

APPENDIX G: AGENCY AND PUBLIC SCOPING



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division

September 20, 2017

12300 West Dakota Avenue
Suite 380A
Lakewood, CO 80228-2583
Office: 720-963-3668
Fax: 720-963-3596
Nathan.Allen@dot.gov

In Reply Refer To:
HFPM-16

[Recipient Name]
[Recipient Title]
[Recipient Company]
[Recipient Street Address]
[Recipient City, STATE Zip]

Dear [Mr./Ms. Recipient Last Name]:

The Federal Highway Administration, Central Federal Lands Highway Division (FHWA-CFLHD), in cooperation with Marin County, California and the National Park Service (NPS), is initiating a Subsequent Initial Study (IS) per the requirements of the California Environmental Quality Act (CEQA) to analyze changes to the Sir Francis Drake Boulevard (SFDB) Improvement Project. In accordance with the National Environmental Policy Act and CEQA, a joint environmental assessment (EA)/IS was prepared and distributed for public review in July 2015. The EA/IS analyzed improvements to approximately 12 miles of SFDB in Point Reyes National Seashore (PRNS) within Marin County. A Finding of No Significant Impact/Mitigated Negative Declaration (FONSI/MND) was issued in August 2015.

Since issuance of the FONSI/MND, FHWA-CFLHD has modified the Action Alternative to further improve conditions along SFDB and to provide detail to the mitigation approach to compensate for impacts identified in the original EA/IS. FHWA-CFLHD is also actively coordinating with Marin County and state agencies to mitigate upland riparian impacts. Changes to the Action Alternative include: (1) installing a bridge at Schooner Creek; (2) installing biotechnical bank stabilization along a segment of East Schooner Creek; (3) re-establishing a historic wetland at Drakes Beach and reconfiguring the parking lot; and (4) constructing two ponds to provide aquatic breeding habitat for the California red-legged frog. More details are provided below. The attached project location map also reflects the general location of these improvements.

1. The two existing 84-inch diameter corrugated metal culverts at Schooner Creek and SFDB (project mile (PM) 9.2) would be replaced with an approximately 57-foot-long, single-span bridge rather than an open-bottom arch structure as initially proposed. Between PM 9.1 and PM 9.3, approximately 750 feet of the roadway would be re-aligned by up to 12 feet to improve safety along the horizontal curves approaching the bridge, and the grade of the roadway would be raised by up to 3 feet.

2. Between PM 10.7 and PM 10.8, a side channel of East Schooner Creek has eroded a portion of the SFDB roadway embankment. The erosion is degrading aquatic habitat and water quality through deposition of eroded sediment, and creating a risk of road failure. Approximately 210 feet of biotechnical bank stabilization would be installed to re-establish and stabilize the roadway in this area. The intent of the design is to maintain the side channel in its current location; however, approximately 210 feet of the side channel may be shifted 6 to 8 feet east-southeast from the roadway to ensure its integrity.
3. To compensate for permanent wetland impacts as a result of roadway improvements, a wetland mitigation site is proposed at the Drakes Beach parking lot. Construction of the parking lot in the 1950s and 1960s resulted in filling a large wetland adjacent to Drakes Beach. Approximately half of the existing parking lot (approximately 2 acres) would be removed to re-establish the historic wetland. The parking lot would be reconfigured, existing culverts would be cleaned and/or replaced, and a segment of the existing sanitary sewer line located below the existing parking would be realigned and lowered to accommodate the mitigation site.
4. Two ponds would be constructed within Home Ranch, one of the historic ranching properties within PRNS, to provide California red-legged frog aquatic breeding habitat and achieve wetland mitigation requirements. The ponds would be constructed by excavating a pond bottom and side slopes, constructing a small dam and emergency spillway, and revegetating with native plants. The first pond would be located approximately 1.25 miles south of the intersection of SFDB and Home Ranch Road and would be approximately 0.53 acres in size. The second pond would be located approximately 3.5 miles south of the intersection of SFDB and Home Ranch Road, and would be approximately 0.35 acres in size. Construction equipment access routes would be designated, but no formal access roads would be constructed.

The FHWA-CFLHD is inviting comments from individuals, Federal, State, tribal governments, and local agencies, as well as others interested in or potentially affected by the changes to the action alternative. Your comments will help us to identify issues and concerns related to these changes, and we look forward to your participation in the process. We appreciate receiving any input you may have by October 20, 2017. Written comments or questions should be submitted to the FHWA Central Federal Lands Highway Division, Attention: Nate Allen, 12300 W. Dakota Ave., Suite 380, Lakewood, CO 80228; or sent via email to Nathan.Allen@dot.gov. Also, I can be reached at (720) 963-3668.

Thank you for your cooperation and assistance.

Sincerely yours,

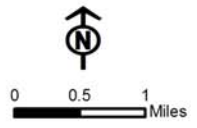
Nate Allen, P.E.
Project Manager

Enclosure: Project Location Map



Sir Francis Drake Boulevard Improvement Project

Point Reyes National Seashore	Point of Interest	Trail	Stream/River
Project Area	Trailhead	Minor Road	Waterbody
Project Miles	Mitigation Sites	Major Road	



Source Layer Credits: 2014 ESRI Ocean/World Basemap. Projection: Lambert Conformal Conic State Plane California III FIPS 0403 Feet North American Datum 1983. 7/28/2017

Mr.	John	McKeon	NOAA National Marine Fisheries Service	West Coast Region	777 Sonoma Ave., Room 325	Santa Rosa	CA	95404
Mr.	William	Connor	U.S. Army Corps of Engineers	San Francisco District	1455 Market Street #16	San Francisco	CA	94103
Mr.	Leif	Goude	U.S. Fish & Wildlife Service	Sacramento District	2800 Cottage Way, Room W-2605	Sacramento	CA	95825
			US Department of Agriculture	Petaluma Service Center	1301 Redwood Way, Suite 190	Petaluma	CA	94954
Mr.	Connell	Dunning	US Environmental Protection Agency	Region 9	ENF-4-2, 75 Hawthorne Street	San Francisco	CA	94105
Mr.	Xavier	Fernandez	Regional Water Quality Control Board	San Francisco Bay Region	1515 Clay Street	Oakland	CA	94612
Mr.	Nick	Tipon	Sacred Sites Protection Committee	Federated Indians of Grafton Rancheria	6400 Redwood Drive, Suite 300	Rohnert Park	CA	94928
			USGS Water Resources Division		6000 J Street, St. 2012	Sacramento	CA	95819
			Natural Resources Conservation Service		1301 Redwood Way, Suite 170	Petaluma	CA	94954
			Public Information Director	Association of Bay Area Governments	P O Box 2050	Oakland	CA	94612
			BAAQMD	Executive Officer	939 Ellis Street	San Francisco	CA	94109
			State Lands Commission		100 Howe Avenue, Suite 100-S	Sacramento	CA	95825
			State Water Resources Control Board		P.O. Box 100	Sacramento	CA	95812
Mr.	Larry	Simon	California Coastal Commission	Energy, Ocean Resources, and Federal Consistency Division	45 Front Street, Suite 2000	San Francisco	CA	94105-2219
			CA Coastal Conservancy		1330 Broadway #1300	Oakland	CA	94612
Ms.	Vicki	Frey	CA Dept. Fish & Wildlife	Marine Reg 3	619 2nd Street	Eureka	CA	95501
			CA Dept. of Fish & Wildlife	Reg 3 Regional Manager	7329 Silverado Trail	Napa	CA	94558
			CA Dept. of Water Resources	Chief	P.O. Box 942836	Sacramento	CA	94236
			CA EPA		1001 I Street	Sacramento	CA	95814
			CA Resources Agency	Office of the Secretary	1416 9th Street, 13th Floor	Sacramento	CA	95814
			County of Marin	Flood Control and Water Conservation District	3501 Civic Center Drive, #304	San Rafael	CA	94903
			County of Marin -Fire Dept.		P O Box 518	Woodacre	CA	94973
			Marin County Bicycle Coalition		PO Box 1115	Fairfax	CA	94978
			Marin County Transit District		P.O. Box 4186	San Rafael	CA	94903
			County Bikeways Committee		10 Meadowbrook Ct.	Novato	CA	94947
			Marin Transit		750 Lindaro Street, Suite 200	San Rafael	CA	94901
			Marin County Resource Conservation District		P.O. Box 1146	Point Reyes Station	CA	94956
			West Marin Chamber of Com.		Box 1045	Point Reyes Station	CA	94956
			North Marin Water District		P. O. Box 146	Novato	CA	94958
			Marin Municipal Water District		220 Nellen Ave	Corte Madera	CA	94925
			Marin Audubon Society		P.O. Box 599	Mill Valley	CA	94942
			Marin Conservation League		499 Corte Madera Ave	Corte Madera	CA	94925
Ms.	Eva	Buxton	CNPS Marin Chapter		111 Hacienda Drive	Tiburon	CA	94920
Ms.	Amy	Trainer	EAC of West Marin		P.O. Box 609	Pt. Reyes Station	CA	94956
			Native American Heritage Commission		915 Capitol Mall Room 364	Sacramento	CA	95814
			Environmental Action Club	Newsletter Ed.	885 College Ave.	Kentfield	CA	94904
			Environmental Forum of Marin		P.O. Box 150459	San Rafael	CA	94915
Ms.	Sandra Guldman &	Cindy Lowney	Friends of Corte Madera Creek		P.O. Box 415	Larkspur	CA	94977
			Friends of Novato Creek		1092 Bel Marin Keys Boulevard	Novato	CA	94949

Mr.	Bob	Berner	Marin Agricultural Land Trust		P.O. Box 809	Point Reyes	CA	94956
Ms.	Barbara	Salzman	Marin Audubon Society		48 Ardmore Road	Larkspur	CA	94939
	President		Marin Conservation League		175 N. Redwood Drive, Suite 135	San Rafael	CA	94903
Mr.	David	Yearsley	Petaluma Riverkeeper		521 Walnut St.	Petaluma	CA	94952
			Planning and Conservation League		1107 9th Street, Ste. 901	Sacramento	CA	95814
Mr.	David	Lewis	Save the Bay		1330 Broadway, Suite 1800	Oakland	CA	94612
	Chairperson		Sierra Club - Marin Group		P.O. Box 338	Kentfield	CA	94914
Mr.	Todd	Steiner	SPAWN		Box 400	Forest Knolls	CA	94933
	Reuven	Walder	SPAWN		Box 400	Forest Knolls	CA	94933
Mr.	Stan	Griffin	Trout Unlimited		27 Dorsett Lane	Mill Valley	CA	94941
Ms.	Elena	Belsky	Watershed Preservation Network		P.O. Box 8	San Geronimo	CA	94963
			The Wilderness Society		250 Montgomery St. Suite 210	San Francisco	CA	94104
			Nature Conservancy		201 Mission St., 4th Floor	San Francisco	CA	94105
			Salmon Protection and Watershed Network		P.O. Box 400	Forest Knolls	CA	94933
			Inverness Association		P.O. Box 382	Inverness	CA	94937
Mr.	Jarrold M.	Mendoza			25680 Sir Francis Drake Blvd	Point Reyes Station	CA	94956
Ms.	Patricia	Maurice	California Department of Transportation	District 4	PO Box 23660, MS-10D	Oakland	CA	94623-0660
Mr.	Leonard	Blumin			382 Throckmorton Ave	Mill Valley	CA	94941
Mr.	Gordon	Bennett	Save Our Seashore		40 Sunnyside Dr	Inverness	CA	94937
Mr.	Donald	Reinberg			501 Via Casitas, Apt. 525	Greenbrae	CA	94904
Mr.	Gerald H.	Meral			PO Box 1103	Inverness	CA	94937
Ms.	Kate	Carolan			40 Sunnyside Dr	Inverness	CA	94937
Mr.	Tim	Stanton			PO Box 344	Point Reyes Station	CA	94956
Ms.	Christine	Engel			6458 Stone Bridge Rd	Santa Rosa	CA	95409
Mr.	David	Tomb	Jeepney Projects Worldwide		1240 Valencia St	San Francisco	CA	94110
Mr.	Eric	Osterhaus			2531 15th Street #4	San Francisco	CA	94114
Ms.	Carolyn	Longstreth			PO Box 657	Inverness	CA	94937
Mr.	William	Wilson			6 Blue Rock Ct	Corte Madera	CA	94925
Ms.	Heather	Cameron			2508 Topaz Drive	Novato	CA	94945



National Park Service
U.S. Department of the Interior

Point Reyes
National Seashore

Point Reyes Station, CA
94956



Point Reyes National Seashore News Release

October 13, 2017

For Immediate Release

John A. Dell'Osso, 415-464-5135, john_a_dell'osso@nps.gov

R.J. Suokko, 415-473-4399, RSuokko@marincounty.org

Nate Allen, 720-963-3668, Nathan.Allen@dot.gov

NOTICE OF CRITICAL REPAIRS TO SIR FRANCIS DRAKE BLVD

Point Reyes National Seashore, Marin County — The Federal Highway Administration, Central Federal Lands Highway Division (FHWA-CFLHD), in cooperation with Marin County, California and the National Park Service (NPS), initiated a Subsequent Initial Study (IS) and public comment period to analyze changes to the Sir Francis Drake Boulevard Improvement Project. In accordance with the National Environmental Policy Act and the California Environmental Quality Act, a joint environmental assessment (EA)/IS was prepared and distributed for public review in July 2015. The EA/IS analyzed improvements to approximately 12 miles of Sir Francis Drake Boulevard in Point Reyes National Seashore (PRNS) within Marin County. A Finding of No Significant Impact/Mitigated Negative Declaration (FONSI/MND) was issued in August 2015, found here, <https://parkplanning.nps.gov/document.cfm?parkID=333&projectID=53489&documentID=83306>.

Since issuance of the FONSI/MND, FHWA-CFLHD has modified the Action Alternative to further improve conditions along Sir Francis Drake Boulevard and to provide detail to the mitigation approach to compensate for impacts identified in the original EA/IS. FHWA-CFLHD is also actively coordinating with Marin County and state agencies to mitigate upland riparian impacts. Changes to the Action Alternative include: (1) installing a bridge at Schooner Creek; (2) installing biotechnical bank stabilization along a segment of East Schooner Creek; (3) re-establishing a historic wetland at Drakes Beach and reconfiguring the parking lot; and (4) constructing two ponds to provide aquatic breeding habitat for the California red-legged frog. More details are provided below. Attached is the project map.

1. The two existing 84-inch diameter corrugated metal culverts at Schooner Creek and Sir Francis Drake Boulevard (project mile (PM) 9.2) would be replaced with an approximately 57-foot- long, single-span bridge rather than an open-bottom arch structure as initially proposed. Between PM 9.1 and PM 9.3, approximately 750 feet of the roadway would be re-aligned by up to 12 feet to improve safety along the horizontal curves approaching the bridge, and the grade of the roadway would be raised by up to 3 feet.

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The National Park Service cares for special places saved by the American people so that all may experience our heritage.

2. Between PM 10.7 and PM 10.8, a side channel of East Schooner Creek has eroded a portion of the Sir Francis Drake Boulevard roadway embankment. The erosion is degrading aquatic habitat and water quality through deposition of eroded sediment, and creating a risk of road failure.

Approximately 210 feet of biotechnical bank stabilization would be installed to re-establish and stabilize the roadway in this area. The intent of the design is to maintain the side channel in its current location; however, approximately 210 feet of the side channel may be shifted 6 to 8 feet east-southeast from the roadway to ensure its integrity.

3. To compensate for permanent wetland impacts as a result of roadway improvements, a wetland mitigation site is proposed at the Drakes Beach parking lot. Construction of the parking lot in the 1950s and 1960s resulted in filling a large wetland adjacent to Drakes Beach. Approximately half of the existing parking lot (approximately 2 acres) would be removed to re-establish the historic wetland. The parking lot would be reconfigured, existing culverts would be cleaned and/or replaced, and a segment of the existing sanitary sewer line located below the existing parking would be realigned and lowered to accommodate the mitigation site.

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The FHWA-CFLHD is inviting comments from individuals, Federal, State, tribal governments, and local agencies, as well as others interested in or potentially affected by the changes to the action alternative. Your comments will help identify issues and concerns related to these changes. Your participation is important to this process. The comment period is extended to November 6, 2017. Written comments or questions should be submitted to the FHWA Central Federal Lands Highway Division, Attention: Nate Allen, 12300 W. Dakota Ave., Suite 380, Lakewood, CO 80228; or sent via email to Nathan.Allen@dot.gov.

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Sir Francis Drake Boulevard Improvement Project

Point Reyes National Seashore	Trailhead	Trail	Stream/River
Project Area	Point of Interest	Minor Road	Waterbody
Mile Post	Seal Overlook	Major Road	US Coast Guard

Source Layer Credits: 2014 ESRI Ocean/World Basemap. Projection: Lambert Conformal Conic State Plane California III FIPS 0403 Feet North American Datum 1983. 4/28/2014

- NPS -

EXPERIENCE YOUR AMERICA

The National Park Service cares for special places saved by the American people so that all may experience our heritage.

From: THPO@gratonrancheria.com [mailto:THPO@gratonrancheria.com]
Sent: Monday, October 2, 2017 5:15 PM
To: Allen, Nathan (FHWA) <Nathan.Allen@dot.gov>
Subject: Sir Francis Drake Boulevard Improvement Project

Dear Nate Allen,

Thank you for notifying the Federated Indians of Graton Rancheria about Sir Francis Drake Boulevard Improvement Project, a project within the Tribe's Ancestral Territory. We appreciate being notified and will review your project within 10 business days. If you have an immediate request please contact the Tribal Heritage Preservation Office for assistance by phone at (707) 566-2288 or by email at thpo@gratonrancheria.com.

Sincerely,
Buffy McQuillen
Tribal Heritage Preservation Officer (THPO)
Native American Graves Protection and Repatriation Act (NAGPRA)
Office: 707.566.2288; ext. 137
Cell: 707.318.0485
FAX: 707.566.2291

Antonette Tomic

THPO Administrative Assistant
Federated Indians of Graton Rancheria
6400 Redwood Drive, Suite 300
Rohnert Park, CA 94928
Office: 707.566.2288, ext. 143
Fax: 707.566.2291
atomic@gratonrancheria.com

 please consider our environment before printing this email.

Federated Indians of Graton Rancheria and Tribal TANF of Sonoma & Marin - Proprietary and Confidential
CONFIDENTIALITY NOTICE: This transmittal is a confidential communication or may otherwise be privileged. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error and that any review, dissemination, distribution or copying of this transmittal is strictly prohibited. If you have received this communication in error, please notify this office at 707-566-2288, and immediately delete this message and all its attachments, if any. Thank you.

From: Aarreberg, Arn@Wildlife [<mailto:Arn.Aarreberg@wildlife.ca.gov>]
Sent: Wednesday, October 4, 2017 11:04 AM
To: Allen, Nathan (FHWA) <Nathan.Allen@dot.gov>
Subject: Marin County Work - HFPM-16

Mr. Allen,

The attached letter was forwarded to me for review. Vicki Frey is no longer with CDFW and I am now the contact person for work in the particular area. If possible, could you please change your mailing list for projects in this area to include me at the correct CDFW contact person.

Also, is there any additional documents for the work described in the letter that I would be able to review? If so, can you send those to me or send me a link to where they can be found online?

Thanks!

Arn Aarreberg
Environmental Scientist
Marine Environmental Review and Water Quality Project
California Department of Fish and Wildlife - Marine Region
5355 Skylane Blvd. Suite B, Santa Rosa, CA 95403
Office: (707) 576-2889 Cell Phone: (707) 791-4195
Arn.Aarreberg@wildlife.ca.gov
www.wildlife.ca.gov

Every Californian should conserve water. Find out how at:



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From: Conteh, Stephen@DOT [mailto:Stephen.Conteh@dot.ca.gov]

Sent: Friday, October 6, 2017 10:23 AM

To: Allen, Nathan (FHWA) <Nathan.Allen@dot.gov>

Subject: Requesting environmental documents for the Sir Francis Drake Boulevard Improvement Project

Importance: High

Good morning Nathan,

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process. My name is Stephen Conteh. I am the Transportation Planner responsible for projects in Marin and Sonoma Counties. We are in receipt of a letter which states that a Finding of No Significant Impact/Mitigated Negative Declaration was issued in August 2015 for the Sir Francis Drake Boulevard Improvement Project. I am writing this email to request the environmental documents that were prepared for this project. The requested information is necessary for our review and potential comments. Thank you for the considerations.

Sincerely,

Stephen Conteh,
Associate Transportation Planner
Local Development-Intergovernmental Review, District 4
111 Grand Avenue, MS 10D
Oakland, CA 94612
(510) 286-5534 office (510)286-5559 fax

From: Josh Berry <joshberry@me.com>
Sent: Friday, October 20, 2017 7:01:15 PM
To: Allen, Nathan (FHWA)
Subject: Comments - road in Pt Reyes Natl Seashore

Dear Mr Allen,

I'm writing to you with my firm support of the proposed rehabilitation of the main road through the Point Reyes National Seashore. As a life long resident of Olema, California, where I grew up on my family's small farm bordering the Point Reyes National Seashore; and as a surfer who frequents the beaches of Point Reyes on a weekly, year-round basis, I can confirm from ample experience that the road out to Drakes Beach has seen much better days — and I'm pleased with all aspects of the proposed roadway rehabilitation.

In particular I am very pleased with the proposal to improve the parking lot at Drakes Beach by halving the size of the lot, raising the level of the parking area, and improving the wetlands there.

The very large size of the Drakes Beach parking lot has always baffled me, since I was a child. In the past 35 years of frequent visits during holidays, weekdays, and weekends, I have rarely seen this parking lot completely full. This parking lot inhabits a beautiful area of wetlands that would be much improved with less parking lot, less asphalt, and more natural features. I am also happy to learn that the parking lot's elevation will be raised to accommodate for future sea level rise. All of this makes perfect sense.

I also support the proposal to improve the flooded roadway near East Schooner Creek. It's a traffic mess on busy days and it's a dangerous driving area at all times due to the very poor condition of the road and poor visibility on corners. I personally know a handful of local people who have been in serious car accidents on this particular stretch of roadway, including the tragic loss of life of a dear teenaged friend in the 1980s. A wider and improved roadway in this area is long overdue and much needed.

I also trust the input of officials and experts with the Point Reyes National Seashore and California state environmental agencies to monitor and mitigate the environmental impacts of this major road construction project through a sensitive wilderness area.

These are all common sense improvements to this roadway, I fully support it, and I look forward to seeing this work completed.

Sincerely,

Josh Berry

Resident of Olema and Daly City, California
joshberry@me.com
415-513-8519

From: [Allen, Nathan \(FHWA\)](#)
To: [Belish, Timberley \(FHWA\)](#); [Rude, Becky](#)
Subject: [EXTERNAL] FW: Comment letter on Francis Drake Repaving Project from the CA Native Plant Society
Date: Monday, November 06, 2017 9:52:09 AM
Attachments: [SFD Repaving Comment Nov 1-17.docx](#)

Nate Allen, P.E.
Project Manager- FHWA CFLHD
12300 W. Dakota Ave - Lakewood, CO 80228
Office: (720) 963-3668
Mobile: (720) 413-2954

From: Carolyn Longstreth <cklongstreth@gmail.com>
Sent: Wednesday, November 1, 2017 12:51:48 PM
To: Allen, Nathan (FHWA)
Subject: Comment letter on Francis Drake Repaving Project from the CA Native Plant Society

Hello Mr. Allen:

Please find attached a comment letter submitted on behalf of the Marin Chapter of the CA Native Plant Society.

Thank you for your attention.

--Carolyn Longstreth

Carolyn Longstreth
PO Box 657
10 Balmoral Way
Inverness CA 94937
415-669-7514



November 1, 2017

Nathan Allen
Us Department of Transportation
Central Federal Lands Highway Division
12300 West Dakota Ave., Suite 380A
Lakewood, CO 80228-2583
Via Email: Nathan.Allen@dot.gov

Dear Mr. Allen:

The following comments are submitted on behalf of the Marin Chapter of the California Native Plant Society (Marin CNPS) regarding a proposed amendment to the 2011 coastal development permit for Lawson's Landing. The California Native Plant Society is an organization of nearly 10,000 members statewide dedicated to conserving native plants and their natural habitats and to increasing the understanding, appreciation, and horticultural use of native plants. Marin CNPS has 350 members.

I received your letter dated September 20, 2017 regarding the reopening of the environmental review for the repaving project for Francis Drake Blvd. in the Point Reyes National Seashore. I am writing to thank you for the commitments the CFLHD has already made to avoid and mitigate impacts to the Point Reyes Meadowfoam and to urge further attention to these 3 important populations. I did not receive the July, 2015 FONSI/MND and so am assuming that these comments are timely.

- CNPS is pleased that your Department has identified three sub-populations of Point Reyes Meadowfoam in the project area and formulated plans to avoid or mitigate temporary and permanent impacts to this species.

- Please note that these 3 sub-populations comprise an important component of the species's entire population, which consists of only 12 other subpopulations. Since these three colonies are within a national park, they should theoretically enjoy a higher level of protection from development than colonies growing on private land. It is thus very important to seize any and all opportunities to maintain the conditions that support them.
- The meadowfoam growing along Francis Drake BLVD at B Ranch may represent a small proportion of the total acreage to be found in the Seashore, but this sub-population is important to botanically-inclined park visitors since it is readily visible and accessible to those using the road. Nature-lovers often stop at B Ranch and get out of their cars to admire the plant during the spring. Other sub-populations are located away from the road and on ranches, where public access is not as readily available.
- Rare plants by their nature are fussy about environmental factors that support them such as hydrological conditions. As you know, Point Reyes Meadowfoam does well in the unpaved ditches on the western portion of B Ranch.
- According to the FONSI/MND, your Department is considering avoiding acts that would adversely affect Point Reyes Meadowfoam, specifically, leaving the ditches unpaved in the areas that currently support the species and modifying the plan regarding relevation in these areas so as to avoid shortening the hydroperiod. CNPS strongly urges you to take these steps.
- Of course, we expect your Department to follow through on its stated intentions to obtain take permits from the California Department of Fish and Wildlife, to mitigate such takings at a 2:1 ratio by gathering seed, replanting it in suitable habitat and monitoring the success of such measures going forward.
- It is our understanding that the project design will affect habitat and a small population of Point Reyes birds-beak (*Chlorophyron maritimum palustre*, RPR 1B2), another rare annual, in the Schooner Creek vicinity. We note that no specific discussion of impact on this species was included in the original EA. We urge you to strictly adhere to the avoidance and mitigation measures set forth in the EA.

Thank you for the opportunity to comment.

A handwritten signature in black ink that reads "Carolyn K. Longstreth". The signature is written in a cursive style with a large initial 'C' and 'L'.

Carolyn K. Longstreth, Director, on behalf of the
Marin Chapter of the California Native Plant Society

From: [Allen, Nathan \(FHWA\)](#)
To: [Belish, Timberley \(FHWA\)](#); [Rude, Becky](#)
Subject: [EXTERNAL] FW: From NPS.gov: Sir Frances Drake Blvd. Improvement Project
Date: Monday, November 06, 2017 9:22:17 AM

Nate Allen, P.E.
Project Manager- FHWA CFLHD
12300 W. Dakota Ave - Lakewood, CO 80228
Office: (720) 963-3668
Mobile: (720) 413-2954

From: malloryco@comcast.net <malloryco@comcast.net>
Sent: Friday, November 3, 2017 12:33:00 PM
To: Allen, Nathan (FHWA)
Subject: From NPS.gov: Sir Frances Drake Blvd. Improvement Project

Email submitted from: malloryco@comcast.net at
/pore/learn/news/newsreleases_20171013_notice_sfdb_critical_repairs.htm (UUID:
1F90605E-1DD8-B71B-060F53C29F115615)

Mailing Address:
Ron & Amanda Mallory
58 Madrone Ave
Larkspur, CA 94939
Marin

We think that the above referenced proposal will encourage speeds in excess of what will be safe for wildlife and visitors to the outer peninsula of Pt. Reyes National Seashore. It is painful to see so much road kill now and that will increase if this plan is executed. Yes, the roads need to be repaired and places of flooding addressed, however, that can be done without widening the road so that driving is done in a more cautious manner than it would be at higher speeds.

From: [Allen, Nathan \(FHWA\)](#)
To: [Belish, Timberley \(FHWA\)](#); [Rude, Becky](#)
Subject: [EXTERNAL] FW: From NPS.gov: cattle guards on Sir Francis Drake Blvd
Date: Monday, November 06, 2017 8:43:21 AM

Nate Allen, P.E.
Project Manager- FHWA CFLHD
12300 W. Dakota Ave - Lakewood, CO 80228
Office: (720) 963-3668
Mobile: (720) 413-2954

From: lindalb@pipeline.com <lindalb@pipeline.com>
Sent: Sunday, November 5, 2017 7:58:17 PM
To: Allen, Nathan (FHWA)
Subject: From NPS.gov: cattle guards on Sir Francis Drake Blvd

Email submitted from: lindalb@pipeline.com at
/pore/learn/news/newsreleases_20171013_notice_sfdb_critical_repairs.htm (UUID:
98A35F30-1DD8-B71B-0712AF94F615184F)

For many years I have joined other birders near Ranches A and B and agree that while it is important to improve the road, it is important for us that the cattle guards be moved, as Save Our Seashore has recommended.



Save Our Seashore

A 501(c)(3) Charitable Organization (EIN 94-3221625)
Founded in 1993 to Protect Marin County's Ocean, Coasts, Estuaries, Watersheds and Creeks
PO Box 342, Pt. Reyes Station, CA 94956 gbatmuirb@aol.com 415-663-1881

November 5, 2017

To: FHWA Central Federal Lands Highway Division Attention: Nate Allen
12300 W. Dakota Ave., Suite 380, Lakewood, CO 80228

CC John A. Dell'Osso, Brannon Ketcham, Point Reyes National Seashore (PRNS)

Re: Extended Sir Francis Drake Boulevard (SFDB) Improvement Project Environmental Assessment / Impact Statement (EA/IS)

Save Our Seashore offers the following comments:

RECREATIONAL BIRDING IMPACTS AT HISTORIC WINDBREAKS The 8/26/15 response (5 and 6a) to our 10/8/15 letter about impacts at the birding site at B Ranch appears contradictory. In Response 5 notes that *"informal pullouts are likely to be reduced"* yet in Response 6a notes that the project *"will not exacerbate safety concerns for vehicles that have pulled off the road in these areas."* It is difficult to reconcile these two statements. In fact, it is likely that, after the project, birders will find it safer to find new parking further from the windbreak trees at the outskirts of the Ranch cores. With careful attention to the needs of the working ranch, such a new parking area may work for safer parking off the road, but at the expense of less safe walking further on the road.



As can be seen in the EA/IS photo (left) of the B Ranch windbreak, the dangerous conditions for birdwatchers will indeed be exacerbated by the widened road necessarily narrowing the remaining shoulders. Thus additional compensatory safety measures will be needed.

We agree in the short run with Response 6b that notes *"travel speeds in the corridor are expected to remain generally consistent with existing conditions."*

However, in the long run, future travel speeds will gradually increase to remain consistent with future conditions of a wider, more uniform road. We understand that speed limits are governed by state law, and thus cannot be part of this project. Thus additional compensatory safety measures will be needed.

We agree with response 6c that *"new cattle guards...will function as well or even better as rumble strips"* (such as we had suggested). These new cattle guards could thus function as the additional compensatory safety measures needed to mitigate narrower shoulders and higher speeds. However, the cattle guards are currently proposed to be replaced *"at their current locations"* which completely eliminates their usefulness as safety measures for birders at these sites.

A more careful review of existing cattle guards at A and B Ranches should have revealed that virtually none of them guard against cattle crossing because the guards are filled with sediment and their sides are not connected to any fencing (see above photo). Cattle can simply walk across or around the guards. Thus the current cattle guards' sole purpose is to act as defacto rumble strips to slow down vehicles before they enter the ranch core in order to protect the safety of ranch workers and ranching activities. We ask that the same consideration be given to the safety of birders and birding activities.

This can be easily accomplished by installing new cattle guards at the exterior ends of the windbreaks (i.e. a several yards further out from the ranch core) instead of at their current locations at the interior ends of the ranch windbreaks (right at the boundaries of the ranch cores). See photo above. Installing the cattle guards at our suggested new locations will not impact ranch operations because the location and condition of the existing cattle guards also does not and cannot impact ranch operations. Installing the cattle guards at our suggested new locations will not impact the safety of ranch workers or operations simply because the existing slow-down zone around the ranch core will be modestly expanded.

Save our Seashore urges that new cattle guards replace the existing cattle guards in new locations that will protect both ranch safety AND birder safety.

CULTURAL IMPACTS AT HISTORIC WINDBREAKS Thank you for acknowledging (Response 6d) our concerns about historic windbreak trees, which we trust will not be impacted. We also appreciate the elimination of the retaining wall below the B Ranch trees that we were concerned about.

POTENTIAL ADDITIONAL ENVIRONMENTAL HAZARDS Thank you for acknowledging (response 6e) the above ground storage tank we referenced. We understand that the project will not impact this tank, which is un-permitted and thus the tank's impacts and mitigations are outside the scope of this project.

ON-SITE MITIGATION ONLY Thank you for agreeing (Response 6f) with our comment that mitigation should be on-site only. We concur with the proposed Drakes Beach Parking lot and Home Ranch pond mitigation sites with the understanding that the remaining portion of the new parking lot will be re-configured for greater capacity and that for the current few days per year with parking at the existing lot's full capacity, the Park Service will consider overflow parking nearby.

SEA LEVEL RISE IMPACTS Thank you for agreeing (Response 6g) with our comment that the existing 84 inch culverts at Schooner Creek (which are now overtopped by a 25 year event) should be replaced. We concur with the proposed open bottom arch structure with a 100-year event capacity.

NO ADDITIONAL IMPERVIOUS SURFACING While Response 6h did not fully agree to our request for no increase in impervious surfaces, we understand that heavy volume on Sir Francis Drake makes pervious pavement impractical. We trust that the alternative solution of vegetated swales and buffers will "minimize impact to water quality."

MAPPING ERRORS Thank you for removing (response 6i) the mapping error that we pointed out

REFERENCE ERRORS Thank you for removing (response 6j) the reference errors that we pointed out

WEBSITE ERRORS The referenced website errors have continued, with the FONSI not published on the PRNS project website until months after its appeal period had elapsed. Thus the public who had only viewed this project on the PRNS website and who had only commented on the project through the PRNS website, were somehow expected to intuit that the FONSI was only available by an "alternative access" (response 6k) that was not the PRNS website. We thus welcome the extended comment period.

Sincerely,



President, Save Our Seashore

From: [Allen, Nathan \(FHWA\)](#)
To: [Belish, Timberley \(FHWA\)](#); [Rude, Becky](#)
Subject: [EXTERNAL] FW: From NPS.gov: Cattle guards
Date: Monday, November 06, 2017 9:18:51 AM

Nate Allen, P.E.
Project Manager- FHWA CFLHD
12300 W. Dakota Ave - Lakewood, CO 80228
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From: sgstanton@gmail.com <sgstanton@gmail.com>
Sent: Sunday, November 5, 2017 7:01:56 PM
To: Allen, Nathan (FHWA)
Subject: From NPS.gov: Cattle guards

Email submitted from: sgstanton@gmail.com at
/pore/learn/news/newsreleases_20171013_notice_sfdb_critical_repairs.htm (UUID:
969A95A5-AC05-2DA4-61E4A2254D3A494F)

Mailing Address:
Sherry Stanton
PO Box 344
Point Reyes Station, CA 94956
United States

New cattle guards are needed to replace the existing cattle guards in new locations that will protect both ranch safety AND birder safety. Thank you.

From: [Allen, Nathan \(FHWA\)](#)
To: [Belish, Timberley \(FHWA\)](#); [Rude, Becky](#)
Subject: [EXTERNAL] FW: From NPS.gov: Sir Francis Drake Blvd. Critical Repairs
Date: Monday, November 06, 2017 8:43:04 AM

Nate Allen, P.E.
Project Manager- FHWA CFLHD
12300 W. Dakota Ave - Lakewood, CO 80228
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From: stwbirder@gmail.com <stwbirder@gmail.com>
Sent: Sunday, November 5, 2017 10:05:04 PM
To: Allen, Nathan (FHWA)
Subject: From NPS.gov: Sir Francis Drake Blvd. Critical Repairs

Email submitted from: stwbirder@gmail.com at
/pore/learn/news/newsreleases_20171013_notice_sfdb_critical_repairs.htm (UUID:
9D2A9CE4-1DD8-B71B-03908F4B53070B53)

I support "new cattle guards to replace the existing cattle guards in new locations that will protect both ranch safety AND birding safety". I am a birder who frequents the location in question and request that my safety be considered by implementing this simple request.
Respectfully submitted, Stefan Williams

From: [Allen, Nathan \(FHWA\)](#)
To: [Belish, Timberley \(FHWA\)](#); [Rude, Becky](#)
Subject: [EXTERNAL] FW: From NPS.gov: improvement plan for Sir Francis Drake
Date: Monday, November 06, 2017 9:14:47 AM

Nate Allen, P.E.
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From: chrisme@sonic.net <chrisme@sonic.net>
Sent: Monday, November 6, 2017 8:45:02 AM
To: Allen, Nathan (FHWA)
Subject: From NPS.gov: improvement plan for Sir Francis Drake

Email submitted from: chrisme@sonic.net at
/pore/learn/news/newsreleases_20171013_notice_sfdb_critical_repairs.htm (UUID:
B409E658-1DD8-B71B-06662384F0201DFF)

Mailing Address:
Christine Engel
6458 Stone Bridge Rd.
Santa Rosa, CA 95409
United States

Agree

From: [Allen, Nathan \(FHWA\)](#)
To: [Belish, Timberley \(FHWA\)](#); [Rude, Becky](#)
Subject: [EXTERNAL] FW: From NPS.gov: SFD
Date: Monday, November 06, 2017 9:14:43 AM

Nate Allen, P.E.
Project Manager- FHWA CFLHD
12300 W. Dakota Ave - Lakewood, CO 80228
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From: kate94965@aol.com <kate94965@aol.com>
Sent: Monday, November 6, 2017 8:42:02 AM
To: Allen, Nathan (FHWA)
Subject: From NPS.gov: SFD

Email submitted from: kate94965@aol.com at
/pore/learn/news/newsreleases_20171013_notice_sfdb_critical_repairs.htm (UUID:
B3EFE92F-1DD8-B71B-038AFA2511B829E6)

Don't make this road easier to speed on as that will happen as well as increased bike use. Make areas of pullouts for birders who could very well outnumber bicyclists in user numbers. Add new cattle guards to replace the existing cattle guards in new locations that will protect both ranch safety AND birder safety"