turns for most vehicles. Larger vehicles would have to travel approximately 3,500 feet north to safely turn around before heading south on Nicasio Valley Road. W-Trans found the site lines on Nicasio Valley Road also allow for pedestrians to safely cross the roadway to access the Preserve and to access their vehicle. Therefore, no traffic calming or roadway crossing safety measures were proposed.

The Marin County Department of Public Works reviews traffic patterns and public safety issues on roadways at or near parks and open space preserves following implementation of all MCOSD projects to evaluate conditions and to provide any recommendations or modifications needed to improve safety. Additional safety measures may include increased signage on Nicasio Valley Road to alert drivers about the Preserve and about the potential for pedestrians crossing the roadway. Monitoring and potential corrective actions are described in the IS/MND on page 33.

### **Comment Response – Parking**

The IS/MND presented information and based conclusions from the Traffic Study completed by W-Trans in 2022, both of which evaluated the potential impacts from increased visitation and public use of the Roy's Redwoods Open Space Preserve following implementation of the project. The Traffic Study provided data on traffic counts obtained on Nicasio Valley Road between April 30 and May 1, 2021, and results indicate the roadway is carrying about 2,300 to 2,900 vehicles per day. The traffic count included all vehicles, including large trucks. W-Trans identified a potential for an additional 8-weekday vehicle trips and 11-weekend vehicle trips following project implementation. Although study results presented in the Traffic Study did not identify a lack of parking to accommodate visitors during their traffic counts and site evaluations, the IS/MND states there may not always be sufficient parking at the Preserve for the additional visitors during peak use periods. The availability of parking is not considered an issue because the site provides sufficient parking, especially when compared to parking at other preserves. No additional parking would be constructed at Roy's Redwoods Open Space Preserve to accommodate peak use periods when parking supply may be low. Visitors to Roy's Redwoods Open Space Preserve would continue to rely on available parking within the public right-of-way along Nicasio Valley Road. This approach is supported by the Marin County Parks Inclusive Access Plan, MCOSD Policy P1<sup>3</sup>.

Besides the addition of one all-access parking stall as part of the proposed project, parking along Nicasio Valley Road would continue as it does under current conditions following implementation of the proposed project; however, the proposed project includes several features that would make public access from Nicasio Valley Road safer for visitors. Currently, Preserve visitors parking along the roadway shoulder must walk from their car to the only formal entryway to the Preserve from Nicasio Valley Road. The proposed project would develop two new designated entryways to allow visitors to exit the roadway shoulder and enter the Preserve more quickly and safely. The existing entryway would also be improved to provide easier access for visitors. An ADA-compliant, also referred to as all-access, parking stall will also be developed to provide safe and inclusive access.

Visitors are not prohibited from parking at the San Geronimo Commons while accessing trails in Roy's Redwoods Open Space Preserve or other preserves in the area. Although Marin County may purchase the property owned by the Trust for Public Land at San Geronimo Commons in the future, the purchase is not imminent and the prospect remains speculative at this point. Therefore, traffic associated with any development at the Commons is not included in the traffic and transportation analysis completed for the proposed project. Nonetheless, Marin County is evaluating purchase of the property for construction of a

---

<sup>3</sup> MCOSD Policy 1P: Marin County Parks will rely primarily on public rights-of-way to provide the parking to serve open space visitors arriving by motorized vehicles. [Link](#): Marin County Parks Inclusive Access Plan Final July 2016.

new Fire Department Headquarters and completing the necessary CEQA Initial Study. The traffic and transportation study completed for the purchase will include an evaluation of traffic and transportation with and without construction and operation of the Fire Department Headquarters and will address the traffic and transportation associated with other past and future projects as part of the cumulative impacts analysis. The Community Development Agency is responsible for the CEQA Initial Study for the San Geronimo Fire Station Project.

## **Master Response 5: Public and Agency Outreach and Coordination with Marin County Fire**

### **Comment Summary**

*Two commenters asked about community and agency outreach efforts noting that they only recently heard about the project and that Marin County Fire has no knowledge of any fire roads being restored as part of the project. One commenter asked that Marin County Parks coordinate with Marin County Fire to restore the fire road above Roy's Redwoods.*

### **Comment Response – Outreach**

The IS/MND presented information regarding project development and project outreach. The specifics around project-specific outreach efforts are presented on pages 34 through 37 of the document. Outreach efforts began in 2017 with the MCOSD hosting public information meetings, workshops, and field walks to inform participants about project concepts to improve public access and restoring hydrologic function of the valley floor through the redwood forest and to collect public input about the project. The MCOSD and the Parks Conservancy hosted subject matter experts' workshops and stakeholder workshops, a Bioblitz, and educational programs and field days between 2017 and 2018. Additional community and public meetings were held and follow up emails were sent to interested members of the public in 2019 to gather input on the project, including a meeting at the San Geronimo Valley Community Center on July 31, 2019 as discussed on page 35 of the IS/MND under the heading Community and Public Meetings. The MCOSD facilitated meetings with the Environmental Roundtable in 2019 and 2022 and the Marin County Parks and Open Space Commission heard presentations about the project from MCOSD staff in September 2019 and again in September 2022.

The MCOSD conducted further project outreach. The MCOSD and the Parks Conservancy presented the project to the San Geronimo Planning Group on May 2022 with a follow-up site visit soon afterwards. MCOSD presented the proposed project to the Marin Conservation League in October 2022. The MCOSD and the Parks Conservancy made presentations about the project to the San Geronimo Valley Stewards and the French Ranch Home Owners Association on November 2020 and December 2020 respectively. The meeting involved discussions regarding the recent increase in visitation, visitor use impacts, and parking. Discussions also included restroom limitations, groundwater and streamflow data collection, construction impacts, and funding. The MCOSD met with local environmental educators on November 2019 to discuss the plans and to collect feedback.

### **Comment Response – Communications with Marin County Fire**

Marin County Park staff met on site at Dickson Fire Road with a representative from the Marin County Fire Department to explore options to improve the sustainability of the access road from Roy's Redwoods to the ridge above Spirit Rock. It was determined that the MCOSD would develop a road log to describe the re-engineering of the road to improve drainage and create a more sustainable road to serve as both a trail and for emergency access. In addition to the road log, the MCOSD would address vegetation treatments along the fire road to better manage vegetation along the road corridor. No timeline has been set for implementation, and implementation is not part of the Roy's Redwood Restoration Project.

## **Master Response 6: Trail Users, Unauthorized Trail Use, and Visitor Experience**

### **Comment Summary**

*A number of commenters asked for clarification about which users can access the trails in the project area and how those users, including mountain bikes and ebikes, would be managed. Commenters expressed concern about potential collisions on the Inclusive Access Trails between children and handicapped individuals and mountain bikes and asked how negative interactions will be mitigated. One commenter asked if mountain bikers should be allowed on trails within the Legacy Zone and whether the use is compatible with the area. Others asked if there will be monitoring for use of mountain bikes and ebikes on the new inclusive access trails, specifically identifying potential bike riders using the new fully accessible trail as an entry point to ride the Roy's Redwoods Loop Trail. An equestrian user suggests signage be added specifying speed limits and clarifying right-of-way. The Marin Horse Council offered to meet with MCOSD on site during construction to discuss design features to create safe access for all users. One comment letter includes a request to provide opportunities to sit while visiting the Preserve, to passively enjoy the redwood grove, and to better immerse themselves in the experience.*

### **Comment Response – Trail Users and Visitor Experience**

The IS/MND clarifies the trail users for all the trails in the proposed project area, and the proposed users shown on Figure 6 in the document. The Roy's Redwoods Open Space Preserve website includes the following regulations regarding bike use. Bikes are permitted on signed fire roads and trails designated for multi-use and hikers/bikers, bike use on trails not designated for bikes is prohibited, the speed limit on the trails designated for bike use is 15 miles per hour, and bikes must slow to 5 miles per hour when passing others and around blind turns. Basic trail etiquette is encouraged, such as all trail users must yield the right-of-way to horses, and cyclists must also yield to pedestrians. Permits are required for commercial use and groups of more than 15 people. Motorized vehicles are prohibited, though individuals with qualified disabilities may operate certain kinds of zero-emission mobility devices, such as batter-operated wheelchairs, on some roads, multiuse trails, and certain other facilities. The use of model airplanes, drones, or other self-propelled crafts is prohibited. Every trail within the proposed project area will be identified with a wayfinding post indicating the allowed designated uses.

Mountain bikes and ebikes would continue to be prohibited on any of the trails in the redwood grove. Bikes would continue to be permitted only the Dickson Fire Road, which is outside the proposed project area. The upgraded and new segments of the Roy's Redwood Loop Trail would be constructed as an Access and Discovery Trail for hiking and equestrian use. Equestrian use through the project area would be limited to this trail segment, which provides access to the rest of the Roy's Redwood Loop Trail beyond the proposed project limits. Access and Discovery trails, including the new trail proposed as part of the project, would accommodate visitors that need Other Power-Driven Mobility Devices (OPDMDs) to access the Preserve, such as electric scooters and motorized wheelchairs. The remaining trails in the project area are designed for hiker only use. Signs and educational materials would be used to convey critical information to Preserve visitors about trail uses, and the MCOSD monitoring program would monitor for user compliance and identify corrective measures needed as presented on IS/MND pages 32 through 33. Existing trails and users within the Roy's Redwoods Open Space Preserve outside the project site are not addressed in the IS/MND.

### **Comment Response – Legacy Management Zone**

The proposed project area includes locations mapped as a Legacy Management Zone in the MCOSD's Vegetation and Biodiversity Management Plan (VBMP), as shown on Figure 24 of the IS/MND. As noted above, the trails located in the project area do not provide access for bike riders, including those trails present within the Legacy Management Zone.

### **Comment Response – Benches and Seating Areas**

Adding the installation of benches and other seating options around the valley floor to provide places where visitors can passively enjoy the redwood grove was an oversight and inadvertently left out of the project description presented in the IS/MND. This oversight will be corrected in the revised documents. Benches and other seating options are needed for the proposed project to be consistent with the MCOSD's Inclusive Access Plan and to meet the proposed project's purpose and need. Benches and seating options would be placed at locations within the valley floor along the Access and Discovery Trail and near trailheads. The clarifying language added to the IS/MND is shown in the section below in the Changes to the Initial Study Section.

The addition of several benches and other seating options to the proposed project would not require recirculation of the Mitigated Negative Declaration before adoption based on the 2023 CEQA Guidelines Section 15073.5. Section 15073.5 requires recirculation for a substantial revision to the proposed project if either of the following two conditions are met:

- 1) A new, avoidable significant effect is identified, *and to reduce that effect to a level of insignificance, mitigation measures or project revisions must be added, or*
- 2) The lead agency finds that the mitigation measures or project revisions originally included in the negative declaration *will not* reduce potentially significant impacts to a level of insignificance, and new mitigation measures or project revisions are required.

The addition of benches and other seating would require implementation of RTMP BMPs and mitigation measures to reduce impacts. No new, avoidable impact and no new mitigation measures are needed to reduce impacts from the installation of new benches or other seating.

## **Master Response 7: Monitoring for Habitat Impacts and Invasive Species**

### ***Comment Summary***

*Several commenters stressed the need for the MCOSD to be vigilant about new invasions of non-native species and request strict compliance with all pertinent management practices, regular monitoring, and rapid response. One commenter expresses doubt that the trees placed to direct visitors away from closed areas will successfully guide visitors out of sensitive habitat and they ask how the MCOSD will ensure visitors remain on new trails and what will the response be if unauthorized trails develop.*

### **Comment Response – Monitoring and Habitat Impacts**

The IS/MND addresses post-project monitoring, maintenance, and remediation activities associated with the project on pages 32 through 33. The MCOSD maintains a monitoring program that includes on-going trail inspections to respond to trail issues including identification of areas that require corrective actions to protect resources, areas where visitors continue to access decommissioned trails or sensitive locations following project implementation, and areas in which trails require corrective action to maintain RTMP

trail standards. The trails at Roy's Redwoods Open Space Preserve that are included in the proposed project would be added into the monitoring program as existing trails are already included in the monitoring program. In addition, the MCOSD would install visitor use cameras for a four-week period in years 1, 2, and 5 after project implementation to capture trends in visitor use as described on page 33 of the IS/MND. If monitoring indicates trail closures are ineffective or does not meet RTMP objectives to reduce environmental impacts or if monitoring identifies user conflicts or bike use on trails in the redwood grove, the MCOSD would implement corrective actions that would range from increased signage and user education, installation of additional access deterrents, increased ranger presence, installation of additional cameras to help law enforcement efforts, additional revegetation efforts, and additional erosion control efforts. The MCOSD is committed to implementing a successful project, and monitoring is a key element to ensure that success.

#### **Comment Response – Monitoring and Response to Invasive Plants**

The PCI Biological Resources Assessment Report (2021) concludes invasive plant species are present within the project site, particularly in disturbed areas along trails and in areas where native vegetation has been cleared or trampled. The IS/MND used the information in the PCI Biological Resources Assessment to evaluate invasive species management and monitoring and the discussion is included on page 113. The IS/MND assessment concludes implementation of the proposed project could introduce or spread invasive plant species along decommissioned trails and along the three proposed new trails and that the invasive plants could spread into adjacent areas. The IS/MND identifies a suite of RTMP Invasive Plant BMPs to address the potential introduction and spread of invasive plant species. All the applicable RTMP Invasive Plant BMPs are incorporated into the proposed project and each BMP has a monitoring requirement that the MCOSD will implement to prevent the spread of invasive plant species and to provide early detection of, and rapid response to infestations that may happen. The following RTMP Invasive Plant BMPs include Invasive Plants-3: Survey and Control of Invasive Plants in Project Footprint, Invasive Plants-4: Limited Soil Disturbance, Invasive Plants-5: Cleaning of Heavy Equipment, Maintenance Tools, and Fire Management Vehicles, Invasive Plants-6: Reducing Potential for Establishment of Invasive Plants on Disturbed Soil Surfaces, Invasive plants-7: Monitor and Control of Invasive Plants in Road and Trail Management Work Areas, and Invasive Plants-10: Monitoring Decommissioned Areas.

### **Master Response 8: Support and Opposition to the Project**

**Comment Summary** *Marin County Open Space District received a number of comments that supported the proposed project and several commenters expressed their opposition to improvements at Roy's Redwoods Open Space Preserve.*

*Common reasons for supporting the proposed project include the following:*

- *Improving the restroom.*
- *Creating a healthy environment and enhanced visitor experience.*
- *Reducing social trails and revegetating the compacted and denuded areas with appropriate native understory.*
- *Support inclusive access.*
- *Appreciation of the schematic designs for public access and public engagement.*

- *Improvement of biological and hydrological resources, and overall improved environmental conditions.*
- *Supports the continued requirements for dogs to be on leashes.*

*Common reasons for opposing the proposed project include the following:*

- *Adding boardwalks will change the site character in a negative way and removes the wilderness experience.*
- *Improvements will encourage mountain bikers to use the trails.*
- *Increased traffic and traffic hazards will result on Nicasio Valley Road.*
- *Encouraging people to visit an ecologically sensitive area is unsound thinking.*
- *Lack of community engagement during project development.*

### **Comment Response**

The MCOSD appreciates receiving all the comments provided both in support of and opposed to the proposed project.

## **Other Comments**

### ***Comment Summary***

*A commenter asked if the claim that Larsen Creek supports coho has been substantiated.*

### **Comment Response**

The fisheries and aquatics section of the IS/MND is informed by analysis and conclusions presented in the 2021 PCI Biological Resources Assessment Report. PCI describes Larsen Creek as a tributary to San Geronimo Creek, which flows into Lagunitas Creek. Lagunitas Creek supports critical habitat for coho salmon (*Oncorhynchus kisutch*), steelhead (*Oncorhynchus mykiss irideus*), and California freshwater shrimp (*Syncaris pacifica*). The lower reaches of Larsen Creek, downstream of the Roy's Redwoods Open Space Preserve through the former San Geronimo Golf Course property, are used by coho salmon and steelhead for spawning and rearing, and the habitat conditions in the lower reaches are moderately supportive. Salmonids cannot access Upper Larsen Creek within Roy's Redwoods due to several passage barriers, namely a 9-foot-high bedrock ledge, piped channel reach, two on-stream ponds, and a culvert. The purpose and need of the proposed project is not to create coho habitat in Upper Larsen Creek.

### ***Comment Summary***

*A commenter noted that it is unclear whether or not the project addresses the increased promotion of vegetation in the valley and the increased fire risk to homes on either side of the Moonhill Ridge above Spirit Rock.*

### **Comment Response**

The IS/MND includes an evaluation whether implementation of the proposed project would increase fire risk. Conclusions presented in the IS/MND state the proposed project would not exacerbate wildfire risk in the area. The primary analysis is presented beginning on page 185 in the IS/MND. The proposed project would decommission social trails, upgrade some existing trails to allow inclusive access, relocate trails to more sustainable locations, rehabilitate heavily impacted areas in the alluvial valley, improve hydrologic conditions along Upper Larsen Creek, and improve roadside access to the Preserve. As stated in the

IS/MND, improving hydrologic conditions across the alluvial valley floor through implementation of the Stage Zero channel-wetland complex would provide increased surface water in the alluvial valley longer into the dry season. Expanding the wetland-channel complex through the valley and maintaining soil moisture would likely reduce fire risk in the alluvial valley, even with the proposed increases in vegetative cover. Reducing the amount of invasive species also can reduce the risk of wildfire as discussed in the biological resources section of the IS/MND page 113.

**Comment Summary**

*The Marin Horse Council asked if Roy's Redwoods Loop Trail will be closed during construction.*

**Comment Response**

The Roy's Redwoods Loop Trail would be open for use by Preserve visitors outside the project area during project implementation. The reconstructed segments of the Roy's Redwoods Loop Trail would be closed during project implementation as necessary to keep visitors safe. On-site signage and the MCOSD website would be used to notify visitors which trails are available to use during the construction period.

**Comment Summary**

*The Marin Audubon Society commented that the IS/MND reports the project is designed to have no tree removal, to minimize pruning, and to minimize impacts to the root zone. They question why a tree replacement plan would be developed if no trees are removed.*

**Comment Response**

The proposed project was designed to minimize pruning and to avoid tree removal. The addition of developing of a tree replacement plan is included in the Mitigation Measure BIO-3: Native Tree Protection in the event a tree must be removed or if a tree is damaged during project implementation. If a tree cannot be avoided and must be removed, a tree replacement plan would be developed and implemented as part of the proposed project to ensure compliance with the tree replacement ratios in the mitigation measure.

**Comment Summary**

*The Marin Audubon Society acknowledged the many beneficial outcomes of the proposed project. The comment letter also stated construction of the trails and boardwalks would result in loss of understory vegetation, soil disturbance, and compaction. The comment notes the area understory vegetation to be restored should be at least equal or exceed the area of understory vegetation that has been or will be destroyed.*

**Comment Response**

The proposed trails and boardwalks and the proposed restoration efforts across the redwood valley floor have been designed to improve overall site conditions by decommissioning and revegetating social trails and improving the existing network trails to provide visitor access along a sustainable trail network. The loss of vegetation from development of new trails and the areas proposed for revegetation are addressed in the IS/MND on page 89. The evaluation presented in the document concludes the amount of vegetation impacted during construction is less than the overall area of restoration. In other words, implementation of the proposed project would result in over 1.77 acres of restored areas throughout the project site and loss of 1.64 acres of existing vegetation.

### **Comment Summary**

*A commenter identified the misspelling of “dusky-footed woodrat” in the document. Dusky-footed woodrat was misspelled dusty-footed woodrat.*

#### **Comment Response**

The MCOSD appreciates the commenter pointing out the misspellings. The misspelling of dusky-footed woodrat not change the meaning or the understanding of the impacts analysis presented in the IS/MND; therefore, the comment is noted but no changes to the IS/MND are proposed.

### **Changes to the Initial Study**

The MCOSD has considered all comments received during the 30-day public review period for the proposed project. This document presents summaries of the comments received and the MCOSD’s responses to comments. The MCOSD has made minor edits to the Initial Study to clarify the narrative and they do not result in substantial revision as defined in CEQA Guidelines Section 15073.5 that would require recirculation of the document. Specifically, no new, avoidable significant impacts, mitigation measures, or project revisions were added to reduce the effect to less than significant levels. The edits pertain primarily to the addition of benches and other seating to the project description and clarifying language to Mitigation Measure BIO-1: Identify and Protect Dusty-Footed Woodrat Nests to address comments and questions raised by reviewers.

The following changes have been made to the Initial Study to clarify mitigation language and to add text that was inadvertently omitted. Deleted text is show in ~~red strikethrough~~ font and text additions are shown in blue underline.

### **SUMMARY OF THE PROPOSED PROJECT**

Page 10, inserted text under the Visitor Education heading:

#### **Visitor Education and User Experience**

- Install new fencing and visitor information signage to notify visitors of closed trails and discourage development of new social trails.
- Construct a Nature Exploration Area and Scramble.
- Provide visitor interpretive services.
- Install benches and other seating options to provide visitors with an immersive redwood grove experience.

### **PROJECT DESCRIPTION**

Page 19, inserted text under the Designated Trails and Inclusive Access heading:

#### **Designated Trails and Inclusive Access**

The proposed project would reduce the number, extent, and use of trails by creating a sustainable designated trail network through the alluvial valley. The project would result in inclusive access to an immersive experience of the old growth redwood forest. The proposed project would increase the equitability of access to the Roy’s Redwoods Open Space Preserve with construction of an Access and Discovery Trail as specifically identified in the Marin County IAP<sup>4</sup>. The Access and Discovery Trail system

---

<sup>4</sup> The IAP is based on the principles of Universal Design to accommodate the needs of a range of users, which includes specification for trail surface, width, slopes, resting intervals, passing spaces, signage, and other amenities.

is an experience-based network of trails that provides varied and immersive user experiences broadly representative of the array of outdoor settings available within the MCOSSD preserves. These trails within an old growth redwood grove would meet or exceed the technical standards for accessible recreational trails and incorporate the principles of Universal Design and Standard for Accessible Design contained in the Architectural Barriers Act *Accessibility Guidelines for Outdoor Developed Areas*<sup>5</sup> to accommodate the needs of users. [Benches and other seating options would also be integrated into the design through the redwood grove to provide enhanced user experience for visitors.](#) Chapter 6 in the IAP describes the trail [and seating options of the](#) design characteristics needed to provide inclusive access. ~~which include the following~~ [The IAP design criteria for Access and Discovery trails include:](#) firm trail surfaces would be maintained with minimal vertical obstacles, Access and Discovery trails would be cleared of overhanging vegetation to 60 inches, trail slopes would be no greater than needed to provide adequate trail drainage and alternative drainage means would be used where required to meet accessibility standards, and resting intervals and passing spaces would be provided to allow trail users to rest after vertical changes in elevation or to allow simultaneous passage for all trail users. [Chapter 6 in the IAP also describes the technical standards for seating design. It requires that seating be located to avoid impacts to sensitive resource areas and designed to maintain the character of open space preserves. The technical standards require use of informal seating through the use of boulders, logs, or other native material at sites except for sites at trailheads.](#)

Page 20, inserted text under the Designated Trails and Inclusive Access heading:

#### **Fairy Ring Trail**

The proposed new Fairy Ring Trail would connect the new segment of the Roy's Redwoods Loop Trail to the "Fairy Ring" location and to the Nature Exploration Area as shown on Figure 5. This proposed trail would be constructed to an Access and Discovery Trail standard as shown on Figure 6. Pedestrians could use the Fairy Ring Trail; however, equestrians would not be allowed on this trail.

#### **Benches and Other Seating**

[Benches and other seating options would be provided at resting intervals and destinations along the Access and Discovery Trail including the Roy's Redwood Loop Trail upgrade segment, the Fairy Ring Trail, and at a location near the Scramble and Nature Exploration Area. Seating would conform to the technical standards in Chapter 6 of the Inclusive Access Plan and may include installation of a bench or use of boulders, logs, or other native materials.](#)

Page 26, inserted text under the Habitat Restoration and Trail Decommissioning, Habitat Restoration section:

- 1) Protect plantings through use of downed wood, signage, and/or temporary cages that will also protect from herbivory.
- 2) Broadcast seed the decommissioned Meadow Trail:
  - Blue wildrye (*Elymus glaucus*)
  - California brome (*Bromus carinatus*)

---

<sup>5</sup> 36 CFR Part 1191, published in the Federal Register on September 26, 2013, and supplemented with guidance documents produced by the US Forest Service and California Department of Parks and Recreation.

- California buttercup (*Ranunculus californica*)
  - California oatgrass (*Danthonia californica*)
  - Yarrow (*Achillea millefolium*)
- 3) [Salvage and transplant Enchanter's nightshade within disturbed areas to the extent feasible and use for revegetation within the hydrologic restoration areas.](#)

## Summary of the CEQA Analysis

Page 69, inserted text under the Proposed Mitigation Measures heading:

### Dusty-footed Woodrat Nest Protection

The RTMP does not include BMPs regarding protection of dusty-footed woodrat nests. Dusty-footed woodrats provide an important food source for northern spotted owls, and loss of existing woodrat nests during implementation of the proposed project would remove their food source.

### Mitigation Measure BIO-1: Identify and Protect Dusty-Footed Woodrat Nests

The MCOSD shall survey for dusty-footed woodrat nests and protect or relocate all dusty-footed woodrat nests that cannot be avoided during project implementation. [Biological information about the dusky-footed woodrat shall be included in the biological education materials provided for construction personnel prior to the start of construction.](#) A biologist shall survey along the new Roy's Redwoods Loop Trail segments, along both the Ridge and Mossy Rocks trails, and any other location within the project site identified by a qualified biologist within ~~30~~ 7 days prior to construction to determine if nests are present and to identify ones that cannot be avoided. [The pre-construction survey shall assess nest activity and inhabitation based on guidance from the National Park Service, such as a cleared entrance or recently placed vegetation on the nest.](#) If none are found, then no additional measures are necessary.

If a woodrat house is identified within a work area, an exclusion zone shall be erected around the existing woodrat houses using flagging or a temporary fence that does not inhibit the natural movements of wildlife, such as steel T-posts and a single strand of yellow rope or similar materials. [The exclusion zone would be a 25-foot buffer area surrounding the woodrat house.](#) The work area would be relocated as necessary to avoid removing woodrat houses, ~~even if avoidance is by only a few feet.~~ The orientation of the work area would allow for escape routes to nearby suitable habitat, meaning that the work area would not completely surround the protected woodrat house. ~~If woodrat houses cannot be avoided, CDFW would be contacted for approval to relocate individuals and dismantle the nest. Relocation efforts shall be guided by a qualified biologist.~~ [If project features and work areas do not provide sufficient room for a 25-foot exclusion zone around a woodrat house, the MCOSD would erect the exclusion zone to achieve the greatest area of exclusion zone feasible.](#)

[If project features and work areas do not provide sufficient room for a 25-foot exclusion zone around a woodrat house, the MCOSD would erect the exclusion zone to achieve the greatest area of exclusion zone feasible.](#)

[If a project feature would directly impact a woodrat nest, the MCOSD would take the following actions:](#)

- 1) [Evaluate the feasibility of relocating the project feature and/or work area to avoid the woodrat house by at least 10 feet, and then relocate the project feature and/or work area if feasible.](#)
- 2) [Contact CDFW for guidance if the project feature and/or work area cannot be relocated to avoid the woodrat house by at least 10 feet and implement the CDFW guidance, which may include:](#)
  - [Flushing and dismantling the woodrat house and then piling the materials in a nearby location outside of the work area for woodrats to use in reconstructing a house.](#)
  - [Dismantling a clearly unoccupied house in an area integral for construction during the routine construction period. Woodrat nest occupancy can be determined by whether the structure is maintained. Signs of an active woodrat nest include fresh vegetation, scat, tracks, cleared excavated cavities, signs of teething, and sharp spiked branches. Signs of inactive nests are the absence of maintenance – including cobwebs across entrances, nest deterioration, and the absence of fresh cuttings and scat.](#)
- 3) [If the house appears to be occupied, it would not be dismantled until the non-breeding season of October-November, if feasible. If young are encountered during nest dismantling, the dismantling activity would cease and the material replaced back on the house. The house would be left alone and rechecked in 2 to 3 weeks to see if the young are out of the nest or capable of being out on their own, as determined by a qualified biologist. Once the young can fend for themselves, the house dismantling would continue.](#)
- 4) [Note: Due to the possibility of exposure to hanta virus \(\*Orthohantavirus\*\) known to be carried by woodrats, any dismantling or observations of the woodrat houses would be conducted only in a manner that fully protects the health of crews, equipment operators, or surveyors.](#)<sup>6</sup>

[With implementation of the Mitigation Measure BIO-1 and RTMP BMPs Special-status Wildlife – 8: Worker Awareness Training, Special-status Wildlife – 12: Trash Control, Special-status Wildlife – 10: Relocation of Special-status Species, and Special-status Wildlife - 13: Road and Trail Inspections, it is unlikely that the proposed project would result in the direct loss of individual woodrats.](#)

### **Special-status Wildlife**

Page 102, inserted text under the Northern Spotted Owl heading:

Although not a listed species, local concern has been raised for the common dusky-footed woodrat because it is a primary prey species for the Northern spotted owl. Dusky-footed woodrats provide an important food source for northern spotted owls, and loss of existing woodrat nests during implementation of the proposed project would remove a potential food source. Suitable woodland habitat for dusky-footed woodrat is present within portions of the Roy's Redwoods Open Space Preserve although no woodrat nests were observed during surveys conducted for the PCI Biology Report. However, it is possible that vegetation removal associated with implementation of the proposed project could result in the loss of a woodrat nest. The loss of or disturbance to dusky-footed woodrat or its nest would be a

---

<sup>6</sup> [National Park Service. 2015. Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project, March 2023.](#)

potentially significant impact because the loss of woodrats could indirectly affect Northern spotted owl. The RTMP BMPs do not address protection of dusty-footed wood rat nests. Therefore, Mitigation Measure BIO-1: Protect Dusty-footed Woodrat Nests, is included to augment the measures specified in the RTMP and require pre-construction surveys for dusty-footed wood rats' nests along new trail routes and other key potentially affected by construction. The additional protection specifies the need to protect or relocate nests located within the project site.

**Mitigation Measure BIO-1: Identify and Protect Dusty-Footed Woodrat Nests**

The MCOSD shall survey for dusty-footed woodrat nests and protect or relocate all dusty-footed woodrat nests that cannot be avoided during project implementation. [Biological information about the dusky-footed woodrat shall be included in the biological education materials provided for construction personnel prior to the start of construction.](#) A biologist shall survey along the new Roy's Redwoods Loop Trail segments, along both the Ridge and Mossy Rocks trails, and any other location within the project site identified by a qualified biologist within ~~30~~ 7 days prior to construction to determine if nests are present and to identify ones that cannot be avoided. [The pre-construction survey shall assess nest activity and inhabitation based on guidance from the National Park Service, such as a cleared entrance or recently placed vegetation on the nest.](#) If none are found, then no additional measures are necessary.

If a woodrat house is identified within a work area, an exclusion zone shall be erected around the existing woodrat houses using flagging or a temporary fence that does not inhibit the natural movements of wildlife, such as steel T-posts and a single strand of yellow rope or similar materials. [The exclusion zone would be a 25-foot buffer area surrounding the woodrat house.](#) The work area would be relocated as necessary to avoid removing woodrat houses, ~~even if avoidance is by only a few feet.~~ The orientation of the work area would allow for escape routes to nearby suitable habitat, meaning that the work area would not completely surround the protected woodrat house. ~~If woodrat houses cannot be avoided, CDFW would be contacted for approval to relocate individuals and dismantle the nest. Relocation efforts shall be guided by a qualified biologist.~~ [If project features and work areas do not provide sufficient room for a 25-foot exclusion zone around a woodrat house, the MCOSD would erect the exclusion zone to achieve the greatest area of exclusion zone feasible.](#)

[If project features and work areas do not provide sufficient room for a 25-foot exclusion zone around a woodrat house, the MCOSD would erect the exclusion zone to achieve the greatest area of exclusion zone feasible.](#)

[If a project feature would directly impact a woodrat nest, the MCOSD would take the following actions:](#)

- 1) [Evaluate the feasibility of relocating the project feature and/or work area to avoid the woodrat house by at least 10 feet, and then relocate the project feature and/or work area if feasible.](#)
- 2) [Contact CDFW for guidance if the project feature and/or work area cannot be relocated to avoid the woodrat house by at least 10 feet and implement the CDFW guidance, which may include:](#)

- [Flushing and dismantling the woodrat house and then piling the materials in a nearby location outside of the work area for woodrats to use in reconstructing a house.](#)
  - [Dismantling a clearly unoccupied house in an area integral for construction during the routine construction period. Woodrat nest occupancy can be determined by whether the structure is maintained. Signs of an active woodrat nest include fresh vegetation, scat, tracks, cleared excavated cavities, signs of teething, and sharp spiked branches. Signs of inactive nests are the absence of maintenance – including cobwebs across entrances, nest deterioration, and the absence of fresh cuttings and scat.](#)
- 3) [If the house appears to be occupied, it would not be dismantled until the non-breeding season of October-November. If young are encountered during nest dismantling, the dismantling activity would cease and the material replaced back on the house. The house would be left alone and rechecked in 2 to 3 weeks to see if the young are out of the nest or capable of being out on their own, as determined by a qualified biologist. Once the young can fend for themselves, the house dismantling would continue.](#)
  - 4) [Note: Due to the possibility of exposure to hanta virus \(\*Orthohantavirus\*\) known to be carried by woodrats, any dismantling or observations of the woodrat houses would be conducted only in a manner that fully protects the health of crews, equipment operators, or surveyors.<sup>7</sup>](#)

[With implementation of the Mitigation Measure BIO-1 and RTMP BMPs Special-status Wildlife – 8: Worker Awareness Training, Special-status Wildlife – 12: Trash Control, Special-status Wildlife – 10: Relocation of Special-status Species, and Special-status Wildlife - 13: Road and Trail Inspections, it is unlikely that the proposed project would result in the direct loss of individual woodrats.](#)

## **Notice of Determination**

The MCOSD has considered all comments received during the 30-day public review period for the proposed project. This document presents summaries of the comments received and the MCOSD’s responses to comments. The MCOSD has made minor edits to the Initial Study to clarify the narrative and they do not result in substantial revisions as defined in CEQA Guidelines Section 15073.5 that would require recirculation of the document. Specifically, no new, avoidable significant impacts, mitigation measures, or project revisions were added to reduce the effect to less than significant levels. The edits pertain primarily to the addition of benches and other seating to the project description and clarifying language to Mitigation Measure BIO-1: Identify and Protect Dusty-Footed Woodrat Nests to address comments and questions raised by reviewers.

Based on the conclusions included in the Initial Study, the comments received during the public review period, and responses to those comments, the MCOSD will adopt the proposed Mitigated Negative Declaration as it finds, on the basis of the whole record, that there is no substantial evidence that the project will have a significant effect on the environment and the Mitigated Negative Declaration reflects the MCOSD’s independent judgement and

---

<sup>7</sup> [National Park Service. 2015. Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project, March 2023.](#)

analysis. A Notice of Determination will be filed consistent with the CEQA Guidelines Section 15075, Notice of Determination on a project for which a proposed Negative or Mitigated Negative Declaration has been Approved.

## **References**

Marin County Parks. 2016. Final Inclusive Access Plan. July.

National Park Service. 2015. Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project, March 2023

Prunuske Chatham, Inc. 2021. Roy's Redwoods Open Space Preserve Biological Resources Assessment Report. October 2021.

Exhibit A: Comment Letters



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Bay Delta Region  
2825 Cordelia Road, Suite 100  
Fairfield, CA 94534  
(707) 428-2002  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



March 7, 2023

Jon Campo, Principal Planner  
Marin County Open Space District  
3501 Civic Center Drive, Suite 260  
San Rafael, CA 94903  
[JCampo@MarinCounty.org](mailto:JCampo@MarinCounty.org)

Subject: Roy's Redwoods Restoration Project, Mitigated Negative Declaration,  
SCH No. 2023020117, Marin County

Dear Mr. Campo:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from the Marin County Open Space District (District) for the Roy's Redwoods Restoration Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

CDFW is submitting comments on the MND to inform the District, as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

**CDFW ROLE**

1

CDFW is a **Trustee Agency** with responsibility under CEQA pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA) or Native Plant Protection Act, the Lake and Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

Master Response 1

**PROJECT DESCRIPTION SUMMARY**

2

**Description:** The Project's purpose is to implement the District's Road and Trail Management Plan and Marin County Parks Inclusive Access Plan and reduce environmental impacts on sensitive resources by reducing sedimentation and erosion. The Project would upgrade, realign, and decommission portions of existing trails. The Project is also intended to improve hydrologic conditions and increase groundwater infiltration and storage through habitat restoration activities designed to create a wetland/channel complex in Upper Larsen Creek.

Approximately 6,170 linear feet of existing trail would be upgraded, 1,400 linear feet of trail realigned, and 6,465 linear feet of trail decommissioned. Eight boardwalks would be built in areas hydrologically connected to Upper Larsen Creek; one steel footbridge and two pedestrian log crossings would be placed crossing Upper Larsen Creek.

Master Response 1

The Project would restore degraded channel reaches by repairing headcuts and constructing rock and log grade control structures, partially fill an incised channel of Upper Larsen Creek, relocate logs on the forest floor to slow overland water flow, and install approximately 10 wood structures in Upper Larsen Creek.

The Project would restore approximately 77,170 square feet (1.77 acres) of land impacted by heavy visitor use through decompaction of soil, duff and woody debris replacement, and revegetation with native plants. It would also include parking and site access improvements, relocating a portable toilet and trash cans, and installing signage.

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Jon Campo  
 Marin County Open Space District  
 March 7, 2023  
 Page 2

**Location:** Roy's Redwoods Open Space Preserve, approximately 2,250 feet north of the intersection of Sir Francis Drake Boulevard and Nicasio Valley Road in Marin County, with an approximate Latitude 38.020856 °N, Longitude -122.660173 °W.

## REGULATORY REQUIREMENTS

### California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA either during construction or over the life of the Project. **The Project has the potential to impact northern spotted owl (NSO, *Strix occidentalis caurina*), a CESA listed as threatened species, as further described below.** Issuance of an ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain an ITP.

Master  
 Response 1

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with CESA.

### Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to LSA Notification requirements. **As described in the MND (pages 27 to 30), the Project would impact the main stem, western, northern, and southern tributaries of Upper Larson Creek, and areas hydrologically connected to Upper Larson Creek; therefore, an LSA Notification pursuant to Fish and Game Code section 1602 would be required, as further described below.** CDFW would consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement until it has complied with CEQA as a Responsible Agency.

Master  
 Response 1

### Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds of prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

Master  
 Response 1

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the District in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the document. Based on the Project's avoidance of significant impacts on biological resources with

Jon Campo  
 Marin County Open Space District  
 March 7, 2023  
 Page 3

implementation of mitigation measures, including those CDFW recommends below and in **Attachment 1**, CDFW concludes that an MND is appropriate for the Project.

## I. Project Description and Related Impact Shortcoming

**Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or the U.S. Fish and Wildlife Service (USFWS)?**

And,

**Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**Comment 1:** Permits for Stream and Wetland Impacts, Pages 27 to 30 and Page 33

**Issue:** The MND states that the Project would impact Upper Larson Creek (pages 27 to 30) and therefore, requires an LSA Notification pursuant to Fish and Game Code section 1600 et seq. (page 33). However, the MND does not include a mitigation measure requiring an LSA Notification and compliance with the LSA Agreement, if issued, or permits from the Regional Water Quality Control Board (RWQCB) and U.S. Army Corps of Engineers (USACE) for impacts to streams or wetlands.

**Specific impacts, why they may occur, and evidence impact would be potentially significant:** The Project would result in impacts to stream habitat and to habitats hydrologically connected to Upper Larsen Creek including wetland habitat. CDFW appreciates the restoration components of the Project; however, impacts to these sensitive habitats would still occur. Riparian habitat is of critical importance to protecting and conserving the biotic and abiotic integrity of an entire watershed. When riparian habitat is substantially altered, riparian functions become impaired, thereby likely substantially adversely impacting aquatic and terrestrial species. More than 90 percent of California's historic wetlands have been lost to development and other human activity. Wetlands are a critical natural resource that protect and improve water quality and provide habitat for fish and wildlife. Absent the above permits which include measures to avoid and minimize impacts to streams, hydrologically connected habitat, wetlands, and associated species, impacts to Upper Larson Creek, hydrologically connected habitat, and wetlands would be potentially significant.

**Recommended Mitigation Measure:** To reduce potential impacts to riparian habitat, other hydrologically connected habitat, and wetlands to less-than-significant, and comply with Fish and Game Code section 1600 et seq. and the Clean Water Act, CDFW recommends including the mitigation measure below.

*Lake and Streambed Alteration Notification and other Resource Agency Permits.* The Project shall notify CDFW pursuant to Fish and Game Code section 1600 et seq. using the Environmental Permit Information Management System (see: <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>) for Project activities affecting lakes or streams, associated riparian or otherwise hydrologically connected habitat, and any connected wetlands, and shall comply with the LSA Agreement, if issued. Projects shall also obtain and comply with applicable permits from the RWQCB and USACE pursuant to the Clean Water Act and Porter-Cologne Water Quality Control Act.

## II. Environmental Setting and Related Impact Shortcoming

**MANDATORY FINDINGS OF SIGNIFICANCE** Does the Project have the potential to threaten to eliminate a plant or animal community, or substantially reduce the number or restrict range of a rare or endangered plant or animal?

6

Master  
 Response 1

Jon Campo  
 Marin County Open Space District  
 March 7, 2023  
 Page 4

**Comment 2:** NSO, listed as threatened under CESA and the federal Endangered Species Act (ESA), Pages 102 and A-15.

**Issue:** The MND identifies that NSO may nest near the Project (page 102); however, avoidance of NSO is limited to implementation of the Best Management Practice (BMP) Special-Status Wildlife-4: Avoidance and Protection of NSO (pages 102 and A-15). This BMP consists of several elements including a requirement for surveys within potential habitat and limiting work in occupied habitat during the NSO breeding and nesting season “to the greatest extent possible” (page A-15). Limiting work in occupied habitat to the greatest extent possible is not sufficient to protect NSO. In the discussion of impacts to NSO (page 102) and the text of the BMP (page A-15), the distance at which construction impacts such as noise would affect NSO is not quantified. Further, the BMP is not an enforceable mitigation measure.

**Specific impacts, why they may occur, and evidence impact would be potentially significant:** Noise from road use, generators, and other equipment may disrupt the hunting ability of NSO, which primarily use hearing to hunt, within 0.25 miles of the Project site. Also, exposure to vehicle noise has been shown to increase stress hormone levels in NSO, which was particularly evident in males during times when they were exclusively responsible for feeding their mates and nestlings (Hayward et al. 2011).

7 NSO populations have declined significantly in California primarily as a result of destruction of forest habitat from logging, development, and wildfire (CDFW 2016). As a habitat specialist, NSO are primarily threatened by further loss, fragmentation, and degradation of their forest habitats, which is further complicated by their low reproductive rate and limited ability to disperse (Shuford and Gardali 2008). A more recent but also serious threat is invasion of their range by barred owls (*Strix varia*) which can outcompete and potentially kill NSO and hybridize with them (CDFW 2016). Master Response 2

Consistent with CEQA Guidelines, section 15380, the status of the NSO as a threatened species pursuant to the federal ESA (16 U.S.C. § 1531 et seq.) and under the CESA (Fish & G. Code, § 2050 et seq.) qualifies it as an endangered, rare, or threatened species under CEQA.

Based on the foregoing, if NSO are nesting within 0.25 miles of the Project site, Project impacts may substantially reduce the number of NSO which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

**Recommended Mitigation Measure:** For an adequate environmental setting, to comply with CESA, and to reduce impacts to NSO to less-than-significant, CDFW recommends including the below mitigation measure.

*Northern Spotted Owl Surveys.* No Project activities within 0.25 miles of potential NSO nesting habitat shall occur between February 1 to July 31 unless a qualified biologist approved in writing by CDFW conducts NSO surveys following the *U.S. Fish and Wildlife Service (USFWS) Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls*, dated (revised) January 9, 2012 (see: <https://www.fws.gov/sites/default/files/documents/survey-protocol-for-northern-spotted-owl.pdf>). Surveys shall be conducted in accordance with Section 9 of the survey protocol, Surveys for Disturbance-Only Projects. If breeding NSO are detected during surveys, a 0.25 mile no-disturbance buffer zone shall be implemented around the nest until the end of the breeding season, or a qualified biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. The Project shall obtain CDFW’s written acceptance of the qualified biologist and survey report prior to Project construction occurring between February 1 and July 31 each year.

Alternate buffer zones may be proposed to CDFW after conducting an auditory and visual disturbance analysis following the USFWS guidance, *Estimating the Effects of*

Jon Campo  
 Marin County Open Space District  
 March 7, 2023  
 Page 5

*Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California*, dated October 1, 2020. Alternative buffers must be approved in writing by CDFW.

If take of NSO cannot be avoided, the Project shall consult with CDFW pursuant to CESA and obtain an ITP, and also consult with USFWS pursuant to the federal ESA.

**Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?**

**Comment 3:** Marin checker lily (*Fritillaria lanceolata* var. *tristulis*), California Rare Plant Rank (CRPR)<sup>2</sup> 1B.1; Congested-headed hayfield tarplant (*Hemizonia congesta* ssp. *congesta*), CRPR 1B.2; Tamalpais lessingia (*Lessingia micradenia* var. *micradenia*), CRPR 1B.2; Marin manzanita (*Arctostaphylos virgata*), CRPR 1B.2; and other special-status plants, Page 92 and 100.

**Issue:** The discussion of special-status plants on page 92 states that “a number” of special-status plants have the potential to occur, but that no special-status plants were located during site visits and surveys. The MND states that no impacts to special-status plants would occur because none were found in the study area (page 100). However, it is not clear if surveys and site visits were conducted during the appropriate bloom periods for all potentially occurring special-status plants and if surveys followed accepted protocols. Additionally, both annual and perennial plants may have occupied the Project site following the surveys conducted in 2016 and site visits in 2020.

According to the California Natural Diversity Database (CNDDDB 2023), Marin checker lily has three occurrences within 5 miles of the Project location with the closest occurrence 0.7 miles southeast of the Project, congested-headed hayfield tarplant has five occurrences within 5 miles of the Project location with the closest occurrence 0.7 miles southeast of the Project, Tamalpais lessingia has seven occurrences within 5 miles with the closest occurrence being 0.4 miles east-northeast of the Project site, and Marin manzanita has nine occurrences within 5 miles of the Project location with the closest occurrence 1.2 miles southwest of the Project site.

**Specific impact, why the impact would occur, and evidence impact would be potentially significant:** Special-status plants may be impacted by ground-disturbing activities and vegetation removal. For example, vehicle, equipment, and foot traffic may bury, excavate, crush, trample, or disturb special-status plants. Soil disturbance may result in permanent loss of special-status plants.

Plants with a CRPR of 1B are rare throughout their range, endemic to California, and are seriously or fairly threatened. Most plants that are ranked 1B have declined significantly over the last century (CNPS 2023). Marin checker lily has the additional threat rank of 0.1, indicating that over 80 percent of its occurrences are threatened; the other plants discussed above have the additional threat rank of 0.2, indicating that 20 to 80 percent of their occurrences are threatened (CNPS 2023).

Impacts to special-status plants including, but not limited to, Marin checker lily, Congested-headed hayfield tarplant, Tamalpais lessingia, and Marin manzanita may result in local population declines or extirpation of a species. Insufficient mitigation may result in prolonged temporal or permanent impacts to a special-status plant species' range, distribution, and population in the State. Therefore, if special-status plants occur

<sup>2</sup> CRPR rank definitions are available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>) and on the California Native Plant Society website (<https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>).

7 cont.

8

Master  
Response 3

Jon Campo  
 Marin County Open Space District  
 March 7, 2023  
 Page 6

on or adjacent to the Project site where they may be impacted, impacts to special-status plants would be potentially significant.

**Recommended Mitigation Measure:** For an adequate environmental setting and to reduce impacts to special-status plants such as Marin checker lily, Congested-headed hayfield tarplant, Tamalpais lessingia, and Marin manzanita to less-than-significant, CDFW recommends including the below mitigation measure.

*Pre-Project Special-Status Plant Surveys.* Prior to the start of Project activities, a Qualified Biologist shall conduct a habitat assessment for special-status plants. If potential habitat for special-status plants is present, botanical surveys shall be conducted during the appropriate blooming period and conditions for all special-status plants that have the potential to occur within or near the Project where they may be directly or indirectly impacted by for example, modifications to hydrological conditions. More than one year of surveys during appropriate conditions may be necessary. Surveys and associated reporting shall be conducted according to CDFW's 2018 *Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (see:

<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>. The habitat assessment and survey reports shall be submitted to CDFW prior to the start of construction. Project activities shall not proceed until CDFW has provided written approval of the habitat assessment and survey reports. If any special-status plant species are observed, the Project shall fully avoid direct and indirect impacts to all individuals and prepare and implement a CDFW-approved avoidance plan prior to Project activities. If impacts to special-status plants cannot be avoided, the Project shall provide habitat compensation at a 3:1 mitigation to impact ratio including permanent protection of habitat through a conservation easement and funding and implementing a long-term management plan, prior to Project activities, unless otherwise approved in writing by CDFW.

### III. Editorial Comments and/or Suggestions

**Comment 4:** Policies and BMPs, Pages 37, 38, 99, 113, and Appendix A

While the MND lists applicable policies and BMPs that will be incorporated into the design and implementation of the Project, CDFW recommends that the MND list applicable policies and BMPs as mitigation measures to ensure they are enforceable.

**Comment 5:** Special-Status Species Table

CDFW recommends that a list or table of all special-status species with the potential to occur at the Project be included in the MND or publicly available biological report. This list or table should include the source of information about each potentially occurring special-status species (e.g., CNDDDB), and discussion of why or why not the species has potential to occur at the Project or adjacent to the Project where the species may be indirectly impacted by, for example, visual or auditory disturbances, or hydrological modifications (e.g., will not occur due lack of salt marsh habitat at or near the Project).

### ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

8 cont.

Master  
Response 39 Master  
Response 110 Master  
Response 111 Master  
Response 1

Jon Campo  
 Marin County Open Space District  
 March 7, 2023  
 Page 7

## ENVIRONMENTAL DOCUMENT FILING FEES

12 The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Master  
Response 1

## CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the District in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Alex Single, Environmental Scientist, at (707) 799-4210 or [Alex.Single@wildlife.ca.gov](mailto:Alex.Single@wildlife.ca.gov); or Melanie Day, Senior Environmental Scientist (Supervisory), at [Melanie.Day@wildlife.ca.gov](mailto:Melanie.Day@wildlife.ca.gov) or (707) 210-4415.

Sincerely,

DocuSigned by:  
  
 B77E9A6211EF486  
 Erin Chappell  
 Regional Manager  
 Bay Delta Region

Attachment 1. Draft Mitigation and Monitoring Reporting Plan

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2023020117)

## REFERENCES

California Native Plant Society, Rare Plant Program. 2023. Rare Plant Inventory (online edition, v9.5). Website <https://www.rareplants.cnps.org> [accessed 27 February 2023].

CDFW. 2016. A status review of the northern spotted owl (*Strix occidentalis caurina*) in California. Report to the Fish and Game Commission, California Department of Fish and Wildlife, Sacramento, CA, USA.

CDFW. 2023. California Natural Diversity Database (CNDDDB) Management Framework. California Department of Fish and Wildlife. Sacramento, CA. Website <https://wildlife.ca.gov/Data/BIOS> [accessed 27 February 2023].

Hayward, L. S., A. E. Bowles, J. C. Ha, and S. K. Wasser. 2011. Impacts of acute and long-term vehicle exposure on physiology and reproductive success of the northern spotted owl. *Ecosphere* 2:65.

Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

USFWS. 2020. Revised Transmittal of Guidance: Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California.

Jon Campo  
 Marin County Open Space District  
 March 7, 2023  
 Page 8

## ATTACHMENT 1

### Draft Mitigation and Monitoring Reporting Plan

Biological Resources (BIO)			
Mitigation Measure (MM)	Description	Timing	Responsible Party
13 BIO-3	<p><i>Lake and Streambed Alteration Notification and other Resource Agency Permits.</i> The Project shall notify CDFW pursuant to Fish and Game Code section 1600 et seq. using the Environmental Permit Information Management System (see: <a href="https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS">https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS</a>) for Project activities affecting lakes or streams, associated riparian or otherwise hydrologically connected habitat, and any connected wetlands, and shall comply with the Streambed Alteration Agreement, if issued. Projects shall also obtain and comply with applicable permits from the RWQCB and USACE pursuant to the Clean Water Act and Porter-Cologne Water Quality Control Act.</p>	Prior to Ground Disturbance and continuing over the course of the Project	Master Response 1 Project Applicant
14 BIO-4	<p><i>Northern Spotted Owl Surveys.</i> No Project activities within 0.25 miles of potential NSO nesting habitat shall occur between February 1 to July 31 unless a qualified biologist approved in writing by CDFW conducts NSO surveys following the USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls, dated (revised) January 9, 2012 (see: <a href="https://www.fws.gov/sites/default/files/documents/survey-protocol-for-northern-spotted-owl.pdf">https://www.fws.gov/sites/default/files/documents/survey-protocol-for-northern-spotted-owl.pdf</a>). Surveys shall be conducted in accordance with Section 9 of the survey protocol, Surveys for Disturbance-Only Projects. If breeding NSO are detected during surveys, a 0.25 mile no-disturbance buffer zone shall be implemented around the nest until the end of the breeding season, or a qualified biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. The Project shall obtain CDFW's written acceptance of the qualified biologist and survey report prior to Project construction occurring between February 1 and July 31 each year.</p> <p>Alternate buffer zones may be proposed to CDFW after conducting an auditory and visual disturbance analysis following the USFWS guidance, Estimating the Effects of Auditory and Visual Disturbance to NSO and Marbled Murrelets in Northwestern California, dated October 1, 2020. Alternative buffers must be approved in writing by CDFW.</p> <p>If take of NSO cannot be avoided, the Project shall consult with CDFW pursuant to CESA and obtain an ITP, and also consult with USFWS pursuant to the federal ESA. pursuant to the federal ESA.</p>	Prior to Ground Disturbance and continuing over the course of the Project	Master Response 2 Project Applicant
BIO-5	<p><i>Pre-Project Special-Status Plant Surveys.</i> Prior to the start of Project activities, a Qualified Biologist shall conduct a habitat assessment for special-status plants. If potential habitat for special-status plants is present,</p>	Prior to Ground Disturbance	Project Applicant

Jon Campo  
Marin County Open Space District  
March 7, 2023  
Page 9

15

	<p>botanical surveys shall be conducted during the appropriate blooming period and conditions for all special-status plants that have the potential to occur within or near the Project where they may be directly or indirectly impacted by for example, modifications to hydrological conditions. More than one year of surveys during appropriate conditions may be necessary. Surveys and associated reporting shall be conducted according to CDFW's 2018 <i>Protocol for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities</i> (see: <a href="https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&amp;inline">https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&amp;inline</a>). The habitat assessment and survey reports shall be submitted to CDFW prior to the start of construction. Project activities shall not proceed until CDFW has provided written approval of the habitat assessment and survey reports. If any special-status plant species are observed, the Project shall fully avoid direct and indirect impacts to all individuals and prepare and implement a CDFW-approved avoidance plan prior to Project activities. If impacts to special-status plants cannot be avoided, the Project shall provide habitat compensation at a 3:1 mitigation to impact ratio including permanent protection of habitat through a conservation easement and funding and implementing a long-term management plan, prior to Project activities, unless otherwise approved in writing by CDFW.</p>		<p>Master Response 3</p>
--	---	--	------------------------------

**From:** [Eric Morey](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Eric Morey  
**Date:** Sunday, March 05, 2023 11:39:50 PM  
**Attachments:** [Roys Redwoods EIR Support Ltr.pdf](#)  
[1](#)



### IS/MND Public Comments Roy's Redwoods Restoration

Name	Eric Morey
Email	sgvpg.notice@gmail.com
Zipcode	94933
Comments	<p>Re: Support for Negative Declaration for Roy's Redwoods Restoration</p> <p>Dear Parks Department,</p> <p>The San Geronimo Valley Planning Group supports the Notice of Intent to Adopt a Mitigated Negative Declaration for the Marin Open Space District (MCOSSD) draft Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Roy's Redwoods Restoration Project.</p> <p>The Planning Group has followed the progress of this project from the beginning and has been active in participating in County meetings and field trips to the site, as well as hosting a virtual meeting with the community and posting a video to our website.</p> <p>We believe that any potentially significant environmental impacts that could result from implementation of the proposed project will be more than mitigated by the restoration itself. The restoration will reduce potentially significant environmental impacts to a less than significant level, and the completed project would not result in any significant environmental impacts.</p> <p>We look forward to the healthy environment and enhanced visitor experience that will result from the Roy's Redwoods restoration. We urge the Board of Supervisors to approve the negative declaration for this project.</p>

1

Master  
Response 8

Sincerely,

Eric Morey, Chair, San Geronimo Valley Planning  
Group  
Jean Berensmeier, Chair of Roy's Redwoods  
Committee

Attach a File

[Roys Redwoods EIR Support Ltr.pdf](#)

You can [edit this submission](#) and [view all your submissions](#) easily.



PO Box 57  
Forest Knolls CA 94933-0057  
SGVPG.org

March 5, 2023

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

Re: Support for Negative Declaration for Roy's Redwoods Restoration

Dear Parks Department,

The San Geronimo Valley Planning Group supports the Notice of Intent to Adopt a Mitigated Negative Declaration for the Marin Open Space District (MCOSD) draft Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Roy's Redwoods Restoration Project.

The Planning Group has followed the progress of this project from the beginning and has been active in participating in County meetings and field trips to the site, as well as hosting a virtual meeting with the community and posting a video to our website.

Master  
Response 8

We believe that any potentially significant environmental impacts that could result from implementation of the proposed project will be more than mitigated by the restoration itself. The restoration will reduce potentially significant environmental impacts to a less than significant level, and the completed project would not result in any significant environmental impacts.

We look forward to the healthy environment and enhanced visitor experience that will result from the Roy's Redwoods restoration. We urge the Board of Supervisors to approve the negative declaration for this project.

Sincerely,

Eric Morey, Chair, San Geronimo Valley Planning Group  
Jean Berensmeier, Chair of Roy's Redwoods Committee

**From:** [Carolyn Longstreth](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Carolyn Longstreth  
**Date:** Thursday, March 9, 2023 12:41:35 PM  
**Attachments:** [1](#)



### IS/MND Public Comments Roy's Redwoods Restoration

Name	Carolyn Longstreth
Email	cklongstreth@gmail.com
Zipcode	94937
Comments	To: Marin County Open Space District From: Eva Buxton and Carolyn Longstreth, Marin Chapter, California Native Plant Society Re: Roy's Redwoods Restoration Project IS/MND Date: March 9, 2023

This comment is submitted on behalf of the Marin Chapter of CNPS. As you know, the California Native Plant Society is an organization of over 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.

1

Marin CNPS is pleased to support the Roy's Redwoods Restoration Project, and specifically, the plans to reduce social trails and revegetate the compacted, trampled and denuded areas with appropriate understory native plants. We do anticipate that MCP will need to take stronger measures than those described to prevent trampling of newly vegetated areas, probably low barriers, either temporary or permanent, such as split rail fences. The latter are commonly used to protect other sensitive understory areas at such iconic parks as Muir Woods and Mariposa Grove in Yosemite.

Master Response 8

We make the following further observations:

Plant Surveys

2

The biological resources study was contracted out to Prunuske Chatham, Inc. (PCI). It appears that

2 cont.

plant surveys were not done according to CDFW and CNPS protocols. The ID/MND states: “PCI conducted full floristic botanical surveys on April 15 and July 2, 2020, with supplemental assessments on July 11, 2017 and November 4, 2020.” It is unclear if the “supplemental survey”(2017) was conducted three years before the main surveys in 2020. We believe that surveys need to be conducted within five years of a project. In addition, to be appropriately-timed, surveys should occur during the entire flowering season of potentially occurring special-status and uncommon species, as well as for a floristic inventory. Finally, it is customary to include a list of plants with a potential to occur in an area based on a search of CNDDDB (California Natural Diversity Data Base), but such a table is missing from the report.

Master Response 3

3

Although it is not likely that legally protected species are present in the project area, two species uncommon in Marin (Marin Flora 2007)-- Enchanters nightshade (*Circaea alpina* subsp. *pacifica*) and potentially Snow queen (*Synthyris reniformis*)-- are or may be present on the site.

Both species reach their southern distributional limit in Marin. Enchanter’s nightshade, which definitely grows in the alluvial portion on the project site (Eva Buxton, personal observation), should be included in the seed mix for restoration. The CalFlora website shows that Snow-queen has been documented in the vicinity; the species has an affinity for redwood, Douglas-fir and mixed evergreen forests. The bloom period runs from February through June.

Master Response 3

4

Pre-construction surveys, as suggested in the document, do not necessarily coincide with the best time to detect the presence of important species. Thus, the prescription for surveys should not only expressly include plants but also assure that botanical surveys take place at opportune times.

Master Response 3

5

#### Legacy Zone

It is unclear if cyclists are to be allowed on all Roy’s Redwoods trails. MCP has labelled a large portion of Roy’s Redwoods as Legacy Zone and as such it should serve as a sanctuary for natural resources. Should mountain bikers be allowed to use trails in such a zone? Other legacy zone parcels

Master Response 6

5 cont.

in Marin, for example, the Ring Mountain and Old St Hilary's parcels, do not allow bikes on their lands. If bikers are to be allowed, the need for some kind of barriers around the restored vegetation will become even more pressing. Moreover, with the plans to provide trails and facilities for children and handicapped individuals, mountain biking would increase the likelihood of collisions and negative interactions among preserve visitors.

Master Response 6

Please clarify if mountain bikers will be allowed on all trails and how negative interactions can be mitigated.

"Scramble" area

6

CNPS is pleased that an area with a scramble trail is set aside for children within the restored part of the preserve. The area, which will now have boardwalks, have always been an outdoor education site and a beloved area for children to play, including playing in the streams, balancing on the downed log, and building little forts with sticks found in nature.

Master Response 8

Invasive species

7

We urge the county to be vigilant about new invasions of non-native species and to assure strict compliance with all pertinent management practices, such as cleaning of equipment, regular monitoring, and implementation of Early Detection/Rapid Response (EDRR). (See Vegetation and Biodiversity Management Plan, Table 7-5). Similar vigilance will be needed to guard against Sudden Oak Death (SOD) and other pathogens and pests.

Master Response 7

Thank you for the opportunity to comment on the IS/MND for the Roy's Redwoods Open Space parcel.

**From:** [Linda Novy](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Linda Novy  
**Date:** Thursday, March 9, 2023 5:25:18 PM  
**Attachments:** [Letter to Jon Campo.docx](#)  
1

---



### IS/MND Public Comments Roy's Redwoods Restoration

Name	Linda Novy
Email	<a href="mailto:lindanovy@comcast.net">lindanovy@comcast.net</a>
Zipcode	94930
Comments	Marin Horse Council is pleased to submit a comment letter.
Attach a File	<a href="#">Letter to Jon Campo.docx</a>

You can [edit this submission](#) and [view all your submissions](#) easily.



March 9, 2023

Jon Campo  
 Principal Natural Resources Planner  
 Marin County Parks Department, Suite 260  
 3501 Civic Center Drive  
 San Rafael, CA 94903

Dear Jon:

1 | Marin Horse Council (MHC) appreciates the time and effort you and MCP staff have invested in Roy's Redwoods restoration project. Our board is in full support of your efforts to restore and protect this public gem. It is heartening to see the "Inclusive Access" nature of the plan into the interior of the lower portion of the grove so that more people can find quiet and healing in the redwoods. Master Response 8

Our comments are as follows:

2 | The overall plan looks good. Roy's Redwoods Preserve is enjoyed by many visitors, and horse riders from Dickson Ranch and Creekside Equestrian Center ride it frequently when it is open. Our concerns are around the narrowness and level of activity of and in the entrances where visitors on foot and OPDMDs are entering the preserve while riders with their horses may be walking by. It looks narrow and feeds people right onto a horse and pedestrian pathway. Signage may be needed to point out that this is an equestrian and pedestrian trail. In addition, where the Roy's Redwood Trail turns right (east) the relocated outhouse and trash receptacle may be another busy pinch point. And, lastly, visitors using OPDMDs will be entering as well, adding to the potential for horses to spook, no matter how skillful riders are and how well trained their mounts. Master Response 6

If during the design / build phase, we could meet with you and the LSA, and review and potentially tweak the design features to create more safety for all, that would be ideal. Taking the trail tightness at the entry points and level of activity under consideration is important to MHC and the equestrians we represent. Thank you.

3 | MHC is very grateful that Roy's is a hiker and equestrian preserve and does not allow bike riding. We do support the Inclusive Access aspect of the project. Our concern is that bike riders on ebikes (OPDMDs) will use the IAP trail as an entry point to ride the Roy's Redwood Loop Trail. Bike riders have steadily been poaching the trails in this preserve. Will there be monitoring for this both ebikes and other mtn. bikes? Master Response 7

4 | Thank you for continuing the requirement that all dogs must be on leashes. Again, more monitoring is needed as visitors from the San Geronimo Commons frequently enter the Loop Trail from there with dogs off leash. [Master Response 8](#)

5 | During the construction phases, presumably during the non-rainy time of the year, will Roy's Redwood Loop be closed in this area? Equestrians can utilize other aspects of the trail as needed. [Other Responses](#)

We look forward to the project and getting involved in the design/build phase at the appropriate time.

Sincerely,

*Amory Willis*

Amory Willis, President

*Robert Eichstaedt*

Robert Eichstaedt, Public Lands Chair

**From:** [MCL](#)  
**To:** [Campo, Jon](#)  
**Subject:** MCL: Comment Letter - Roy's Redwoods Restoration Project: Draft DIS/MND  
**Date:** Thursday, March 9, 2023 4:42:52 PM  
**Attachments:** [image001.gif](#)  
[image002.gif](#)  
[MCL\\_Roys Redwoods Restoration Project\\_3.8.2023.pdf](#)

---

Dear Mr. Campo,

Please find attached a comment letter from MCL in reference to Roy's Redwoods Restoration Project – Draft Initial Study/Mitigated Negative Declaration dated March 9<sup>th</sup>, 2023.

If you have any issue with the download of the letter, please let me know.

Kind regards,

Martha Richter Smith  
*Office Administrator*

**Marin Conservation League**

175 N. Redwood Dr. Suite 135

San Rafael, CA 94903

415-485-6257



March 9<sup>th</sup>, 2023



Protecting Marin Since 1934

Jon Campo  
Principal Planner  
Marin County Open Space District  
3501 Civic Center Drive, Suite 260  
San Rafael, CA 94903

Via Email: [jcampo@marincounty.org](mailto:jcampo@marincounty.org)

**Re: Roys Redwoods Restoration Project – Draft Initial Study/Mitigated Negative Declaration**

Dear Jon:

Marin Conservation League is pleased to submit comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Roy's Redwoods Restoration Project. A 19-acre bay and redwood forest portion of the 293-acre preserve is the subject of the restoration project. The project is a joint effort by Marin County Parks (MCP) Department and OneTam to 1) restore and enhance the health of the old-growth redwood forest by restoring healthy soil conditions and reestablishing a diverse forest understory plant community; 2) restore and enhance hydrologic process and function of Larsen Creek, a tributary to San Geronimo Creek within the Lagunitas Creek watershed; and 3) improve the visitor immersive experience in nature, consistent with restoration goals, by decommissioning and realigning the current welter of social trails to provide a safe and sustainable year-round access to the bay and redwood forest portion of the Preserve. The project will also create access consistent with the Marin County Open Space District's (MCOSD's) Inclusive Access Plan and provide visitor interpretive services.

Project Need

Roy's Redwoods Open Space Preserve is owned and operated by the MCOSD and is currently utilized by walkers, hikers, cyclists (in limited areas), equestrians, school children, and other outdoor enthusiasts. Marin Conservation League has long treasured the Roy's Redwoods Preserve as one of the first acquisitions for the MCOSD in 1978, the first preserve in San Geronimo Valley. With its remarkable grove of old growth redwoods that somehow escaped being logged in the early 19th century, it is one of the jewels among the 34 open space preserves in the MCOSD. Therefore, MCL has been following the evolution of the project closely since

175 N. Redwood Dr., Ste. 135, San Rafael, CA 94903 | 415.485.6257 |  
mcl@marinconservationleague.org

Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

2017, when community workshops, both on and off site, were initiated to explore possible concepts for improvements.

Under many years of private ownerships, the grove endured a wide variety of uses and misuses before becoming a public preserve. The overall redwood forest and Larsen Creek ecosystem has been degraded by a sprawling network of trails, resulting in compacted soils, trampled or denuded ground story vegetation, and compromised hydrology. The County now has the long-envisioned opportunity to improve hydrologic functions, such as filling incised channels and slowing and spreading flood waters to improve groundwater infiltration and recharge; to enhance the long-term health of the redwood grove and restore its vegetative understory; and to protect habitat of the threatened Northern Spotted Owl. In recreating the natural hydrology of Larsen Creek, the project will also benefit salmonid habitat in San Geronimo Creek some 3,000 feet beyond. The project is designed to benefit these resources, and at the same time to maintain a “wild” ambience that makes the Preserve particularly popular for families, walkers, and equestrians.

Initial Study/Mitigated Negative Declaration

1 We have reviewed the Draft IS/Mitigated Neg. Dec. and agree with its conclusion that all identified potentially significant impacts can be mitigated to a less-than-significant level by incorporating applicable best management practices (BMPs) and policies from the Road and Trail Management Plan (RTMP) Program environmental impact report (EIR), along with the addition of Mitigation Measures Bio 1, 2, and 3. We agree that the project itself is designed to improve biological and hydrological resources and therefore has an overall beneficial impact on the environment. With one exception, we believe that the document is otherwise thorough and complete in its discussion of all CEQA topics. Master Response 8

2 The one exception is in the discussion of Recreation. Although we have been assured on several occasions that opportunities *to sit* while visiting the preserve will in fact be provided, that amenity is notably missing as an essential component of visitors’ “immersive experience in nature” in Roy’s Redwoods Preserve and should be included in both text and design graphics. Several arguments support this need. First, unlike the majority of preserves in the MCOSD, which feature roads and trails for continual movement, Roy’s Redwoods is distinctive in also offering a different kind of experience – that is, a redwood grove as a destination in itself, to be enjoyed passively – as a cool respite from summer heat, for example, or as a place for quiet contemplation. Second, the requirements for Inclusive Access should assume that persons with mobility impairment – in a wheelchair, for example – will likely be accompanied by a companion on foot, in need of sitting during the shared visit. Third, parents may want to sit while their children enjoy the discovery area. Without becoming a “park” as defined by the MCP, this preserve is “different” from other preserves. Facilities for sitting need not be extensive; benches could be strategically incorporated into other design features, such as log or Master Response 6

175 N. Redwood Dr., Ste. 135, San Rafael, CA 94903 | 415.485.6257 |  
 mcl@marinconservationleague.org

Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

2 cont.

timber trail borders, or split rail fencing. This could be done informally and inconspicuously without impacting any sensitive resources.

We will appreciate your considering this suggestion in amending the Draft document.

Conclusion

3

Finally, Marin Conservation League supports the Roy's Redwoods Restoration Project as described and appreciates the thoroughness of the Initial Study/Mitigated Negative Declaration.

Master  
Response 8

Sincerely yours,



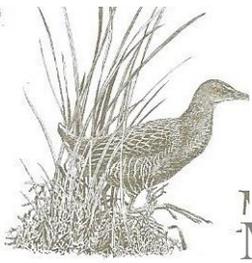
Robert Miller  
President



Terri Thomas  
Chair, Parks and Open  
Space Committee



Nona Dennis  
Parks and Open  
Space Committee



# Marin Audubon Society

P.O. Box 599 | MILL VALLEY, CA 94942-0599 | MARINAUDUBON.ORG

March 10, 2023

Jon Campo, Principal Open Space Planner  
Marin County Open Space District  
Civic Center Drive  
San Rafael, CA

RE: Comments on Initial Study/Mitigated Negative Declaration for the Roy's Redwoods Restoration Project

Dear Mr. Campo,

1

The Marin Audubon Society appreciates the opportunity to comment on the Initial Study/Negative Declaration for the Roy's Redwoods Open Space Preserve Restoration Plan. The purpose of the Plan is to improve environmental conditions and enhance the experience of the public at this Preserve in the San Geronimo Valley. The 19.5-acre project area encompasses the valley floor and supports redwood forest, California bay forest and oak woodlands, grassland and wetland habitats. We support the project 's intent to correct and prevent from continuing, the unauthorized trail system, soil compaction, denuded vegetation, soil erosion and sedimentation of aquatic resources, that have been caused by public overuse.

Master  
Response 8

2

A major concern for MAS is protection of Northern Spotted Owl (NSO) and their habitat, particularly the stand of old growth and large second growth redwood trees. Point Blue Conservation Science surveys have not found NSO nesting within the project site since 2006, but in 2020 and 2021, a pair of NSO produced young within 1,300 feet of the project site and a nest was in the same location in 2022. This raises question whether the extensive human activity has resulted in the NSO abandoning a nest site within the project area. The project is an opportunity to identify and implement measures that could encourage NSO to return to the project area to nest. For example, trails and other uses could be restricted from the area where nesting was previously successful. We recommend the OSD study ways to improve likelihood of NSO returning to the project area to nest.

Master  
Response 2

3

The Plan is designed to achieve many beneficial outcomes. Some project components, however, have the potential to adversely impact habitat. These include construction of trails and boardwalks that would cause the loss of

Other

3 cont.

understory vegetation, soil disturbance and compaction. Boardwalks designed to direct visitors out of the wetland would impact understory vegetation, some or all of which would be a permanent loss due to coverage of the ground. The area of understory vegetation to be restored should at least be equal or exceed the area of understory vegetation that has been or will be destroyed.

4

It is proposed that Dusky-footed Woodrat nests be protected by buffer zones and relocation (Mitigation BI0-1), if nests can't be avoided. More information is needed to determine whether these actions would be or could be effective protecting woodrat nests, or even whether they are possible:

- Avoidance: What efforts would be made to avoid the nests? How many nests have been identified in the project area? Are there nests in the area where boardwalks would be built? What is the proposed width and other characteristics of the proposed buffer? Are there locations where the proposed buffer has proven to be adequate protection?
- Relocation: We are alarmed at the potential for relocating nests. It is unclear whether it would be effective, or even possible, to relocate nests. Where has relocation been done before? Has it been successful? How would the internal structure of nests be duplicated?

Master Response 2

Woodrat nests should be protected where they are and conditions should be created to encourage their expansion.

5

The IS reports that the project is designed to not remove any trees and to minimize pruning and impacts to tree root zones. A tree replacement plan would be developed for any trees that are removed. Why is a replacement plan needed if no trees to be removed? This seems in conflict with the claim to not remove trees.

Other

6

The IS states that new trails would guide visitors out of habitats. It is doubtful, however, that trees placed to direct visitor use would, alone, keep people in the right place. How would it be assured that people remain on the new trails, and on the boardwalks, and do not reoccupy, or create new, unauthorized trails, in spite of the Project restoration? Would enforcement be increased? Would signs advising visitors to stay on trails and adverse impacts of going off-trail?

Master Response 7

Thank you for responding to our concerns/

Sierra Nevada Conservancy

**From:** [David Bernard](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - David Bernard  
**Date:** Wednesday, February 22, 2023 10:25:48 AM  
**Attachments:** [1](#)



### IS/MND Public Comments Roy's Redwoods Restoration

Name	David Bernard
Email	davidj.bernard@mac.com
Zipcode	94963
Comments	<p>Hello my name is David Bernard and I'm the President of the French Ranch Home Owners Association (FRHOA). The FRHOA is responsible for the West Nicasio Rd that enters Nicasio Valley Drive immediately east of the project</p> <p>My Comments are directed to the public access and parking. The mitigation described for Parking and Entryway Improvements do not adequately address the dangers and congestion the current or increased usage of Roy' Redwoods:</p> <p>1 As mentioned in the IS/MMD: "Visitors park on the east and west shoulders of Nicasio Valley Road and often cross the roadway to access the trailhead". Cars often travel at very high speeds along this straight stretch of road and use this section as a last passing lane before entering an extensive distance of narrow curving road. Nicasio Valley Road sees very heavy usage by large trucks as well being a very popular bike route. The IS/MMD needs to address this issue.</p> <p>2 As mentioned in the IS/MMD: "in 2020, the Marin County Department of Public Works installed no parking signs on the western side of Nicasio Valley Road for approximately 200 feet north from W. Nicasio Road to provide improved line-of-sight for residents when turning into and out of W. Nicasio Road" This was done at the insistence of the local community as a result of several accidents and near accidents at this intersection. This has improved the safety at the intersection, but it has not eliminated the danger, and had the effect of reducing parking</p>

Master  
Response 4

Master  
Response 4

2 cont.

and increasing congestion. The IS/MMD needs to address this issue.

In times of high usage parking on the east side of the of Nicasio Valley Road can be fully occupied, causing cars looking for parking to slow or stop in the road way, creating an unsafe condition.

3 Additionally if no parking is available on the east side cars are forced to make a U-turn across the road way. There is no safe way to turn around from heading north past the park as the road quickly starts up hill. The IS/MMD needs to address this issue.

4 The largest deficiency of the IS/MMD is that it fails to address the combined impact of Roy' Redwoods and the use of the San Geronimo Commons. The parking used to access Roy' Redwoods is also used by visitors to the Commons. Given that the county is in the process to purchase this property this cannot be ignored. The IS/MMD needs to address this issue.

Master  
Response 4

Master  
Response 4

You can [edit this submission](#) and [view all your submissions](#) easily.

**From:** [Gerry Toriumi](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Gerry Toriumi  
**Date:** Tuesday, February 07, 2023 11:57:19 AM  
**Attachments:** [1](#)



**IS/MND Public Comments Roy's Redwoods Restoration**

Name	Gerry Toriumi
Email	geraldtoriumi@comcast.net
Zipcode	94973

Comments

8 Parking doesn't need to be improved, visitors should park at the adjacent golf course club parking lot, and hike in to visit Roy's Woods. Leave the park trails, and habitat alone; just maintain what's already there in its natural state. Adding boardwalks, or remedial paving will destroy the feeling of visiting a primordial forest. Natural beauty is rare to find these days; your proposed mitigation measures, removes the wilderness experience forever. Before you know it, the Spandex Mountain bikers will ask for a downhill race course there.

Master Response 8  
 Additional Information in Master Responses 4 and 6

You can [edit this submission](#) and [view all your submissions](#) easily.

**From:** [fred bretz](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - fred bretz  
**Date:** Saturday, February 11, 2023 9:19:30 PM  
**Attachments:** [1](#)

---



### IS/MND Public Comments Roy's Redwoods Restoration

Name	fred bretz
Email	fbretz@comcast.net
Zipcode	94963
Comments	<p>1 Has more than one study paid to a young PHD by spawn in order to get grant money for Larsen creek been done to substantiate the claims that this creek could actually support a Coho population .</p>

Other Responses

You can [edit this submission](#) and [view all your submissions](#) easily.

**From:** [Carmelita Ellis](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Carmelita Ellis  
**Date:** Monday, February 13, 2023 4:04:43 PM  
**Attachments:** [1](#)



**IS/MND Public Comments Roy's Redwoods Restoration**

Name	Carmelita Ellis
Email	wellis1603@aol.com
Zipcode	94963
Comments	<p>Concern @ speed limit wherever entrances into Roy's Woods are ultimately placed. Of equal concern is parking and Lory location as it pertains to entrance and exit onto</p> <p>1 West Nicasio Road. Speed down Nicasio Valley Road is 45 mph-but most days traveled at 55 mph. Two serious accidents out of West Nicasio Road in recent years. Families, and animals getting out of cars or, crossing over Nicasio Valley Rd to Roy's Woods are always at risk!</p> <p>2 What about Fire Department plans? How do they factor into traffic plans moving forward? Lots of changes and traffic that must be considered.</p>

Master  
Response 4

Master  
Response 4

You can [edit this submission](#) and [view all your submissions](#) easily.

**From:** [Linda Gomez](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Linda Gomez  
**Date:** Monday, February 13, 2023 8:26:05 AM  
**Attachments:** [1](#)



### IS/MND Public Comments Roy's Redwoods Restoration

Name	Linda Gomez
Email	liniegomez@gmail.com
Zipcode	94963
Comments	<p>Restoration of Roy's redwoods ecology is commendable. However, increased traffic in that area is stupid and ill advised. There have already been two accidents that I am aware of at the intersection of West Nicasio Road and Nicasio Valley Road. Why parking is not being moved to the parking area at the former golf course is beyond my comprehension. Encouraging folks to visit an ecologically sensitive area is unsound thinking.</p> <p>1 Prohibit parking on Nicasio Valley Road and move to old golf course parking. Use common sense</p>

Master Response 4

Master Response 8

You can [edit this submission](#) and [view all your submissions](#) easily.

**From:** [Margaret OBrien](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Margaret OBrien  
**Date:** Tuesday, February 14, 2023 10:28:18 AM  
**Attachments:** [1](#)

---



### IS/MND Public Comments Roy's Redwoods Restoration

Name	Margaret OBrien
Email	maohaus@gmail.com
Zipcode	94933

Comments	1 I think it is ridiculous that you say that you have contacted the community for input and I am just hearing about the major disruption to the natural habitat of Roy's Redwoods. If you want community input you should invite the community to the San Geronimo community center to present the plans. I strongly disagree with the plan to turn a natural habitat into tourist attraction.
----------	--

Master  
Response 5 and  
Master Response  
8

You can [edit this submission](#) and [view all your submissions](#) easily.

**From:** [Christopher Boyd](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Christopher Boyd  
**Date:** Wednesday, February 15, 2023 4:15:02 PM  
**Attachments:** [1](#)



### IS/MND Public Comments Roy's Redwoods Restoration

Name	Christopher Boyd
Email	uncollected@duck.com
Zipcode	94933
Comments	<p>Hi,</p> <p>1 I oppose your plan to sanitize Roy's Redwoods into a nature theme park. Please just leave it alone instead of making it a stop off for tourists on their way out to Point Reyes. It doesn't need your arrangement of sticks, logs and signs to make it fun. The whole idea makes me sad.</p> <p>2 Improving the bathrooms is a good idea. Thanks.</p>

Master  
Response 8

You can [edit this submission](#) and [view all your submissions](#) easily.

**From:** Daniel Ager  
**To:** Passantino, Rosemary; Campo, Jon; Julene, Michelle  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Daniel Ager  
**Date:** Tuesday, February 28, 2023 1:42:02 PM  
**Attachments:** [1](#)



**IS/MND Public Comments Roy's Redwoods Restoration**

Name	Daniel Ager
Email	conshus.is@gmail.com
Zipcode	94946
Comments	The spirit of maintaining the ecosystem of Roys Redwoods is admirable.

It is, however, not clear whether or not the project addresses the increased promotion of vegetation in the valley and the increased fire risk to homes on either side of the Moonhill ridge above Spirit Rock.

1 The fire road leading up from Roys Redwoods to the ridge above Spirit Rock hasn't been graded for over 20 years and currently is unusable for fire access. Does the 5670 ft + 1900 ft of trail improvements cover the rehabilitation of the fire road in case of emergency?

Other Responses

Marin County Fire seemingly does not have any knowledge of whether or not the fire road will be restored as part of this project. It appears that coordination between Parks and the Fire department is negligible to completely absent.

2 I strongly request that Marin County Parks coordinate with Marin County Fire to restore the fire road above Roys Redwoods to ensure that the safety of the neighboring homeowners and their families is considered as a part of the potential increased fire danger this restoration project may have.

Master Response 5

Thank you.

**From:** [Caitlin Evans](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Caitlin Evans  
**Date:** Friday, March 10, 2023 3:51:09 PM  
**Attachments:** [1](#)



**IS/MND Public Comments Roy's Redwoods Restoration**

Name	Caitlin Evans
Email	caitlin.evans.higgins@gmail.com
Zipcode	94930
Comments	Jon Campo Principal Natural Resources Planner Marin County Parks Department, Suite 260 3501 Civic Center Drive San Rafael, CA 94903

Re Final Schematic Design Phase for the Visitor Access and Public Engagement areas at Roy's Redwoods

Dear Jon:

I'm an equestrian from Creekside Equestrian Center and member of the Marin Horse Council (MHC). I regularly enjoy riding my horse, Richie, at Roy's Redwoods Preserve. I'm also a retired landscape architect with experience in campus planning and urban design. Though I'm impressed with the level of care and thought that has gone into the schematic design phase for the visitor access and public engagement areas at Roy's, I'm writing today in support of MHC's letter, dated 3/9/23. I share the concern regarding a high volume of users - including electric bikes - accessing the preserve via the only equestrian route through a potentially very congested area. I would add that signage (limiting speed and clarifying right of way) may help, but keeping sight lines open so that horses and riders are not surprised will be most critical to everyone's safety.

1

Master Response 6

Thank you for your fine work,  
Caitlin Evans

**From:** [Brad Kelley](#)  
**To:** [Passantino, Rosemary](#); [Campo, Jon](#); [Julene, Michelle](#)  
**Subject:** Re: IS/MND Public Comments Roy's Redwoods Restoration - Brad Kelley  
**Date:** Thursday, February 16, 2023 4:12:22 PM  
**Attachments:** [1](#)

---



### IS/MND Public Comments Roy's Redwoods Restoration

Name	Brad Kelley
Email	spambake@bradkelley.org
Zipcode	94930
Comments	<p>1 Starting on page 102 there are 13 misspellings of "dusky-footed woodrats". The misspelling "dusty-footed woodrat" should be correct to "dusky-footed woodrat"</p> <p>Interspersed in the document six times, "dusky-footed woodrat" is spelled correctly.</p>

Other  
Responses

You can [edit this submission](#) and [view all your submissions](#) easily.

Exhibit B: Roy's Redwoods  
Special-Status Wildlife Species  
Table

## Exhibit B. Special-status wildlife species evaluated for potential to occur in Roy's Redwoods Restoration Project Area.<sup>1</sup>

Species and Status <sup>2</sup> USFWS/CDFW	Natural History & Habitat	Potential for Occurrence within the Project Area
<b>Amphibians</b>		
California giant salamander <i>Dicamptodon ensatus</i> --/SSC	Occur in wet coastal forests near permanent and semi-permanent streams and springs. This species is one of the largest terrestrial salamanders in North America. Breeding occurs mostly in spring, but sometimes fall. Eggs are laid in water and larvae exhibit an enlarged tail fin for swimming with external gills. They transform into land dwelling salamanders with lungs around 18 to 24 months. They consume a wide variety of animals from small invertebrates to salamanders, rodents, and lizard – they exhibit a sit and wait feeding style. This species is endemic to California.	<b>Present.</b> These salamanders are known to occur on the preserve and there is anecdotal evidence they use perennial pools at the upper elevations of the preserve for breeding.
California red-legged frog <i>Rana draytonii</i> FT/SSC	Largest native frog in the western U.S. with females reaching up to 5¼ inches in length and males being slightly smaller. They are most common in marshes, streams, lakes, reservoirs, ponds, and other water sources with plant cover. Breeding occurs in deep, slow-moving waters with dense shrubby or emergent vegetation from late November through April. Floating egg masses are attached to emergent vegetation near the water's surface. Tadpoles require 3½ to 7 months to attain metamorphosis. During the non-breeding season, California red-legged frogs can remain at the breeding site (in the presence or absence of water) or move into surrounding non-breeding habitats. Adults eat invertebrates and small vertebrates. Larvae are algal grazers.	<b>Not likely to occur.</b> This species has not been documented within the preserve or the larger Larsen Creek watershed. Suitable breeding habitat is not present within the project site or the preserve. Potential breeding ponds exist on a nearby golf course but these ponds are populated with American bullfrogs (non-native predators) and stream flow conditions combined with distance make movement of any potential red-legged frogs from these ponds to the project site unlikely.
Foothill Yellow-legged Frog <i>Rana boylei</i> --/SSC	In or near partly shaded rocky streams that are shallow, slow, and moderately size from sea level to 6,300 feet. Breeding occurs from spring to early summer after high flows have receded. Eggs are laid at downstream end of rocks. Tadpoles require 3 to 4 months to attain metamorphosis. During all season, never found far from water.	<b>Not likely to occur.</b> Suitable habitat for this species is not present within the project site but does occur downstream. However, the species has been extirpated from most of its former range within Marin County and there have been no recent sightings of this species in San Geronimo Creek or Larsen Creek.
<b>Reptiles</b>		
Western pond turtle <i>Actinemys marmorata</i>	A year-round resident of Marin County, found in or near permanent or semi-permanent water sources (e.g., ponds, lakes, rivers, streams) with	<b>Not likely to occur.</b> Suitable habitat for pond turtles is not present within the project site but does occur downstream. However, although

<sup>1</sup> Marine species were omitted from this evaluation as suitable habitat is not present in the Preserve.

<sup>2</sup> Listing Status: FE-federally listed as endangered, FT-federally listed as threatened, FC-candidate for federal listing, BCC-Bird of Conservation Concern, SE-state listed as endangered, ST-state listed as threatened, Candidate SE-state candidate to be listed as endangered under CESA, Candidate ST-state candidate to be listed as threatened under CESA, FP-State of California fully-protected species, SSC-California Species of Special Concern, and WL-Watch List.

**Exhibit B. Special-status wildlife species evaluated for potential to occur in Roy's Redwoods Restoration Project Area.**

--/SSC	suitable basking sites and underwater retreats. Eggs are laid in shallow holes dug by the female from April through August. Eggs hatch in late summer or fall. In northern California, hatchlings can remain buried until the following spring. Turtles may use uplands for overland migration (movements up to 5 km) and nesting sites (nesting can occur over 500 m from water).	there is a historic occurrence (undated) within 2.7 miles of the project site, this species has not been documented within the Preserve or larger Larsen Creek watershed.
<b>Birds</b>		
Allen's hummingbird <i>Selasphorus sasin</i> BCC	This hummingbird breeds from February to July in a narrow strip of coastal forest, scrub, and chaparral from sea level to around 1,000 feet elevation along the West Coast of California. Females nest in areas with tree cover including eucalyptus, redwood, and Douglas-fir. This species overwinters in Mexico. They consume mostly nectar from flowering plants but also will eat small insects.	<b>Moderate potential to occur.</b> Project site is within species breeding range and includes suitable habitat.
black swift <i>Cypseloides niger</i> --/SSC	A fast flying swift and the largest in North America. Forages in open sky for insects, preferring mountain country and sea cliffs. Breeds in these habitat types often behind waterfalls in deep canyons and sea-bluffs above the surf. A semi-colonial nester. A casual migrant in Marin County.	<b>Not likely to occur.</b> No suitable breeding habitat present in project site. Last nearby sighting 7.25 miles away in 1983.
burrowing owl <i>Athene cunicularia</i> BCC/SSC	A small, ground-dwelling species of grasslands, prairies, rolling hills, and ranchlands. They feed primarily on insects, small mammals, reptiles, birds, and carrion. They hunt from perches, in flight, or hop on the ground for prey. Hunting occurs both during the day and at night. They use abandoned burrows of ground squirrels for roosting and nesting cover. Breeding occurs from March through August, but can begin as early as February and extend into December (Shuford and Gardali 2008). Pairs of owls may form loose colonies. They are the most gregarious owl species in North American. They are a year-round resident throughout most of the state, but migrants from other parts of the west may move into lowland areas in winter (Shuford and Gardali 2008).	<b>Not present.</b> Suitable habitat not present within the project site.
California black rail <i>Laterallus jamaicensis coturniculus</i> ST and FP	An elusive and seldom seen marsh bird. Occurs in tidal saltwater marshes dominated by pickleweed, cordgrass, and bulrush, and low-elevation freshwater marshes. Primarily occurs in marshlands around San Francisco Estuary and recently discovered (1994) in Sierra foothills. Constructs	<b>Not present.</b> Suitable habitat not present within the project site. Last sighting was made in 1901 within a mile of the preserve.

**Exhibit B. Special-status wildlife species evaluated for potential to occur in Roy's Redwoods Restoration Project Area.**

	woven cup nest near ground. Consumes insects, seeds, and small crustaceans.	
California least tern <i>Sterna antillarum browni</i> FE/SE	Occurs along the Pacific coast from San Francisco to Baja California. Typically along sandy beaches close to shallow water.	<b>Not present.</b> Suitable habitat is not present within the project site.
California Ridgway's rail <i>Rallus obsoletus obsoletus</i> FE/SE and FP	This gray-and-rusty rail lives in saltmarsh habitat with extensive, dense vegetation where it feeds on crustaceans, fish, vegetation, seeds, and aquatic invertebrates: snails, beetles, crickets, larvae, grasshoppers, etc. Males build bulky platform nests with ramps in clumps of vegetation or shrubs, from a few inches to four feet off the ground to avoid high tide. Females lay 3-14 eggs.	<b>Not present.</b> Suitable habitat is not present within the project site.
California spotted owl <i>Strix occidentalis occidentalis</i> BCC	Occurs in the southern Cascade Range in northern California, through the Sierra Nevada, across the Transverse and Peninsular Ranges in southern California, and up the Coast Range through Monterey County. They breed and roost in forests and woodlands with large old trees and snags, dense canopies with multiple layers, and downed woody debris. Large, old trees are the key component for their habitat. They prey on small to medium-sized mammals.	<b>Not present.</b> This project site is outside the range of this subspecies. However, the northern spotted owl ( <i>S. o. caurina</i> ) may occur within the project site.
Marbled murrelet <i>Brachtramphus marmoratus</i> FT/SE (nesting)	Uncommon permanent resident of the west coast from California to Alaska. This species is a permanent resident along the Marin Coast, but sightings are uncommon during the breeding season from May through July. This seabird forages for small fish and plankton in offshore areas and along the rocky coastline. It has an unusual nesting behavior. Unlike most alcids, it does not nest in burrows or cliff colonies, but uses old-growth forests dominated by conifers and redwoods. Nesting may occur as far as 45 miles inland. A single egg is laid on a platform of lichen and moss on large tree limbs. Adult movements to and from the nest occur most often at dusk and dawn. Breeding success is very low. The decline of this species has been attributed to the loss of old-growth forests.	<b>Not likely to occur.</b> Outside normal nesting range. Suitable nesting trees may be present within the project site but available records and historic occurrences show no sightings of marbled murrelets at inland locations in Marin County. No trees are proposed for removal..
northern spotted owl	Dense forest habitats in northern California. Requires multi-layered canopy cover for roosting sites. Breeding sites include tree or snag cavities or broken tops of large trees. Nocturnal hunter eating mostly	<b>Present.</b> These owls have not been documented nesting within the project site since monitoring began across the Preserve in 2004. However, a recent nest (in 2020) is located 1,300 feet southwest of the

**Exhibit B. Special-status wildlife species evaluated for potential to occur in Roy's Redwoods Restoration Project Area.**

<p><i>Strix occidentalis caurina</i> FT/ST</p>	<p>small mammals. Permanent year-round resident in Marin County where it is known from breeding occurrences in old-growth and mixed forest habitats.</p>	<p>project site. It is likely the owls use the project site for roosting and foraging.</p>
<p>Nuttall's woodpecker <i>Picoides nuttallii</i> BCC</p>	<p>This small black and white woodpecker is a year-round resident in California, ranging from northern California southward to northwestern Baja California. They are found primarily in oak woodlands but will also use wooded suburban areas and woodlands near streams. They mainly feed on insects such as beetles, larvae, ants, and termites and occasional berries. They excavate a new nesting cavity every year where the female will lay 3-6 eggs. Their breeding season is April through mid-July.</p>	<p><b>Low potential to occur.</b> Project site includes limited marginally suitable riparian habitat. Species has been documented just outside the preserve and the project site.</p>
<p>oak titmouse <i>Baeolophus inornatus</i> BCC</p>	<p>Small, gray-brown bird of oak woodlands. Characterized by small pointed crest and nasal tsick-a-dee-dee call that resonates through woodland habitats. Forages for insects and seeds, hopping from branch to branch. Nests in cavities in trees or nest boxes. Oak titmice are a year-round resident in Marin County.</p>	<p><b>Moderate potential to occur.</b> Small amount of suitable habitat present within the project site.</p>
<p>Rufous hummingbird <i>Selasphorus rufus</i> BCC</p>	<p>Rufous hummingbirds are fairly small hummingbirds. Males have bright orange on their back and belly, with a vivid iridescent-red throat. They typically breed in open or shrubby areas in the Northwestern United States. They feed primarily on nectar from colorful, tubular flowers and get protein and fat from eating insects, particularly gnats, midges, and flies. This hummingbird is most likely to be present in California in the March and April months as it migrates south.</p>	<p><b>Moderate potential to occur.</b> Small amount of suitable habitat present within the project site for migratory hummingbirds.</p>
<p>saltmarsh common yellowthroat <i>Geothlypis trichas sinuosa</i> BCC/SSC</p>	<p>The common yellowthroat is a widespread migrant breeding throughout California. The subspecies <i>sinuosa</i> is endemic to the San Francisco Bay region. It occurs in salt marshes, riparian thickets, and wetlands. Nests are constructed close to the ground or water. They feed primarily on insects.</p>	<p><b>Not present.</b> Suitable habitat is not present within the project site.</p>
<p>San Pablo Song Sparrow <i>Melospiza melodia samuelis</i> BCC/SSC</p>	<p>The song sparrow is a widespread, permanent resident songbird of Marin County. This subspecies occurs in the saltwater marshes around San Pablo Bay and northern San Francisco Bay. This species breeds from March to July in wetland gum plants (<i>Grindelia</i> spp.).</p>	<p><b>Not present.</b> Suitable habitat is not present within the project site.</p>

**Exhibit B. Special-status wildlife species evaluated for potential to occur in Roy's Redwoods Restoration Project Area.**

Spotted towhee <i>Pipilo maculatus clementae</i> BCC	This bird is a year-round resident in California. They prefer areas with dense shrub cover and leaf litter to scratch in, such as dry thickets, brushy tangles, forest edges, old fields, shrubby backyards, chaparral, coulees, and canyon bottoms. They eat mainly insects and arthropods but also acorns, berries, and seeds. Their nests are usually close to the ground in a clumps of grass or at the base of a shrub. The female can lay 2-6 eggs. Their breeding season is mid-April through mid-July.	<b>Moderate potential to occur.</b> Small amount of suitable habitat present within the project site.
Tricolored blackbird <i>Agelaius tricolor</i> BCC/SCC (nesting colony)	Colonial-nesting bird in fields, pastures, and wetlands. Nests in tules, cattails, and to a lesser degree willow and brambles. Breeding occurs from mid-April into late July. Typically forage on the ground in large flocks. Year-round resident in Marin County, more common in winter. Breeding distribution within the county is limited.	<b>Not present.</b> Suitable habitat is not present within the project site.
western snowy plover <i>Charadrius nivosus nivosus</i> FT/SSC	Small shorebird that occupies sandy beaches, sand spits, tidal estuaries, bayshore sandflats, and salt-evaporation ponds. They take small invertebrates by utilizing a run-and-stop foraging technique. Breeding occurs from early March through late September. Nests consist of shallow scrapes or depressions in sand. Plovers are a year-round resident of Marin County. A small number of plovers have been reported breeding at a salt evaporation bound in south county (Berner et al 2003).	<b>Not present.</b> Suitable habitat is not present within the project site.
wrentit <i>Chamaea fasciata</i> BCC	A year-round resident in coastal scrub and chaparral along the West Coast. Further inland it resides in thick shrublands in the foothill and desert regions of California. They eat a variety in insects, spiders, larvae, caterpillars, and berries with poison oak seeds being an important food source during the winter. They strip bark from trees and shrubs to weave nests and line them with grass and lichen before the female will lay 1-5 eggs. The breeding season is from March through August.	<b>Not present.</b> Suitable habitat is not present within the project site.
<b>Mammals</b>		
American badger <i>Taxidea taxus</i>	Occur in a variety of habitat types (e.g., herbaceous, shrub, or forest habitats) with dry, friable soils. Badgers are carnivorous and dig their own burrows. Consume primarily fossorial rodents but will also eat reptiles,	<b>Not present.</b> Most recent historic (1950) record of occurrence 7.5 miles from project site. Key habitat components are absent from the project site.

**Exhibit B. Special-status wildlife species evaluated for potential to occur in Roy's Redwoods Restoration Project Area.**

--/SSC	insects, eggs, birds, and carrion. They are active year-round, although less active in winter. Mating occurs in summer and early fall with young (average 2 to 3) born in early spring.	
hoary bat <i>Lasiurus cinereus</i> Western Bat Working Group – high priority species	Occurs in open habitat or habitat mosaics. Requires medium to large trees for cover and habitat edges and/or open areas for foraging habitat. Tend to be solitary roosting in trees and foliage. Widespread in California except patchy in desert regions.	<b>High potential to occur.</b> Suitable roosting and foraging habitat for bats is present within the project site and larger Preserve. Hoary bats are reported within several miles of Preserve. There is a collection from 1935 near Nicasio within 2.5 miles of the project site. There is a collection from 1948 near Phoenix Lake within 5.4 miles and additional sightings in Marin County near Point Reyes.
pallid bat <i>Antrozous pallidus</i> --/SSC Western Bat Working Group – high priority species	Grassland, shrubland, forest, and woodland habitats at low elevations up through mixed coniferous forests. A social species forming small colonies. Roosting sites include caves, mines, crevices, buildings, and hollow trees during day, more open sites used at night. At low elevations, locally common in California.	<b>High potential to occur.</b> Suitable roosting and foraging habitat for bats is present within the project site and larger Preserve. Pallid bats are reported within several miles of Preserve; there is a collection from 1892 that spanned the current Preserve. In 2001, there was a maternity colony reported in Gallinas Valley, 4 miles to the east of the project site. There are additional pallid bat sightings within 5-10 miles of the project site.
Point Reyes mountain beaver <i>Aplodontia rufa phaea</i> SSC	These beavers are 10–12 inches (27–30 cm) long with a very short tail, less than one-half inch (1 cm) long. They live in underground burrows typically dug in dense thickets or in forest openings. The presence of burrow openings is often the most obvious evidence of mountain beaver activity. Typically, there are multiple openings, 6–7 inches (15– 18 cm) in diameter, in an area of about 150–170 square feet (14–16 square meters). The subspecies is endemic to western Marin County, almost entirely within Point Reyes National Seashore. Here it is found on cool, moist, north-facing slopes in moderately dense coastal scrub. This scrub vegetation typically includes coyote brush as well as sword fern, bracken fern, poison oak, California nettle, and cow parsnip.	<b>Not likely to occur.</b> A limited extent of marginally suitable habitat present within project site but no signs of beaver activity were seen during the PCI survey. Historic (1981) record of occurrence 2.25 miles away.
Townsend's big-eared bat	Low to mid-elevation mesic habitats including riparian, mixed forest, coniferous forest, prairies, and agricultural lands. Utilizes edge habitat for foraging. Roosting sites include caves, mines, tunnels, buildings, and other	<b>High potential to occur.</b> Suitable roosting and foraging habitat for bats is present within the project site and larger Preserve. Townsend's big-eared bats are reported within several miles of Preserve; there is a sighting from 2016 within 4.5 miles of the project site and additional

**Exhibit B. Special-status wildlife species evaluated for potential to occur in Roy's Redwoods Restoration Project Area.**

<p><i>Corynorhinus townsendii</i> --/SSC Western Bat Working Group – high priority species</p>	<p>man-made structures. Occurs throughout California but distribution not well known.</p>	<p>sightings over 5 miles from the project site in Point Reyes National Seashore, Mount Burdell, Novato, Inverness, Angel Island, and Camp Eastwood.</p>
<p><b>Fish</b></p>		
<p>coho Salmon – central California coast ESU <i>Oncorhynchus kisutch</i> pop. 4 FE/SE</p>	<p>Coho salmon spend their adult life in the ocean, migrate up freshwater streams to spawn, rear at least partially in freshwater, and migrate to the ocean as juveniles. Unlike other Pacific salmon in California, their reproductive strategy is completed over a three-year cycle and is fairly rigid. Spawning years with relatively poor reproductive success can result in poor spawning runs three years later. They prefer cold, low gradient stream with dense riparian canopy. Adult coho salmon start to arrive in late summer and fall to begin acclimation to freshwater before they migrate upstream. Upstream migration is usually triggered by an increase in flow from a winter storm event and typically occurs in November and December with peak spawning activity in December and January. Coho die soon after spawning. Juvenile coho salmon emerge from the gravel the following spring and usually rear in the stream for one year before migrating to the ocean. Within the Russian River watershed, smolt emigration typically occurs from March through May.</p>	<p><b>Not present.</b> Salmonids cannot access upper Larsen Creek within the preserve or project site due to several passage barriers including a 9-foot-high bedrock ledge. Suitability of habitat is also low given its alluvial fan morphology and intermittent flows.</p>
<p>delta smelt <i>Hypomesus transpacificus</i> FT/SE</p>	<p>A small, short-lived fish of the Bay-Delta Estuary. Occupies habitats with a wide range of salinities, but prefers 2 to 7 ppt (parts salt per thousand parts water). Consumes primarily zooplankton but will take small insect larvae. Spawns in side channels and sloughs from February through July. Exhibits a one-year life cycle.</p>	<p><b>Not present.</b> Suitable habitat is not present within the project site.</p>

**Exhibit B. Special-status wildlife species evaluated for potential to occur in Roy's Redwoods Restoration Project Area.**

<p>steelhead-central California coast DPS</p> <p><i>Oncorhynchus mykiss irideus</i></p> <p>FT/--</p>	<p>Spawn in fresh water and mature at sea. Steelhead generally spend their first and sometimes second year of life in freshwater creeks and then one to four years at sea. They return to spawn in their natal streams as many as four times as they do not always die after spawning like other salmonids. Juvenile steelhead generally occupy glides and riffles and less frequently pools. Adult steelhead spawn from December through April in cool, clear, well-oxygenated streams with pea to apple-sized gravel, usually at the head of a riffle. Federal listing applies to all coastal runs from Russian River south to Soquel Creek; it includes San Francisco and San Pablo Bay basins but excludes the Sacramento-San Joaquin Rivers.</p>	<p><b>Not present.</b> Salmonids cannot access upper Larsen Creek within the preserve or project site due to several passage barriers including a 9-foot-high bedrock ledge. Suitability of habitat is also low given its alluvial fan morphology and intermittent flows.</p>
<p>tidewater goby</p> <p><i>Eucyclogobius newberryi</i></p> <p>FE/SSC</p>	<p>Small gray-brown fish, rarely exceeding 2-inches in length. Occupies, shallow coastal lagoons, brackish marshes, and lower stream reaches with still water along California coast. Breeding occurs in late-spring after sandbars close and conditions are favorable. Nests dug in the substrate. Gobies are an annual species. They feed on mostly small animals.</p>	<p><b>Not present.</b> Suitable habitat is not present within the Preserve.</p>
<p>Tomales roach</p> <p><i>Lavinia symmetricus ssp. 2</i></p> <p>SSC</p>	<p>Tomales roach are a small (adult size typically 50-100 mm SL, up to 120 mm SL), bronzy cyprinid with a trim, slender body, a somewhat pointed snout, a slender caudal peduncle and long fins. This species occurs in the western Marin County drainages of Lagunitas Creek and Walker Creek. They eat algae, insects, and crustaceans and breed in gravel beds or riffles. They are typically found in small warm streams but can survive in some cold larger streams.</p>	<p><b>Not present.</b> Outside known species range. Suitable habitat is not present within the Preserve.</p>
<p><b>Invertebrates</b></p>		
<p>California freshwater shrimp</p> <p><i>Syncaris pacifica</i></p> <p>FE/SE</p>	<p>A small, 10-legged crustacean occurring in low-elevation and gradient (less than 1%) perennial streams in Marin, Sonoma, and Napa counties. They occur in shallow pools away from the main current where they feed primarily on detritus and, to a lesser extent, on decomposing vegetation, dead fish, and invertebrates. Most shrimp appear opaque to nearly transparent with colored flecks across their bodies. Females can appear dark brown to purple under certain conditions. Breeding occurs in the autumn, but young do not hatch until the following May or early June. After breeding, female shrimp carry the fertilized eggs attached to their abdominal swimming legs throughout the winter. The freshwater shrimp</p>	<p><b>Not present.</b> Suitable habitat is not present within the project site.</p>

**Exhibit B. Special-status wildlife species evaluated for potential to occur in Roy's Redwoods Restoration Project Area.**

	has been extirpated from many streams and continues to be threatened by introduced predators, pollution, and habitat loss.	
Monarch butterfly – California overwintering population <i>Danaus plexippus</i> FC/--	Winters in coastal California where it utilizes wind-protected tree groves (e.g., eucalyptus, Monterey pine and cypress) along the coast. Roosts site typically located close to nectar and water sources.	<b>Not present.</b> Suitable habitat is not present within the project site.
Myrtle’s silverspot butterfly <i>Speyeria zerene myrtleae</i> FE	Historically, occupied coastal dune, prairie habitat, dunes, and bluffs from San Mateo County north to the Russian River in Sonoma County. Four remaining populations occur in western Marin County and southwestern Sonoma County. Similar in appearance and life history to Behren’s silverspot butterfly. Larvae typically feed on violets ( <i>Viola adunca</i> ) where eggs are laid. Adult flight season from late June to early September. Adults known to use a number of nectar plants [i.e., gum plant, yellow sand verbena, mints ( <i>Monardella</i> ssp.), seaside daisy, and nonnative bull thistle and false dandelion].	<b>Not present.</b> Suitable habitat is not present within the project site. Site is outside the known range of this species.
San Bruno elfin butterfly <i>Callophrys mossii bayensis</i> FE	Coastal, mountainous areas with grassy ground cover. All known locations restricted to San Mateo County. Larval host plant is Pacific sedum ( <i>Sedum spathulifolium</i> ). Adult flight season is late February to mid-April.	<b>Not present.</b> Suitable habitat is not present within the project site. There is one documented occurrence for this species in Marin County near Dillon Beach at an undisclosed time. The project is outside of the range of this species.

**Exhibit B. Special-status wildlife species evaluated for potential to occur in Roy's Redwoods Restoration Project Area.**

<p>western bumble bee <i>Bombus occidentalis</i> FC/Candidate for State Listing as Threatened or Endangered</p>	<p>This social bee is medium sized and short-tongued: queens 20-21 mm, workers 9-15 mm with three main color variants. Males (drones), females (sterile workers), and queens have different appearance. Generalist foragers on flower nectar and pollen. Habitat is varied including: open grassy areas, prairie, urban parks and gardens, sagebrush steppe, mountain meadows to alpine tundra. Nests underground, primarily in cavities and burrows such as old squirrel or other animal nests and in open west-southwest slopes bordered by trees, although a few nests have been reported from above-ground locations such as in logs among railroad ties. Queen constructs wax structures to lay eggs on. Mate in fall, queens overwinter in ground then in spring they emerge and find an appropriate nest site for the colony. Multiple broods laid over the course of the summer.</p>	<p><b>Not likely to occur.</b> Small amount of suitable habitat present within the project site. Historic (1977) record of occurrence approximately 3.5 miles away from site, but species believed extirpated from this portion of its historic range.</p>
---	--	--

Exhibit C: Roy's Redwoods  
Special-Status Plant Species  
Table

**Exhibit C: Special-status Plant Species Evaluated for Potential to Occur in the Roy's Redwoods Restoration Project Area**

<b>Scientific Name/Common Name</b>	<b>Listing Status USFWS/CDFW/ CRPR</b>	<b>Life Form, Blooming Period, and General Habitat</b>	<b>Potential for Species Occurrence</b>
<i>Agrostis blasdalei</i> / Blasdale's bent grass	--/--/ 1B.2	Perennial rhizomatous herb. Blooms May-July. Coastal bluff scrub, coastal dunes, coastal prairie. Sandy or gravelly soil close to rocks; often in nutrient-poor soil with sparse vegetation. 5-150 m.	Not Likely to Occur. No reported occurrences in vicinity. Only marginally suitable habitat present.
<i>Alopecurus aequalis</i> var. <i>sonomensis</i> / Sonoma alopecurus	FE/--/ 1B.1	Perennial herb. Blooms May-July. Freshwater marshes and swamps, riparian scrub. 5-365 m.	Not Likely to Occur. No reported occurrences in vicinity. Only marginally suitable habitat present.
<i>Amorpha californica</i> var. <i>napensis</i> / Napa false indigo	--/--/ 1B.2	Perennial deciduous shrub. Blooms April-July. Broadleafed upland forest (openings), chaparral, and woodland. 120-2000 m.	Not Present. Occurrences reported within 5 miles but no suitable habitat present within study area.
<i>Amsinckia lunaris</i> / bent-flowered fiddleneck	--/--/ 1B.2	Annual herb. Blooms March-June. Coastal bluff scrub, woodland, grassland. Typically on gravelly slopes, grassland, openings in woodland, often serpentine. 3-500 m.	Not Likely to Occur. Occurrences reported within 5 miles. Only marginally suitable habitat present.
<i>Calamagrostis</i> <i>crassiglumis</i> (= <i>C. stricta</i> <i>ssp. inexpansa</i> )/ <i>Thurber's reed grass</i>	--/--/ 2B.1	Perennial rhizomatous herb. Blooms May-July. Coastal scrub (mesic), freshwater marshes and swamps. 10-45 m.	Not Likely to Occur. No reported occurrences in vicinity. Only marginally suitable habitat present.
<i>Dirca occidentalis</i> / western leatherwood	--/--/ 1B.2	Perennial deciduous shrub. Blooms January-March. Broadleafed upland forest, closed-cone coniferous forest, chaparral, woodland, North Coast coniferous forest. 50-395 The m.	Not Likely to Occur. Reported occurrences within 5 miles and potentially suitable habitat present, but species not observed.
<i>Entosthodon kochii</i> / Koch's cord moss	--/--/1B.3	Moss. Woodland, on open soil. 180-1000 m.	Not Likely to Occur. Undated reported occurrence within 5 miles. Only marginally suitable habitat present. No detailed moss survey performed.
<i>Fissidens pauperculus</i> / minute pocket moss	--/--/ 1B.2	Moss. Damp coastal soil in North Coast coniferous forest. 10-1024 m. Most records known from seasonally moist, hard-packed silt-rich soils on steep faces, gullies or cut-banks in association with dense coniferous canopies.	Not Likely to Occur. No documented occurrences in vicinity. Marginally suitable habitat present, but no mosses observed in the typical microhabitat. No detailed moss survey performed.

Listing Status: FE-federally listed as endangered, FT-federally listed as threatened, FC-candidate for federal listing, SE-state listed as endangered, ST-state listed as threatened, Candidate SE-state candidate to be listed as endangered under CESA Candidate ST-state candidate to be listed as threatened under CESA, FP-State of California fully-protected species, SSC-California Species of Special Concern, and WL-Watch List. California Rare Plant Ranks include: 1A – Presumed extinct in California and rare/extinct elsewhere; 1B – Rare, threatened, or endangered in California and elsewhere; 2A – Presumed extirpated in California, more common elsewhere; 2B – Rare, threatened, or endangered in California, more common elsewhere; 3 - Plants for which we need more information; 4 – Plants of limited distribution. Suffixes: .1 Seriously endangered in California; .2 Fairly endangered in California; .3 Not very endangered in California

**Exhibit C: Special-status Plant Species Evaluated for Potential to Occur in the Roy's Redwoods Restoration Project Area**

<b>Scientific Name/Common Name</b>	<b>Listing Status USFWS/CDFW/CRPR</b>	<b>Life Form, Blooming Period, and General Habitat</b>	<b>Potential for Species Occurrence</b>
<i>Fritillaria lanceolata</i> var. <i>tristulis</i> / Marin checker lily	--/--/ 1B.1	Perennial bulbiferous herb. Blooms February-May. Coastal bluff scrub, coastal prairie, coastal scrub. 15-150 m. Taxonomy and subspecies status are subject of review.	Not Likely to Occur. Only marginally suitable habitat present.
<i>Fritillaria liliacea</i> / fragrant fritillary	--/--/ 1B.2	Perennial bulbiferous herb. Blooms February-April. Woodland, coastal prairie, coastal scrub, grassland (often serpentinite). 3-410 m.	Not Likely to Occur. Occurrence reported within 5 miles. Only marginally suitable habitat present.
<i>Helianthella castanea</i> / Diablo helianthella	--/--/ 1B.2	Perennial herb. Blooms March-June. Usually rocky, azonal soils, often in part shade. Broadleafed upland forest, chaparral, woodland, coastal scrub, riparian woodland, grassland.	Not Likely to Occur. No documented occurrences in vicinity. Only marginally suitable habitat present.
<i>Hemizonia congesta</i> ssp. <i>Congesta</i> / white seaside tarplant (congested-headed hayfield tarplant)	--/--/ 1B.2	Annual herb. Blooms April-November. Grassland, sometimes roadsides. 20-560 m.	Not Likely to Occur. Historic (1971) occurrence reported nearby. Potentially suitable habitat present but species not observed in PCI surveys and not listed in previous work on Preserve by S. Benson, CNPS, nor in VBMP.
<i>Holocarpha macradenia</i> / Santa Cruz tarplant	FT/SE/ 1B.1	Annual herb. Blooms June-October. Coastal prairie, coastal scrub, grassland (often clay, sandy). 10-220 m.	Not Likely to Occur. No documented occurrences in vicinity. Only marginally suitable habitat present.
<i>Horkelia tenuiloba</i> / thin-lobed horkelia	--/--/ 1B.2	Perennial herb. Blooms May-July. Broadleafed upland forest, chaparral, grassland (mesic openings, sandy).	Not Likely to Occur. Reported occurrence within 5 miles, but only marginally suitable habitat exists within project area.
<i>Kopsiopsis hookeri</i> / small groundcone	2B.3	Perennial rhizomatous herb (parasitic). Blooms April-August. Redwood forest, usually on salal, madrone, or bearberry.	Not Likely to Occur. No documented occurrences in vicinity. Few typical host plant species present.
<i>Leptosiphon acicularis</i> / Bristly leptosiphon	--/--/4.2	Annual herb. Blooms April - July. Grassland, woodland, and chaparral. 55-1500 m.	Not Likely to Occur. Potentially suitable habitat present in grasslands above grove but not within project site. Species not observed. Noted on either Roy's Redwoods or Maurice Thorne Preserve by Follette et al. 1986; noted as on Roy's Redwoods by VBMP. Not observed by S. Benson.

**Exhibit C: Special-status Plant Species Evaluated for Potential to Occur in the Roy's Redwoods Restoration Project Area**

Scientific Name/Common Name	Listing Status USFWS/CDFW/CRPR	Life Form, Blooming Period, and General Habitat	Potential for Species Occurrence
<i>Lessingia hololeuca</i> / woolly-headed lessingia	--/--/ 3	Annual herb. Blooms June-October. Broadleaved upland forest, coastal scrub, lower montane coniferous forest, and grassland (clay /serpentinite). 15-305 m.	Not Likely to Occur. Strongly associated with serpentine, which is not present. Noted on either Roy's Redwoods or Maurice Thorneer Preserve by Follette et al. 1986; noted as on Roy's Redwoods by VBMP. Not observed by S. Benson.
<i>Lessingia micradenia</i> var. <i>micradenia</i> / <i>Tamalpais lessingia</i>	--/--/ 1B.2	Annual herb. Blooms July-October. Broadleaved upland forest, coastal scrub, lower montane coniferous forest, and grassland (serpentinite). 100-400 m.	Not Likely to Occur. Typically occurs in thin, gravelly soil of serpentine outcrops or roadcuts within chaparral or grassland. It is only known from four occurrences in the Mt. Tamalpais area. No serpentine or other suitable soil conditions are present.
<i>Microseris paludosa</i> / marsh scorzonella	--/--/ 1B.2	Perennial herb. Blooms April-June (rarely July). Closed-cone coniferous forest, woodland, coastal scrub, grassland. 5-300 m.	Not Likely to Occur. No documented occurrences in vicinity. Potentially suitable habitat present but species not observed.
<i>Pentachaeta bellidiflora</i> / white-rayed pentachaeta	FE/SE/ 1B.1	Annual herb. Blooms March-May. Woodland, grassland (often serpentinite). 35-620 m.	Not Likely to Occur. No documented occurrences in vicinity. Only marginally suitable habitat present.
<i>Pleuropogon hooverianus</i> / North Coast semaphore grass	--/ST/ 1B.1	Perennial rhizomatous herb. Blooms April-August. Wet, grassy usually shady areas, sometimes freshwater marsh; associated with forest environments. 10-671 m.	Not Likely to Occur. Reported occurrence south of Preserve, in roadside ditch and adjacent moist slope in evergreen forest. Potentially suitable habitat present but species not observed.
<i>Sidalcea calycosa</i> ssp. <i>Rhizomata</i> / Pt. Reyes checkerbloom	--/--/1B.2	Perennial rhizomatous herb. Blooms April-September. Freshwater marshes and swamps (near the coast). 3-75 m.	Not Likely to Occur. Reported occurrence within 5 miles. Only marginally suitable habitat present.
<i>Stebbinsoseris decipiens</i> / Santa Cruz microseris	--/--/ 1B.2	Annual herb. Blooms April-May. Open areas, sometimes serpentinite in broadleaved upland forest, closed-cone coniferous forest, chaparral, coastal prairie, and grassland. 10-500 m.	Not Likely to Occur. No documented occurrences in vicinity. Only marginally suitable habitat present.
<i>Trifolium amoenum</i> / two fork clover	FE/--/ 1B.1	Annual herb. Blooms April-June. Coastal bluff scrub, grassland (sometimes serpentinite). Open, sunny sites, swales. 5-415 m.	Not Likely to Occur. Very few known extant occurrences. No reported occurrences in vicinity. Potentially suitable habitat present, but species not observed.