

FINDING OF NO SIGNIFICANT IMPACT ROAD IMPROVEMENT AND MAINTENANCE PROJECTS

**National Park Service, U.S. Department of the Interior
Point Reyes National Seashore
October 2014**

INTRODUCTION

The Finding of No Significant Impact (FONSI) has been prepared, in accordance with the National Environmental Protection Act (NEPA), for the Point Reyes National Seashore Road Improvement and Maintenance Projects in Marin County, California. The FONSI, along with the Environmental Assessment (EA), a determination of no impairment as required by the NPS Organic Act of 1916, and EA errata, comprise the complete record of environmental impact analysis for the project. This FONSI documents the decision of the National Park Service (NPS) to adopt a plan to rehabilitate and repave a total of 21.8 miles of road and adjacent parking areas in Point Reyes National Seashore. This program includes four separate road projects: Rehabilitation of portions of Limantour Road, Lighthouse Road, and Chimney Rock Road, and Pavement Preservation on 15 spur roads and 21 paved parking areas. The project includes upgrading road and parking surfaces and drainage features, installing new signs, striping the roads and parking areas, downsizing a beach-side parking area, and improving accessibility at two parking areas.

PURPOSE AND NEED FOR ACTION

The purpose of the proposed action is to provide safe driving surfaces for all travelers on national seashore roads and to reduce the possibility of road failures and to reduce maintenance costs, while at the same time, having little or no impacts to the adjacent environment and adhering to the management philosophy for visitor access as outlined in the *General Management Plan: Point Reyes National Seashore* (NPS 1980). The management philosophy, as described in the 1980 general management plan, is to “alleviate existing problems and minimize potential ones in the interest of making park access as pleasant, safe, and convenient as possible.”

The National Park Service has carried out partial and temporary repair projects over the years to keep the roads and parking areas operational and to meet the needs of the traveling public. The roads were originally unimproved dirt roads that were chip sealed and some roads have never had a full asphalt pavement surface installed. The roads and parking areas are now at an age where a comprehensive repair project is needed to ensure continued service for decades to come. They are deteriorating at an accelerated pace and may require vehicle restrictions or closures if not rehabilitated in the near future. The project roads and connected parking areas need to be rehabilitated and paved surfaces restored to extend their service life, and/or reduce long-term maintenance requirements.

The proposed action is needed because:

- If left untreated, the weathering and cracking of the project roads and parking surfaces could lead to pavement failure requiring increased maintenance and major repairs.
- A landslide damaged a 200-foot section of Limantour Road.
- Approaches to intersections on Limantour Road have sharp curves, steep profile grades, limited sight distance and minimal signage.
- Damaged or inadequately sized culverts on Limantour Road and Chimney Rock Road have caused and could cause substantial road damage.
- Drainage control issues on Chimney Rock Road have resulted in saturated road base and substantial damage to a road surface that is prone to failure because it is only a double chip seal on native material.
- Narrow travel lanes with limited and undersized passing locations on Chimney Rock Road force large buses to drive off the pavement.
- The Lighthouse and Chimney Rock parking areas lack pedestrian walkways and do not meet current accessibility standards.
- South Beach Parking area is oversized for the level of visitor parking needed for that area.

ALTERNATIVES

Selected Action

Based on the analysis presented in the EA, the National Park Service has selected the Proposed Action Alternative for implementation. This is the NPS proposed action alternative. The selected alternative was described on pages 13 to 28 of the EA.

Under the selected alternative, most construction work will be limited to the existing road and parking area prisms and drainage ditches. Work on the culverts, drainage ditches, pullouts, and road approaches may disturb vegetation and soil associated with wetlands outside the existing roadway. But construction boundaries will be established at these sites to help minimize the size of disturbed areas. Equipment and material staging and storage as well as construction vehicle turnarounds will be confined to the road, parking areas, and other previously disturbed areas. Construction will generally occur during the dry season (April 1 to October 31), but could occur all year weather permitting. Ground disturbing activities will be limited to the period from April 1 to October 31.

Additional specific restrictions will apply for special status species. Other best management practices will also be employed to help avoid or minimize impacts. Details about the construction methods and equipment to be used follow the description of the four road projects. Other best management practices will also be employed to help avoid or minimize impacts. They are identified in “Chapter 4: Environmental Consequences.”

Limantour Road Project. About 7.5 miles of the Limantour Road and 0.4 acres of parking areas will receive pavement preservation treatments. The road section to be improved is between Bear Valley Road and Limantour Beach Picnic Area Parking. The parking areas to be paved include Limantour Beach Trail Parking South, Limantour Residence Road West Parking, and Limantour Picnic Area Parking. The road work will include spot repairs, chip seal, and fog seal, then restriped. The improvements will also correct pavement and drainage problems, rebuild deficient curbing, remove and replace signs, and upgrade guard rails. For most of this road segment, the existing horizontal and vertical alignment will be maintained as a two-lane paved road with intermittent pullout areas. A 200-foot slide damaged road section will be reconstructed and repaved.

Drainage problems will be corrected with the replacement of failed or deficient culverts at 14 locations. An additional 10 obstructed culverts will be cleaned. Concrete box culverts will be used to replace culverts at two of the sites. Another five damaged culverts will be restored by slip lining the pipe. Erosion will be mitigated as much as possible by installing riprap or concrete headwalls near selected culverts.

Geocomposite underdrains will be installed at three sites where water accumulates. A total of 560 feet of obstructed drainage ditches parallel to the road will be reconditioned at 10 sites where water tends to accumulate and erosion is evident. Reconditioning will include removing vegetation and debris, reshaping, or repaving. Reshaped ditches may be widened to create a flatter bottom and change the slope. Ditch reconditioning will help storm water properly drain through these sections.

Lighthouse Road Project. About 1.5 miles of the Lighthouse Road between the Sir Francis Drake Boulevard intersection and Lighthouse Visitor Center will be improved to correct pavement and drainage problems on the road, roundabout, and parking area. Other improvements include removing and replacing signs, and upgrading guard rails. Near the parking area only, the existing horizontal and vertical alignment will be modified at the roundabout and driveway leading to a 38-space parking area. These changes will be made for accessibility to meet Architectural Barriers Act Accessibility standards and to accommodate shuttle busses. An area surrounding the parking area extending up to 20-feet beyond the existing pavement edge will be modified. The road will be chip sealed or microsurfaced, and restriped. The roundabout and the parking area sub base and pavement will be replaced. Sidewalks will be installed on the perimeter of the parking lot and the roundabout.

Drainage problems will be corrected with the replacement of drainage catch basins and installation of a culvert at the parking lot. Erosion will be mitigated by installing riprap near the culvert. About 40 feet of obstructed drainage ditches next to the road will be reconditioned at two sites. Reconditioning will include reshaping and removing vegetation and debris.

Chimney Rock Road Project. The 0.9 miles of the Chimney Rock Road between Sir Francis Drake Boulevard intersection and 120 feet east of the parking area will be rehabilitated. Rehabilitation will correct pavement and drainage problems, and improve the parking area to address accessibility to meet Architectural Barriers Act Accessibility standards and accommodate shuttle busses. The existing road surface will be removed and roadway re-graded to create a consistent 12-foot wide one-lane road. A new asphalt pavement surface will be applied to the road and 20-space parking area, and then restriped. Existing cattle guards will be cleaned. At existing wide spots in the road,

eight pullouts will be reconstructed with three paved with asphalt concrete and five surfaced with aggregate. A curb with narrow paved gutter will be added to the south side of the road where it is needed to minimize impacts to adjacent wetlands. Some reshaping of the cut-slopes along other sections will be necessary to establish sufficient shoulder and drainage ditch width and could impact existing vegetation along some sections of the road corridor.

Drainage problems will be corrected with the replacement of failed or deficient culverts at seven locations. Erosion will be mitigated as much as possible by installing riprap at culvert outlets. Geocomposite underdrains will be installed at three sites where water accumulates. A total of 470 feet of obstructed drainage ditches parallel to the road or parking area will be reconditioned at three locations. Reconditioning will include reshaping and removing vegetation and debris.

Improvements to the parking lot include paving and striping the parking area, adding a concrete sidewalk and a wood fence will be moved and reconstructed on part of the parking area perimeter to address accessibility problems.

Pavement Preservation Project. A total of 11.9 miles of road and 9.4 acres of parking area will be treated with chip and fog seal or microsurfacing to improve the pavement's durability and longevity. The roads and parking areas will be restriped. These treatments and staging will occur within the confines of the road prism and parking areas. The preservation treatment will postpone costly rehabilitation and reconstruction. In addition to Chimney Rock Road and parking area and Lighthouse Road and two parking areas, the following roads and parking areas will be treated:

- Park Headquarters Parking
- Bear Valley Visitor Center Parking
- Bear Valley Trailhead Road and Parking
- Bear Valley Headquarters Parking
- Bear Valley Building 77 Parking
- Limantour Beach Trail Access Road and Parking
- Limantour Residence Road West and Parking
- South Beach Road and Parking
- North Beach Road and Parking
- Drakes Beach Road and Parking
- McClure Beach Road and Parking
- Laguna Road and Laguna Trailhead Parking
- Chimney Rock Parking
- Bull Point Trailhead Parking Approach
- Abbots Lagoon Trailhead Parking
- Morgan Horse Ranch Road and Parking
- MCI Exhibit Parking
- Lighthouse Road and Visitor Parking
- North Operations Center Road and Parking
- Limantour Picnic Area Parking

- Cross Marin Trailhead Parking
- Bear Valley Maintenance Access Road
- Limantour Residence Road East and driveways
- Schooner Bay Road
- Estero Trailhead Road
- Mount Vision Road
- McClure Beach Access Road
- US Coast Guard Cemetery Road
- Commonweal Road
- Lifeboat Station Road
- Fish Dock (Mendoza) Road

In addition, South Beach parking area will be reduced from 73,000 square feet to 32,000 square feet by removing and recycling pavement from the north part of the lot. Part of the pavement removal area will be reshaped to create a swale for capturing stormwater runoff from the remaining parking area. Vegetative ground cover within the pavement removal area will be restored to more natural conditions using native plants.

Modifications to the Proposed Action (as described in the EA) Which are Incorporated in the Selected Action

Mitigation for off-setting wetland impacts was added to the selected alternative. The modification is included in the mitigation section below.

OTHER ALTERNATIVES CONSIDERED

No Action Alternative

The no action alternative would continue the present roadway management and condition. The no action alternative provided a basis for comparing the management direction and environmental consequences of the proposed action alternative. Under the no action alternative, the National Park Service would respond to future maintenance needs and conditions associated with the project roads and parking areas using common and approved repair protocols (e.g., asphalt patching, crack sealing, chip sealing, and/or asphalt overlay techniques). The National Park Service would continue to frequently repair and maintain the project roads and parking area with poor surface and subsurface drainage, damaged culverts, and insufficient road base. Temporary road closures for repairs would continue as needed.

Preliminary Options Considered and Dismissed

Add Dedicated Bike Lanes. Adding dedicated bike lanes to the project roads was considered to be outside the scope of this project. The road projects are intended to repair existing road and drainage features. Widening the roadways to accommodate a separate bike lane would be a major and costly construction project that could result in the roadway expanding into sensitive habitats. As a result,

this option was dismissed. But bike safety elements are included in the road rehabilitation plans, such as shared lane signs and markings, and improved line of sight.

Repair Sir Francis Drake Boulevard. The NPS road maintenance and improvement projects are a separate action from Marin County's Sir Francis Drake Boulevard resurfacing, restoration and rehabilitation project. Sir Francis Drake Boulevard, within the proposed project limits is owned and maintained by Marin County on an easement from the National Park Service. The Marin County and Federal Highway Administration are planning repairs and improvements to this road. But this project was too early in the planning phase to be evaluated. The public will have an opportunity to provide input on the Sir Francis Drake Boulevard road project in the near future.

Exclude Livestock. Excluding cattle from most of Chimney Rock Road by relocating cattle guards and adding fence along the north side of the road was considered. Livestock grazing in Point Reyes National Seashore is managed under special use permits. This option was dismissed because reconfiguring cattle grazing allotments is outside the scope of this road project.

Realign Chimney Rock Road to Avoid Wetlands. The planning team considered a design that eliminated the underdrain and shifted a section of the Chimney Rock Road north away from affected wetlands. However, this design was rejected because it wouldn't completely avoid the adjacent wetlands and would require a substantial reshaping of the road prism that would disturb a much larger area of roadside vegetation compared to the selected alternative. Under the selected alternative, the new underdrain along Chimney Rock Road is considered critical for eliminating problems caused by water saturation of the road base and maintaining the long-term stability of the road surface. The National Park Service and Federal Highway Administration compared mapped wetlands to the proposed road designs and determined that the wetlands delineated and mapped in 2013 were avoided to the extent possible.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

In accordance with the DO-12 Handbook, the NPS identifies the environmentally preferable alternative in its NEPA documents for public review and comment [Sect. 4.5 E(9)]. The environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative (43 CFR 46.30).

The NPS proposed action alternative is also the Environmentally Preferable Alternative for this project because the road improvements will reduce park maintenance needs and costs, improve public safety, and enhance the visitor experience at Point Reyes National Seashore. In addition, the selected alternative will preserve important historic, cultural, and natural resources by conducting all construction activities within the existing roadways and parking areas. This will eliminate and minimize impacts to important park resources

MITIGATION

Mitigating measures shall be employed to reduce or avoid adverse effects of the actions proposed in the alternatives. The NPS and FHWA project managers (PMs) will ensure that the project remains confined within the parameters established in the compliance documents and that mitigation measures will be properly implemented and enforced. Park resource specialists or qualified resource specialists will be responsible for monitoring project activities and affected areas in accordance with the following mitigation measures.

The construction contractor will be required to carry out specific environmental protection measures stipulated in the Special Contract Requirements for the proposed action. These contract requirements amend and supplement the *Standard Specifications for Construction of Roads and Bridges, on Federal Highway Projects, FP-14*.

The environmental protection measures required for the four road projects and responsible parties are summarized below.

General Mitigation

Responsible Party

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| <ul style="list-style-type: none">• Staging and storage areas for construction vehicles, equipment, material and soil will be sited in previously disturbed or paved areas approved by the National Park Service. These areas will be outside of high visitor use areas and will be clearly identified in advance of construction. | <ul style="list-style-type: none">• FHWA &NPS PMs• Contractor• NPS-Resource Management (RM) |
| <ul style="list-style-type: none">• All tools, equipment, barricades, signs, and surplus materials will be removed from the project area upon project completion. Construction debris will be immediately hauled from the national seashore to an appropriate disposal location. | <ul style="list-style-type: none">• FHWA &NPS PMs• Contractor |
| <ul style="list-style-type: none">• A Hazardous Spill Plan or Spill Prevention, Control and Countermeasures Plan, will be in place, with actions to be taken in the event of a spill, notification measures, and preventative measures, such as the placement of refueling facilities, storage, and handling of hazardous materials, and provisions for the containment and disposal of contaminated soils. The plan will be submitted to the National Park Service at least 14 days before beginning construction. | <ul style="list-style-type: none">• FHWA &NPS PMs• Contractor |
| <ul style="list-style-type: none">• To revegetate disturbed upland and wetland areas, treatments will include grading to natural contours, replacing stockpiled topsoil, mulching, and replanting or reseeding with native plants from the watershed or nearby watersheds under guidance of NPS biologists. | <ul style="list-style-type: none">• FHWA &NPS PMs• Contractor• NPS-RM |
| <ul style="list-style-type: none">• Reclaimed disturbed areas will be monitored for up to three years after construction to determine if remedial actions such as installation of erosion-control structures, nonnative plant species control, or replacement planting are necessary. Treatment of nonnative vegetation will be completed in accordance with Director's Order 13: Integrated Pest Management Guidelines. | <ul style="list-style-type: none">• NPS-RM |

- Clean Water Act permits from the U.S. Army Corps of Engineers and Regional Water Quality Control Board will be obtained for the Limantour Road and Chimney Rock Road projects because they will affect Waters of the U.S. (including wetlands). Provision of these permits will be followed.
 - FHWA &NPS PMs
 - Contractor
 - NPS-RM
- To offset permanent impacts of up to 0.072 acres of wetlands, the National Park Service and Federal Highway Administration will develop a series of Best Management Practices (BMPs) which the construction contractor will use to enhance each of the repair sites affecting wetlands. Depending on the affected wetland site, the BMPs could include: a) removing invasive plants; b) using a native plant mix to restore native wetland vegetation; c) restoring natural contours to encourage wetland development; d) placing downed woody debris near the culverts to restore instream and wetland cover; and e) shaping a natural stream channel profile near the culverts to restore pools and riffles.
 - FHWA &NPS PMs
 - Contractor

Natural Resources Mitigation

Responsible Party

- Construction zones outside existing disturbed areas will be delineated with flagging and all surface disturbing work will be confined to the construction zone. This mitigation does not exclude necessary temporary structures, including silt-control barriers.
 - FHWA &NPS PMs
 - Contractor
- To minimize air pollution, dust control will occur as needed on active work areas where dirt or fine particles are exposed. Operators will avoid leaving equipment and vehicles idling for more than five minutes when parked or not in use.
 - FHWA &NPS PMs
 - Contractor
- To prevent or reduce soil erosion and nonpoint source pollution in drainage areas during construction: (1) keep disturbed areas small to minimize erosion; (2) place waste and excess excavated materials outside drainages to avoid sedimentation; (3) install silt fences, temporary earthen berms, temporary water bars, sediment traps, stone check dams, or other equivalent measures prior to construction activities and removing these features after construction; (4) protect stockpiled soil and fill material from erosion with plastic sheeting, filter fabric, or other erosion control measures; (5) conduct regular site inspections during construction to ensure that erosion-control measures were properly installed and functioning effectively; and (6) store, use, and dispose of chemicals, fuels, and other toxic materials at least 100 feet from surface water, ditches, and other drainage features.
 - FHWA &NPS PMs
 - Contractor
- Only erosion-control materials made of tightly woven fiber netting or nonbinding materials (e.g., rice straw) will be used to ensure that small animals do not become trapped.
 - FHWA &NPS PMs
 - Contractor

- To minimize introduction or spread of invasive or non-native plant species, the contractor will: (1) minimize soil disturbance; (2) thoroughly clean and inspect all construction equipment and materials before entering the national seashore; (3) cover fill material in haul trucks entering the park; (4) limit vehicle parking to existing roadways, parking lots, access routes or previously disturbed sites approved by the National Park Service; (5) limit heavy equipment to the roadway and within construction limits; and (6) obtain all sand, rock, gravel and erosion-control materials from NPS approved sources that are free of weeds and non-degradable contaminants.

 - FHWA &NPS PMs
 - Contractor
 - NPS-RM

- Before construction begins, the National Park Service will survey for rare California plants in areas where they may occur within the vegetated construction zones. Surveys for state and locally (California Native Plant Society) listed plants that may be in the project area will be conducted at appropriate times. If state or locally listed plants are found and can't be avoided, then seeds would be collected and plants propagated before revegetating disturbed areas. Revegetated areas with rare plants will be monitored to up to three years and remedial actions taken to ensure that rare plants are reestablished.

 - FHWA &NPS PMs
 - NPS-RM

- All work will be carried out in accordance with the applicable terms and conditions stipulated in the Biological Opinions (USFWS 1999, 2003) for Section 404 permitted and Federal Highway Administration projects that may affect the California red-legged frog.

 - FHWA &NPS PMs
 - Contractor
 - NPS-RM

- Construction workers and supervisors will be educated about California red-legged frogs and other listed species before the project begins and as needed throughout the duration of the project as staff changes occur or as conditions warrant. The program will consist of a brief presentation by persons knowledgeable about the California red-legged frog and other listed species. Emphasis of the education program will be on identification of the species, Endangered Species Act requirements for protecting listed species and critical habitat, and the measures being taken during the project to reduce adverse impacts. A fact sheet describing all information included in the education program will be distributed to all staff and personnel entering the work area.

 - FHWA &NPS PMs
 - NPS-RM

- To protect non-breeding dispersing or aestivating California red-legged frogs where they could potentially occur, a qualified USFWS-approved biologist will survey areas where California red-legged frogs occur during three night surveys prior to start of any construction or preparation activities. One of these surveys will take place no later than 48 hours prior to construction.

 - FHWA &NPS PMs
 - NPS-RM

- If California red-legged frogs are detected before July 31, a 100-foot buffer would be established around the detection location. If frogs are found after July 31, then all construction work would cease until the individual(s) have left the area.

 - FHWA &NPS PMs
 - NPS-RM

- If any life stage of the California red-legged frog is discovered by the on-site biologist or anyone else, all construction work in that area of the project site would cease and not restart until a qualified USFWS-approved biologist has determined that the individuals have left the area. If the individuals remain in the construction area for an extended period, then the National Park Service would contact the U.S. Fish and Wildlife Service for further guidance.

 - FHWA &NPS PMs
 - NPS-RM

- To prevent inadvertent entrapment of California red-legged frog during construction, the on-site biologist or construction foreman will ensure that all excavated, steep-walled holes or trenches more than one foot deep are completely covered at the close of each work day with plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks and inspected by the on-site biologist. In addition, all on-site construction pipes, culverts or similar structures in which frogs might take refuge during the construction period will be securely capped prior to storage on-site or will be inspected by a qualified USFWS-approved biologist for California red-legged frogs prior to being moved. Before any holes are filled, they will be thoroughly inspected for trapped animals by a qualified biologist.

 - FHWA &NPS PMs
 - NPS-RM
 - Contractor

- To avoid construction noise impacts to Northern spotted owls, no construction work will occur on Limantour Road between Bear Valley Road and Sky Trail Parking intersections (near culvert 187+68) during the owls breeding season between February 1 and August 1.

 - FHWA &NPS PMs
 - NPS-RM
 - Contractor

- To avoid construction noise impacts to snowy plovers, no work will occur on North Beach and South Beach parking areas near western snowy plover designated critical habitat between March 1 and September 15. However, construction work could be allowed during this period if the park biologists determine that no plovers are nesting near the construction area based on annual plover monitoring.

 - FHWA &NPS PMs
 - NPS-RM
 - Contractor

- To avoid impacting Myrtle's silverspot butterfly, no larval host plants (western dog violet) will be disturbed in areas where Myrtle's silverspot butterfly are known to occur.

 - FHWA &NPS PMs
 - NPS-RM
 - Contractor

Cultural Resources Mitigation

Responsible Party

- If, during construction, archeological resources are discovered, all work in the immediate vicinity of the discovery would be halted until the resources are identified by a NPS archeologist. If it is determined that the archeological resources are important, they would be documented and an appropriate mitigation strategy developed, if necessary, in consultation with the California SHPO.

 - FHWA &NPS PMs
 - NPS- Cultural Resources (CR)
 - Contractor

- Should human remains, funerary objects, sacred objects, or objects of cultural patrimony be discovered during construction, park staff would follow provisions outlined in the Native American Graves Protection and Repatriation Act of 1990.

 - FHWA &NPS PMs
 - NPS-CR
 - Contractor

- Paleontological remains and archeological specimens found within the construction area would only be removed by the National Park Service or by NPS-designated representatives.
 - FHWA &NPS PMs
 - NPS-CR
 - Contractor
- Avoid impacts to archeological resources through contract language requiring the construction contractor to attend preconstruction meetings with park archeologists to develop archeological site protection and avoidance measures. The plan will be documented in an archeological monitoring and inadvertent discovery plan, which will outline areas that will undergo archeological monitoring during construction, and will designate who would perform the monitoring.
 - FHWA &NPS PMs
 - NPS-CR
 - Contractor
- Four archaeological resources were identified; CA- MRN-661H, CA-MRN-277, CA-MRN-278, and CA-MRN-378. To avoid impacts to archeological resources, these sites will be avoided by all construction activities and temporary fencing will be installed along the roadside to ensure no construction activity or staging of equipment will occur within the site boundaries and an archeological monitor will be on site during construction in these areas.
 - FHWA &NPS PMs
 - NPS-CR
 - Contractor

Visitor Traffic and Park Operations Mitigation

Responsible Party

- Contractors will coordinate with national seashore staff to reduce disruption during peak visitation or special events, and normal park activities. Equipment will not be stored along the roadway overnight without prior approval from national seashore staff. Construction workers and supervisors will be informed about special sensitivity of park values, regulations, and appropriate housekeeping.
 - FHWA &NPS PMs
 - Contractor
- During peak visitation periods and special events, one lane of traffic will remain open to the extent practicable and traffic delays will be limited to 30-minutes.
 - FHWA &NPS PMs
 - Contractor
- Temporary road closures for installing culverts or replacing road surfaces will be limited to off-peak recreational traffic periods (i.e., road closures will be avoided on weekends and holidays).
 - FHWA &NPS PMs
 - Contractor
- Delays for emergency response vehicles will be kept to a minimum by having the emergency responders notify the traffic monitors via the national seashore radio/frequency immediately when the vehicle is dispatched, thus allowing approximately 10 minutes to clear the road before the arrival of the emergency vehicle. Emergency response providers and the contractor will need to coordinate on any road closures (e.g., it may be necessary to temporarily stage emergency vehicles on both sides of a road closure).
 - FHWA &NPS PMs
 - Contractor

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

Scoping

Public scoping comments were used to assist the planning team develop a range of reasonable and feasible project alternatives that meet the purpose and need, including a no action alternative, and then analyzing the environmental impacts of each alternative in the environmental assessment. A 30-day public scoping period for the Point Reyes National Seashore Road Improvement and Maintenance projects was conducted from July 30, 2013 through August 31, 2013. Public scoping notices announcing the project were mailed and posted on the NPS Planning, Environment, and Public Comment system at <http://parkplanning.nps.gov/poreroadsea> on July 30, 2013. Notices were also published in local newspapers, including Marin News (8/11/2013) and Pacific Sun (8/12/2013). Comments were invited for submission by mail and on-line through the Planning, Environment, and Public Comment system. During the scoping period, 12 correspondences were received.

Public Review and Comment Period

The *Road Improvement and Maintenance Projects Environmental Assessment* formal public review period occurred from July 17th through August 18th, 2014. Letters notifying the public that the EA was available at <http://parkplanning.nps.gov/poreroadsea> were sent to 333 individuals, organizations, or government agencies. A CD with the EA and cover letter were sent to 14 Point Reyes National Seashore Association board members. The printed EA was sent to seven libraries. A news release announcing the availability of the EA was posted on the national seashore's website on July 16, 2014. During the public review period, eight correspondences were received.

Agency Consultation

Section 106 of the NHPA and Tribal Consultation. The National Park Service began consultation with the California State Historic Preservation Officer (SHPO) and park affiliated tribes on November 8, 2012. The SHPO (August 7, 2013) and the California Sacred Sites Protection Committee of the Federated Indians of Graton Ranchera (October 10, 2012), concurred that the project proposed constitutes an undertaking and concurred with the National Park Service finding of “no adverse effect. SHPO also agreed that the Area of Potential Effect is sufficient to take effects into account. The SHPO also does not object to assuming eligibility for the two unevaluated sites and finds identification and evaluations efforts to be sufficient.”

U.S. Army Corps of Engineers. The National Park Service is coordinating with the U.S. Army Corps of Engineers regarding wetland permitting for the Limantour Road and Chimney Rock Road repair projects. The National Park Service will submit a Clean Water Act section 404 wetland fill permit application to the U.S. Army Corps of Engineers for the road projects because planned construction activities will affect waters of the U.S.

U.S. Fish and Wildlife Service. The National Park Service began informal consultation on this project with the U.S. Fish and Wildlife Service on January 8, 2013. The National Park Service obtained a list of federally listed endangered and threatened species that may be present near the

project roads from the U.S. Fish and Wildlife Service. The list was used as the basis for the special status species analysis in the EA.

This EA served as the biological assessment (BA) for the selected alternative. Based on the analysis in the EA/BA, the National Park Service has determined that the proposed action is not likely to adversely affect federally listed species or critical habitat within the project areas. The National Park Service submitted the EA/BA to the U.S. Fish and Wildlife Service with a letter (July 17, 2014) requesting their review and concurrence with this determination. The U.S. Fish and Wildlife Service concurred with a “not likely to adversely affect” determination, fulfilling section 7 consultation requirements on September 24, 2014.

California State Clearinghouse. The California State Clearinghouse functions as the “State Single Point of Contact” for coordinating state and local review of federal environmental documents. The purpose of the process is to afford state and local participation in federal activities occurring within California. The National Park Service submitted an initial scoping letter describing the project to the State Clearinghouse. Their response indicated that “no state agencies submitted comments.”

The National Park Service also submitted 15 copies of the EA with the Notice of Completion and Environmental Document Transmittal form to the Clearinghouse on July 15, 2014 for distribution to selected state agencies for their review and comment by August 15, 2014. The EA was sent to: California Coastal Commission; Department of Fish and Wildlife, Region 3; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 4; Air Resources Board; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 2; Native American Heritage Commission; and State Lands Commission. The California State Clearinghouse sent a letter on August 18, 2014 to Point Reyes National Seashore indicating that “no state agencies submitted comments by this date” and that the National Park Service has complied with the State Clearinghouse review requirements.

California Coastal Commission. The National Park Service has been consulting with the commission about this project since January 2014. The EA served as the coastal consistency determination for the proposed action alternative. Based on the analysis in the EA, the National Park Service determined that the road improvement and maintenance projects at Point Reyes National Seashore would not negatively affect the marine environment, land resources, and other resources covered under the Coastal Zone Management Act. The National Park Service submitted the EA to the California Coastal Commission with a letter (July 17th, 2014) requesting their review and concurrence with this negative determination. The Commission requested additional information about project impacts on wetlands (July 31, 2014 email from Joseph Street to Steve Culver). The National Park Service addressed their request in an email (September 11, 2014 email from Steve Culver to Joseph Street). The California Coastal Commission concurred with the NPS negative determination, fulfilling Coastal Zone Management Act requirements on September 16, 2014.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR § 1508.27, significance is determined by examining the following criteria:

1) Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS.

The primary impact topics identified in the environmental analysis and documented in the environmental assessment included: vegetation, wetlands, special status species, historic properties, visitor experience and safety. Impacts to these resources were identified at the negligible to minor level. No major adverse or beneficial impacts were identified that will require analysis in an environmental impact statement.

2) The degree to which public health and safety are affected.

The mitigation measures described above will be implemented to ensure the safety of the travelling public during construction. Upon completion of the selected alternative (action), the improved road and parking surfaces, widened intersection approaches, paved turnouts, added signage, and repaired road drainage features would all improve driving conditions and road safety resulting in long-term beneficial impacts.

3) Any unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, and so forth).

The environmental assessment examined in detail the unique characteristics of the area potentially affected by the selected alternative including historic properties, critical and sensitive areas for threatened, endangered, or rare species, and wetlands. Impacts to these resources were identified at the negligible to minor level.

4) The degree to which impacts are likely to be highly controversial.

There were no highly controversial effects identified during either preparation of the environmental assessment or the public review period.

5) The degree to which the potential impacts are highly uncertain or involve unique or unknown risks.

There were no highly uncertain, unique, or unknown risks identified during either preparation of the environmental assessment or the public review period.

6) Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.

The selected action neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

7) Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects. Significance cannot be avoided by terming an action temporary or breaking it down into small component parts.

The environmental assessment analyzed impacts of the selected action on vegetation, wetlands, special status species, historic properties, visitor experience and safety. As described in the environmental assessment, cumulative impacts were determined by combining the impacts of the selected alternative with other past, present, and reasonably foreseeable future actions. The selected action will not result in or contribute to cumulatively significant impacts.

8) The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.

Under the selected action, surface treatments to the roadways, parking lots and the removal of a section of the South Beach parking lot does not have potential to affect identified historic properties. The California State Historic Preservation Officer, and the California Sacred Sites Protection Committee of the Federated Indians of Graton Ranchera, concurred that the project proposed constitutes an undertaking and concurred with the National Park Service finding of “no adverse effect”.

9) The degree to which an action may adversely affect an endangered or threatened species or its habitat.

There are six federally listed threatened or endangered species and two state listed species with the potential to occur in or near the road project areas. The project roads are also near designated critical habitat for two of the federally listed species, the California red-legged frog and western snowy plover. In addition, there are at least 17 other rare plants listed as rare by the California Native Plant Society that are known to occur in vegetated areas potentially affected the road projects.

The implementation of mitigation measures that focus upon avoidance; limiting construction during breeding season; limiting area of disturbance; installing erosion and sediment control devices; restoring native vegetation immediately after construction; preconstruction surveys; construction monitoring; and post construction monitoring will help minimize impacts on these species. With mitigation, implementation of the selected action is not likely to adversely affect any federal, state, or local listed species. The U.S. Fish and Wildlife Service concurred with this determination for the federally listed species.

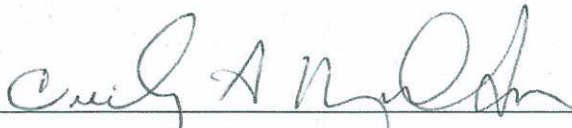
10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

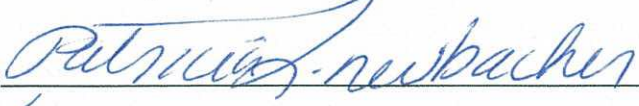

The selected alternative violates no federal, state, or local environmental protection laws.

FINDING OF NO SIGNIFICANT IMPACT

Our analysis per the EA combined with the capability of the mitigation strategies to avoid, reduce, eliminate impacts, and given due consideration for the minor nature of public comment, supports our finding that the selected actions do not constitute a major federal action which will significantly affect the quality of the human environment. Implementation will occur as soon as practicable. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this action and thus will not be prepared.

Recommended:  22 OCTOBER 2014
Cicely A. Muldoon, Superintendent Date
Point Reyes National Seashore

Approved:  10/27/14
 Christine S. Lehnertz, Regional Director Date
Pacific West Region, National Park Service

ROAD IMPROVEMENTS AND MAINTENANCE PROJECTS
POINT REYES NATIONAL SEASHORE

NON-IMPAIRMENT DETERMINATION

The National Park Service (NPS) has determined that implementation of the selected alternative will not constitute impairment to the resources or values of Point Reyes National Seashore. This conclusion is based on a thorough analysis of the environmental impacts described in *the Road Improvements and Maintenance Projects Environmental Assessment*, relevant scientific studies and cultural resource reports, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies 2006. The selected alternative will not result in major adverse impacts on a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation for Point Reyes National Seashore; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the park's general management plan or other relevant NPS planning documents.

This non-impairment determination has been prepared for the selected alternative described in the Finding of No Significant Impairment (FONSI), for the topics listed below. An impairment determination is not made for visitor experience, socioeconomics, public health and safety, environmental justice, land use, and park operations because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the 1916 Organic Act, and cannot be impaired in the same way that an action can impair park resources and values. Specific impact areas and the detailed analysis that led to the non-impairment determination are described below.

Findings on Impairment for Vegetation

Vegetation is part of a continuous diverse ecosystem within Point Reyes National Seashore that historically received little human use. Vegetation contributes to the national seashore significance as essential habitat for the sustained health of plant and animal communities, including many threatened, endangered, and rare species. The project roads traverse many plant communities including Douglas fir, coastal redwood, Bishop pine, hardwood forest, grasslands, wetlands, coastal scrub, and coastal dunes.

The replacement and repair of culverts, cleaning of ditches, installation of underdrains, and minor road and parking area realignments will temporarily impact 4.10 acres of roadside native vegetation and cause a permanent loss of up to 0.36 acres of existing roadside vegetation. Native vegetation on temporarily disturbed areas will be restored immediately after construction is completed. Mitigation measures to help protect vegetation, including weed control, will also be implemented. Reducing the South Beach parking footprint will also restore up to 0.94 acres of coastal vegetation. Road maintenance, roadside vegetation management, and cattle grazing will continue contribute to minor adverse effects on roadside vegetation. The impacts to a very small area of vegetation would not affect the integrity the national seashore's plant communities. Therefore, the selected alternative will not impair vegetation resources of Point Reyes National Seashore for future generations.

Findings on Impairment for Wetlands

Affected wetlands serve a variety of ecological functions including functions including maintenance and moderation of seasonal stream flows, maintenance of hydrophytic plants, production of organic matter, and habitat for wildlife. Wetlands also contribute to the national seashore's significance as important habitat for many rare plants and animals.

The replacement and repair of culverts, cleaning of ditches, installation of underdrains, and minor road and parking area realignments will cause a minor short-term adverse impact on 0.322 acres of wetland and long-term loss of up to 0.072 acres of existing wetlands. Wetlands on temporarily disturbed areas will be restored immediately after construction is completed. The National Park Service and Federal Highway Administration will develop a series of Best Management Practices (BMPs) which the construction contractor will use to enhance each of the repair sites affecting wetlands. This will generate varying degrees of ecological uplift at each site. The objective is to restore the function of the affected wetlands within the project area by at least 10% to offset the 0.072 acres of permanent impacts resulting in no net loss of wetlands. Mitigation measures to help protect wetlands will also be implemented. Road maintenance, roadside vegetation management, and cattle grazing will continue to contribute minor adverse effects on roadside wetlands. Restoration of affected wetlands and other mitigation measures will result in wetlands remaining in substantially similar condition and quantity as at present and the visitor experience of the wetlands will remain substantially the same. The selected alternative will not impair wetland resources in the national seashore.

Findings on Impairment for Special-Status Species

Maintaining the integrity of local populations of local, state, and federally-listed species and their habitat, is important because listed species are rare, have specialized habitat requirements, and because the national seashore serves as a refuge from surrounding habitat loss and alteration due to development pressure in the region. The presence and viewing of special-status species, such as the western snowy plovers, is a significant component to the visitor experience in the national seashore that is not commonly available in adjacent developed areas.

There are six federally listed threatened or endangered species and two state listed species with the potential to occur in or near the road project areas. The project roads are also near designated critical habitat for two of the federally listed species, the California red-legged frog and western snowy plover. In addition, there are at least 17 other rare plants listed as rare by the California Native Plant Society that are known to occur in vegetated areas potentially affected the road projects.

The implementation of mitigation measures that focus upon avoidance; limiting construction during breeding season; limiting area of disturbance; installing erosion and sediment control devices; restoring native vegetation immediately after construction; preconstruction surveys; construction monitoring; and post construction monitoring will help minimize impacts on these species. With mitigation, implementation of the selected alternative is not likely to adversely affect any federal, state, or local listed species. The U.S. Fish and Wildlife Service concurred with this determination for the federally listed species. Therefore, this alternative will not impair any special status species.

Findings on Impairment for Historic Properties

The 1980 General Management Plan for Point Reyes National Seashore calls for protection and preservation of significant historic and cultural resources within the unit. Three historic properties within the area of potential affect include the Shafter/ Howard Tenant Ranches Historic District, the Point Reyes Peninsula Indigenous Archaeological District, and the Point Reyes Lighthouse Station Historic Site.

Under the selected alternative, road rehabilitation work will be conducted in a manner to preserve the integrity of design characteristics and craftsmanship of structural features. Road rehabilitation will be conducted in accordance with the Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Treatments of Cultural Landscapes, including reuse of original material, repairing and replacing features in-kind, and using compatible designs when adding new designs. The surface treatments to the roadways, parking lots and the removal of a section of the South Beach parking lot does not have potential to affect identified historic properties. The California State Historic Preservation Officer, and the California Sacred Sites Protection Committee of the Federated Indians of Graton Ranchera, concurred that the project proposed constitutes an undertaking and concurred with the National Park Service finding of "no adverse effect". Therefore, the selected alternative will not impair historic properties and the cultural integrity of the national seashore.

CONCLUSION

As described above, the adverse effects and environmental impacts anticipated as a result of implementing the selected alternative will not rise to levels that impair resources or values whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation for Point Reyes National Seashore; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the park's general management plan or other relevant NPS planning documents.

ENVIRONMENTAL ASSESSMENT
ROAD IMPROVEMENTS AND MAINTENANCE PROJECTS
POINT REYES NATIONAL SEASHORE

ERRATA

The following changes or corrections were made to the *Road Improvements and Maintenance Projects Environmental Assessment* in response to comments on the EA.

The following text is added at the end of the “Environmental Protection” section on page 25.

- To offset permanent impacts to of 0.072 acres of wetlands, the National Park Service and Federal Highway Administration will develop a series of Best Management Practices (BMPs) which the construction contractor will use to enhance each of the repair sites affecting wetlands. Depending on the affected wetland site, the BMPs could include: a) removing invasive plants; b) using a native plant mix to restore native wetland vegetation; c) restoring natural contours to encourage wetland development; d) placing downed woody debris near the culverts to restore instream and wetland cover; and e) shaping a natural stream channel profile near the culverts to restore pools and riffles.

The following text replaces the paragraph under the “Repair Sir Francis Drake Boulevard” section on page 29.

Some commenters expressed concerns about the condition of sections of Sir Francis Drake Boulevard and suggested that this road also be repaired. Sir Francis Drake Boulevard is owned and maintained by Marin County on an easement from the National Park Service. The Marin County and Federal Highway Administration are planning repairs and improvements to this road. The National Park Service and Federal Highway Administration started planning the four NPS road projects in 2010, three years before the Sir Francis Drake Boulevard project was programmed for funding under the Federal Lands Access Program in 2013.

The following text replaces the last sentence in second column on page 55.

Under this excepted action a wetland Statement of Findings is not required.

SUMMARY OF PUBLIC AND AGENCY COMMENTS ON THE ROAD IMPROVEMENTS AND MAINTENANCE PROJECTS ENVIRONMENTAL ASSESSMENT

INTRODUCTION

The *Road Improvement and Maintenance Projects Environmental Assessment* formal public review period occurred from July 17th through August 18th, 2014. Letters notifying the public that the EA was available at <http://parkplanning.nps.gov/poreroadsea> were sent to 333 individuals, organizations, or government agencies. A CD with the EA and cover letter were sent to 14 Point Reyes National Seashore Association board members. The printed EA was sent to seven libraries. A news release announcing the availability of the EA was posted on the national seashore's website on July 16, 2014.

SUMMARY OF COMMENTS

A total of eight pieces of correspondence were received during the public comment period, including four pieces of correspondence from members of the public and four pieces of correspondence from state or federal agencies. All agencies provided their comments via letter. Public comments received were by letter, email, or entered directly into PEPC. A letter from the California State Clearinghouse indicated that no state agencies had comments. A list of state and federal agencies that provided comments is as follows:

Environmental Protection Agency (EPA)
California Coastal Commission
U.S. Fish and Wildlife Service (USFWS)

There were concerns about maintaining the current character of the roads while meeting road design standards, mitigating impacts on wetland to comply with the Clean Water Act, and improving road crossings for wildlife. There was also concern about the cumulative effects on visitors and wildlife when added to the impacts from Marin County's proposed Sir Francis Drake Boulevard rehabilitation project. Some comments were on items that were outside the scope of the EA. This includes comments that recommended constructing bicycle lanes, using impervious materials to pave the roads, installing photovoltaic panels, and providing charging stations for electric vehicles.

PUBLIC AND AGENCY COMMENTS AND RESPONSES

During review, comments were classified as substantive or non-substantive. The National Park Service has summarized both non-substantive and substantive comments below. A substantive comment is defined in the NPS Director's Order 12 Handbook as a comment that does one or more of the following (DO-12 Handbook, section 4.6A):

Question, with a reasonable basis, the accuracy of information presented in the EA;
Question, with a reasonable basis, the adequacy of the environmental analysis;
Present reasonable alternatives other than those presented in the EA; and/or
Cause changes or revisions in the proposal.

Comments from the EPA

Comment 1. Purpose and Need and Scope of Analysis - EPA recommends that NPS and FHWA further explain to the public and decision makers why the two projects are being pursued independently, especially in light of the efficiencies, and reductions in impacts to the environment, that could be gained by coordinating the planning, implementation, and future mitigation and monitoring of the two efforts. While we understand funding, timing, and a variety of other factors guide the implementation of various projects in Point Reyes National Seashore.

Response 1. *The National Park Service road maintenance and improvement projects are a separate action from Marin County's Sir Francis Drake Boulevard resurfacing, restoration and rehabilitation project. The National Park Service and Federal Highway Administration started planning the four NPS road projects in 2010, three years before the Sir Francis Drake Boulevard project was programmed for funding under the Federal Lands Access Program in 2013. The NPS road projects consist of work on roads within the National Seashore that are owned and maintained by NPS. Sir Francis Drake Boulevard, within the proposed project limits is owned and maintained by Marin County on an easement from the National Park Service. Public scoping for the Sir Francis Drake Boulevard project was initiated July 8, 2014, so it was too early in the planning stages to be included in this EA (see EA page 29). Construction for the four NPS road maintenance and improvement projects could begin as early as spring 2015 and be completed in late 2015. The Marin County Sir Francis Drake Boulevard project is currently scheduled to start construction in spring 2016 with completion likely in late 2017.*

Comment 2. Cumulative Impacts - Analyzing the two projects as one complete project would better allow for assessing the cumulative impacts associated with the combined rehabilitation of 34 miles of roads and 21 parking areas all within the same project footprint. Should the NPS continue to move forward on these as separate projects, the documents should both clearly identify the logistical efficiencies, and associated reduction in impacts to the environment, that can be achieved by constructing the rehabilitation projects at the same time. NPS should also confirm that, when considered together, the project impacts remain less than significant as is anticipated from the analysis of the two projects separately. The cumulative impact of constructing both project improvements at the same time need to be disclosed and used to schedule, and minimize, earthmoving equipment operation. For example, by planning the re-paving of the road surfaces of Sir Francis Drake at the same time as the spur roads leading into it, FHWA and NPS will minimize the need to haul dirt/materials in and out for both projects twice, instead of once. Visual impacts to

park visitors will be minimized if project timelines can be synchronized. Noise impacts to wildlife will be minimized as well. Both EAs should describe these, and other, reduced impacts that will be achieved through project synchronization.

Response 2. *Delaying the NPS road projects so that all five road projects could be simultaneously implemented could result in construction contracting and operation efficiencies. Carrying out all the road projects at the same time would not change the total quantity of “dirt/materials” to be moved or hauled. The “earthmoving equipment operation” depends on specified material quantities for individual road repair sections (e.g., culvert repair sites).*

The NPS road projects and Marin County road project would be implemented in different years and drainages. Therefore, Marin County road project would add negligible effects to the cumulative impacts to the resources within the road corridors addressed in the EA, including vegetation, wetlands, special status species, visitor experience and safety, or historic properties. Delaying the NPS road project would not reduce the risk of another major road failure (see response 8) that potentially could cause additional impacts to resources or visitors.

No work would occur near sensitive wildlife habitat (breeding habitat for northern spotted owls and snowy plover) to avoid construction noise impacts as described on page 27 in the EA. Similar mitigation may also be required for the Sir Francis Drake Boulevard project if needed to avoid construction noise impacts to sensitive wildlife. Because all the road projects would include mitigation to avoid construction noise impacts, there would be no additional impacts from implementing construction at the same time or at different times.

Mitigation to minimize impacts to visitors is described on pages 28 in the EA. Similar mitigation may be required for the Marin County’s road reconstruction project. As described on page 67 and 68 in the EA, construction traffic and activities would contribute to existing traffic noise, and may be noticeable to visitors at nearby attractions, hiking trails, and wilderness area. This would cause a temporary negligible effect on the visitor experience for the four road projects addressed in the EA. The impacts to visitor experience regarding the Marin County’s road project have yet to be analyzed but the environmental document will address the cumulative impacts the project area. At this time, the adverse cumulative effects to visitors are anticipated to be minimal. The improvements to the roads within the park will result in overall long-term benefits to visitors. The same would be true for Marin County’s road reconstruction project. Therefore the additional impacts from the Marin County road project would have minimal cumulative effects on visitors.

Comment 3. Culvert Rehabilitation - EPA recommends the use of open-bottom arch culverts instead of box culverts. For those culverts proposed to be lined, rather than replaced, consider replacing the old culverts with arch culverts if feasible and if additional cost and impacts associated with increased earth movement can be reduced as much as possible. EPA also recommends use of bioengineered bank stabilization where feasible instead of just traditional rip-rap.

Response 3. *Culverts that are proposed to be lined are typically in areas of deep fill where a large excavation and extensive disturbance of the surrounded natural terrain would be needed to replace the culvert. Excavation and replacement of the culverts in these locations were deemed to not be feasible due*

to disturbance to wetlands and other vegetated terrain, required shutdown of the road and disruption to public traffic, and cost.

The channel geometry and the existing roadway profile minimize the options of feasible structures that will physically fit because the clearance between the existing channel bottom and the roadway surface is set and a very shallow structure is required. Open-bottom arch culverts require a wider span to pass the same flood volume as a box culvert, causing greater impact during construction due to the larger footprint. Open-bottom arch culverts were considered earlier on in the design process for several larger culverts on Limantour Road and it was determined that box culverts would satisfy the aquatic organism passage requirements if they had a buried natural bottom. Burying the culverts deeper in the streambed will allow for better aquatic organism passage because a smaller, low-flow channel will become established within the culvert. Plus installing larger culverts would reduce the susceptible to blockages from debris that could be a barrier to aquatic species.

Traditional riprap is not being proposed for bank stabilization but as erosion control at the culvert ends. Riprap is proposed at each of the three aquatic organism passage culvert crossings. An option being considered for the final design is adding soil over the riprap to promote vegetation establishment over the riprap areas.

Comment 4. Wetland Impacts - NPS should confirm that the full project impacts, when considering the entirety of the 34 miles of roads to be rehabilitated plus the parking area improvements, will not result in impacts to wetlands that will be substantive enough to require an Individual Permit. EPA also recommends that the NPS clarify whether the Corps has verified the wetland delineation and confirmed the permitting strategy.

The NPS should confirm that that mitigation for Clean Water Act Section 404 and Section 401 impacts will be decided by the Corps and Regional Board, respectively and the environmental analysis of both road projects should address potential need for Clean Water Act 401 certification from the Regional Board.

Response 4. *The National Park Service is coordinating with the U.S. Army Corps of Engineers regarding wetland permitting for the Limantour Road and Chimney Rock Road repair projects. The National Park Service will submit a Clean Water Act section 404 wetland fill permit application to the U.S. Army Corps of Engineers for these road projects because planned construction activities would affect waters of the U.S. (see EA page 73). The National Park Service has confirmed with the U.S. Army Corps of Engineers that separate 404 permit applications can be submitted for the four NPS road projects. As part of this permitting process, the National Park Service shall also obtain required Clean Water Act Section 401 certifications from the Regional Water Quality Control Board. The Federal Highway Administration will obtain a "General Permit for Discharges of Storm Water Associated with Construction Activity" as required by the (see EA page 73). Required mitigation to offset wetland impacts is addressed under responses to comments 6 and 7 from the California Coastal Commission.*

The Federal Highway Administration would coordinate with the U.S. Army Corps of Engineers and the Regional Water Quality Control Board to obtain any Clean Water Act permits that may be required for the Sir Francis Drake Boulevard project.

Comment 5. Design Standards - One stated purpose of the project was to implement safety features consistent with current design standards. EPA commends NPS and FHWA for identifying that "maintaining the character of the roads" and "avoiding and minimizing impacts to seashore resources" are objectives of the project. In light of these objectives, EPA recommends additional discussion about context sensitive design and a discussion of waivers or modifications to adhering to a suite of current design standards that would best allow for maintaining the current character of the park roads.

Response 5. *As stated on page 1 of the EA, "The purpose of the proposed action is to provide safe driving surfaces for all travelers on national seashore roads and to reduce the possibility of road failures and to reduce maintenance costs, while at the same time, having little or no impacts to the adjacent environment and adhering to the management philosophy for visitor access as outlined in the General Management Plan: Point Reyes National Seashore (NPS 1980). The management philosophy, as described in the 1980 general management plan, is to "alleviate existing problems and minimize potential ones in the interest of making park access as pleasant, safe, and convenient as possible."*

The 1984 NPS Park Road Standards provide flexibility in the planning and design processes to allow for consideration of variations in types and intensities of park use, for wide differences in terrain and climatic conditions, and for protection of natural and cultural resources in NPS units. The project will rehabilitate road surfaces and improve road and parking safety with minimal changes to the existing designs of the roads and parking areas. The project roads and parking areas will remain in substantially similar condition as at present and the visitor experience of the road corridors will remain the same. The proposed work on Chimney Rock Road already includes exceptions to the design standards in order to maintain the one-lane character of the road and avoid and minimize resource impacts. The EA included an assessment of effects on historic properties that included addressing the character of the project roads (See EA pages 47-49 and 69-72). California State Historic Preservation Officer concurred with the National Park Service that there were "No Adverse Effects" on historic properties associated with the road projects (See EA page B-2 and 3).

Comments from California Coastal Commission

Comment 6. Were there any alternatives considered (other than the "no project") that would not result in some loss of wetland areas? Is this likely to be an issue in relation to the section 404 permit and the "no net loss" goal?

Response 6. *All alternatives that that were capable of meeting the purpose and need of the project included some permanent impacts to wetlands. This is due to the presence of wetlands at the location where the roads cross the drainages, the need to ensure that the roadway is protected, and practicable issue of budget.*

Realigning Chimney Rock Road to avoid wetlands was considered but dismissed for reasons described on pages 29 and 30 in the EA. The original road design for Chimney Rock Road was modified by adding a 1.5 foot wide curb and gutter near the existing wetlands to minimize impacts to wetlands upslope from the road. Some permanent loss of wetlands is unavoidable; however, improving road drainage is

expected to reduce the potential for road failure and erosion resulting in long-term benefits to nearby wetlands.

There is not an issue in relation to the section 404 permit and the “no net loss” goal. The “no net loss” goal originates from Executive Order (EO) 11990 which directs federal agencies to protect wetlands. There are two federal agencies which have regulatory oversight of wetlands for these projects are the Army Corps of Engineers and the National Park Service. As the NPS road projects will require a Nation-Wide Permit, the National Park Service will be required to meet Army Corps of Engineers standards that they have developed to meet their responsibilities under EO 11990, as well as for the Clean Water act. Also informal consultations have started with the Army Corps Engineers and mitigation has not been an issue.

Additionally, National Park Service as a federal agency has direct responsibilities to EO 11990. These are developed to the level of operational policy in NPS’s Director’s Order (DO) Manual 77-1. The Park and the NPS Water Resources Division have determined that the project meet NPS obligation to DO 77-1.

Comment 7. Along the same lines, are there any plans or possibilities for mitigating these losses (e.g., through habitat restoration elsewhere, mitigation bank, etc.)?

Response 7. *The National Park Service and Federal Highway Administration will develop a series of Best Management Practices (BMPs) which the construction contractor will use to enhance each of the repair sites affecting wetlands. This will generate varying degrees of ecological uplift at each site. The objective is to restore the function of the affected wetlands within the project area by at least 10% to offset the 0.072 acres of permanent impacts resulting in no net loss of wetlands. Depending on the affected wetland site, the BMPs could include: a) removing invasive plants; b) using a native plant mix to restore native wetland vegetation; c) restoring natural contours to encourage wetland development; d) placing downed woody debris near the culverts to restore instream and wetland cover; and e) shaping a natural stream channel profile near the culverts to restore pools and riffles.*

The National Park Service is consulting with the Army Corps Engineers on the road projects and would prepare a wetland mitigation plan to compensate for any wetland losses if additional mitigation is needed above the proposed BMPs.

Comment 8. The “Impacts on Wetlands” section of the EA discusses the potential for impacts to wetlands under the “no action” alternative due to erosion/damage to the existing culverts during storms, and due to the subsequent repairs that would be necessary. Can you elaborate at all on the severity of impacts that could be expected to occur under “no action”, in comparison to the minor permanent losses that would occur with the project?

Response 8. *Culverts not properly installed or maintained are prone to erosion. In the national seashore, water will continue to erode under and around culverts in inadequate or poor condition. For example, a January 2006 storm resulted in water flowing over the Limantour Road because the two 36” equivalent corrugated metal pipe culverts at Station 15+00 did not have sufficient capacity for flood flows. The storm caused severe erosion of the road prism and sedimentation of the adjacent stream channel and wetlands on both sides off the road. Flood water overtopped the road because of the large amount of cobbles, trees, brush and other debris that were washed down the channel and deposited*

upstream of the double corrugated metal pipe culverts. Future storm events would continue to cause similar erosion and deposition due to the steep slopes upstream and the channel flattening out and widening prior to the double culverts. The erosion was also partially caused due to a lack of a headwall or any formalized bank protection. The proposed box culvert would have wider opening to allow cobbles and other debris to pass through easier, thereby minimizing the risk of future erosion and damage.

In 2013, a different 48” Limantour Road culvert in poor condition failed because water flowed through the disintegrated bottom of the culvert and eroded material from around the culvert causing the road pavement to slump and road material to wash downstream covering wetland areas. Over the long-term, many of the other culverts in poor condition could eventually clog or collapse eroding large amounts of road fill material downstream burying nearby wetlands. Under the selected alternative, the repair of culverts and drainage features is expected to reduce the potential for road failure and erosion resulting in long-term benefits to nearby wetlands.

Comments from Individuals

Comment 9. Will the NPS and FHA pursue a project to make it much safer for bicyclists to ride out to places like Limantour Beach? Constructing dedicated bike lanes would reduce automobile traffic on the roads (since more visitors would ride their bikes), resulting in less wear and tear on the roads, which would extend the life of the road.

Response 9. *As described on EA page 29, bike safety elements are included in the road rehabilitation plans. Widening the roadways to accommodate a separated bike lane was outside the scope of the road repair projects.*

Comment 10. Install photovoltaic panels over all parking areas and sell the excess energy. Consider using technology which would replace the need for an asphalt surface and instead surface the road using a material that houses PV panels to generate energy, which could pay for the cost of the panel, thereby creating a road that would pay for itself over time. And help the park achieve its goal of being carbon neutral and vastly increasing the amount of clean energy produced in Marin County. Provide charging stations for electric and hybrid plug-in vehicles throughout the park to help electric vehicle owners have the assurance that they can visit more locations in Point Reyes National Seashore and know that there will be a way to charge their vehicle for the return trip.

Response 10. *The purpose of the road projects is to maintain or repair the existing roads and parking areas, plus makes some minor safety and accessibility improvements. Installing photovoltaic panels over parking areas and on road surfaces and providing charging stations for electric or hybrid plug-in vehicles are actions considered to be outside the scope of this project.*

Comment 11. Rebuild park roads and parking areas using innovative, natural methods to reduce imperviousness. If the surface of parking is to be changed, instead of using impermeable asphalt or the like, at least use a permeable surface. The same old techniques would result in impervious surfaces from which metals and toxins will run-off, leaching into streams and wetlands, thereby impairing water quality.

Response 11. *The majority of the existing road and parking surfaces will not be replaced. They will be treated to preserve and extend the life of the pavement. Pavement on Chimney Rock Road is the only section that needs replacement because of damage caused by saturated subsurface conditions and poor drainage. Pervious pavement is designed to allow percolation or infiltration of stormwater through the surface into the soil below where the water is naturally filtered. Permeable pavement would not solve drainage problems or reduce runoff on Chimney Rock Road because of the existing wet conditions. Plus permeable pavement would not have the load-bearing capacity required for the larger vehicles that use this road. The National Park Service may consider using pervious pavement for some parking areas during the final design stage.*

Comment 12. Reduce disruptions to ecological processes by promoting wildlife corridors and passages, especially in areas such as wetlands where animals such as amphibians frequently cross. Reduce the incidence of roadkills.

Response 12. *As described on EA page 64, two culverts on Limantour Road will be replaced with wider concrete culverts that could improve passage for California red-legged frogs. The repair of other culverts may also enhance animal passage at other sites. Wildlife safety elements are included in the road rehabilitation plans, such as information and speed limit signs, and improved lines of sight. After the project is approved, the National Park Service and Federal Highway Administration will prepare the final designs for Limantour and Chimney Rock roads. During the final design for these two projects the agencies may consider other elements to enhance wildlife passage.*