

**Finding of No Significant Impact  
G-6-1 Road Removal Project  
Redwood National Park  
Humboldt County, California**

This Finding of No Significant Impact (FONSI) should be attached to the *G-6-1 Road Removal Environmental Assessment* (EA) dated February 2021. This FONSI together with the EA constitute a complete record of the conservation planning and environmental impact analysis process for this proposal. Also attached is the park manager's determination that the Selected Action will reduce the existing impairment to Redwood National Park watersheds and no impairment to park resources will result (Appendix A).

The National Park Service (NPS) will implement as its Selected Action Alternative 2 (hereafter referred to as the Selected Action) as presented in the EA (which was also identified in the EA as the proposed action). Two comments were received during the public comment period. One comment required a correction, however it did not have substantive effect on Alternative 2, which describes a restoration project that is well understood and supported by stakeholders in the local area and the region. The EA identified and analyzed two alternatives, the Selected Action and no action.

Under the Selected Action, the NPS will remove about one mile of the G-6-1 road. This road project will reduce the amount of erosion (i.e. sediment delivery) being discharged from the project area into Tom McDonald Creek to natural condition and reduce long-term costs of maintaining the network of legacy logging roads in the park.

The Selected Action to remove a 1 mile section of a logging road to reduce erosion and sedimentation is consistent with the direction in the 1999 Redwood National and State Parks *Final General Management Plan/General Plan, Final Environmental Impact Statement/Environmental Impact Report* (RNSP GMP/FEIS) approved through the 2000 *Record of Decision*. Under the 1999 GMP/FEIS, watershed restoration work within the park emphasizes partial landform restoration, with complete removal of all major logging roads and limited removal of minor roads that pose the greatest threat to park resources.

**Purpose and Need for Road Removal**

The purpose of the project is to reduce erosion and restore hydrologic function by removing a failing segment of the former logging haul road called G-6-1 in the Tom McDonald Creek drainage. The National Park Service needs to take this action to reduce impacts to streams and fish habitat, drainage patterns and hydrologic flowpaths from these roads. The NPS also needs to take this action to reduce the threat of sediment delivery from road crossings and failing culverts.

**Alternatives Considered in the Environmental Assessment**

The February 2021 EA described two alternatives:

- Alternative 1: No Action

- **Alternative 2: G-6-1 Road Removal (Selected Action and Environmentally Preferable Alternative)**

Under the no-action alternative (Alternative 1), no roads would be removed. The G-6-1 road is currently not used by NPS staff or the public. Road surface and drainage structures would receive maintenance only if funding was available after all other higher priority assets were brought into good condition. When culverts fail, they would be replaced if funding and heavy equipment access are available. It is unlikely that funding would be available for maintenance or removal of this segment of road, culvert replacement, or other drainage improvement, because of its low ranking on park facility management priorities. Threats to aquatic and terrestrial ecosystems from crossing failures or landsliding would continue.

Under Alternative 2 (the Selected Action), 1 mile of the G-6-1 road would be removed, and the original topography and drainage pattern restored to the extent practicable (EA Figure 2, page 6). Approximately 42,500 cubic yards (cy) of earthen fill material would be excavated from legacy roads, stream crossings, swales, and unstable slopes during road removal. About 25.4 acres would be affected by excavation and placement of excavated soil. All work associated with this project would occur between August 1 and October 15, and daily limited operating periods for heavy equipment and vehicle access and operation would be implemented at project startup in August until September 15.

### **Environmentally Preferable Alternative**

The Council on Environmental Quality's National Environmental Policy Act (CEQ NEPA) regulations and the National Park Service NEPA guidelines require that "the alternative or alternatives which were considered to be environmentally preferable" be identified. The CEQ defines "environmentally preferable" as "the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative that best protects, preserves, and enhances historic, cultural, and natural resources." The environmentally preferable alternative is based on an evaluation of the alternative using the criteria identified in Section 101 of NEPA stated below:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;
- Achieve a balance between populations and resource use which will permit high standards of living and a wide sharing of life's amenities; and

- Enhance the quality of renewable resources and approach maximum attainable recycling of depletable resources.

The NPS determined that Alternative 2, the Selected Action, is the environmentally preferable alternative.

### **Public Involvement**

The EA was available for review for 30 days from February 20 to March 22, 2021. Emails announcing availability of the EA for review were sent to local tribes, elected officials, organizations, businesses, individuals, and federal, state, and local agencies. A press release was sent to the park media list, which includes local and regional newspapers, radio, and television stations. No requests for copies of the EA were received. All letters and the press release provided the Internet address where the EA was posted on the NPS Planning, Environment, and Public Comment (PEPC ID 56791) public site at [parkplanning.nps.gov/G\\_6\\_1](http://parkplanning.nps.gov/G_6_1). There was no media interest in this specific project.

### **Response to Comments**

Two commenters provided comments on the EA. One noted an error in the attribution of ancestral territory. The other provided comments related to submission of a permit for the protection of water quality. An Errata sheet is appended to this FONSI (Appendix B) describing the correction and addition, and listing the comments and NPS responses. All comments were posted to the PEPC public site. No other comments were received electronically or by mail.

### **Consultations with Agencies and Tribes**

The Selected Action has the potential to affect Southern Oregon/Northern California Coast coho salmon, California Coastal Chinook salmon, Northern California steelhead trout, northern spotted owls, and marbled murrelets, all of which are federally listed as threatened.

The NPS initiated consultation under Section 7 of the Endangered Species Act (ESA) with personnel from the Arcata offices of the US Fish and Wildlife Service (USFWS) and Arcata NOAA Fisheries (National Marine Fisheries Service-NMFS) on May 15, 2015. USFWS and NMFS attended a field review on September 15, 2015. Additional meetings were held on May 17, 2016. The NPS and USFWS visited the proposed project site on May 31, 2017.

Effects and mitigations for effects to listed aquatic and terrestrial species are described in detail in the BAs submitted to NMFS and USFWS, respectively.

*National Marine Fisheries Service* - The NMFS issued a LOC and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response covering the G-6-1 Road Removal project on December 20, 2016. NMFS concurred with the NPS determination that the proposed action is not likely to adversely affect coastal California Chinook, Southern Oregon/Northern California Coast coho salmon, or northern

California steelhead, or their designated critical habitat, under section 7(a)(2) of the Endangered Species Act. NMFS also reviewed the proposed action for potential effects on Essential Fish Habitat (EFH) designated under the Magnuson-Stevens Fishery Conservation and Management Act, and concluded that the project would adversely affect EFH. NMFS determined that the Best Management Practices (BMP), project design features and measures incorporated into the proposed action will minimize adverse effects to EFH, and recommended no additional conservation measures.

*US Fish and Wildlife Service* - The NPS submitted a BA to USFWS on July 17, 2017. The USFWS issued a Biological Opinion (BO) on September 21, 2017 that concurred with the NPS determination that the proposed action may affect and is likely to adversely affect marbled murrelets from noise disturbance on 286.4 acres of habitat, and may affect but is not likely to adversely affect murrelets from a potential increase in nest predation from removal of protective vegetation that screens nests. Adverse effects on marbled murrelets from noise disturbance result from heavy equipment operation and vehicle access during the nesting season, and would be minimized through implementation of daily limited operating periods to reduce noise during dawn and dusk when murrelets are most active in the forests. The USFWS authorized incidental take of marbled murrelets in the form of noise disturbance that could lead to nest abandonment on 286.4 acres of murrelet nesting habitat.

The USFWS concurred that the proposed action may affect but is not likely to adversely affect northern spotted owls based on removal of an insignificant amount (2.85 acres) of owl habitat, the slight possibility of nesting owls going undetected, a slight amount of habitat degradation that would be offset by placement of large woody debris and other types of mulch that would provide habitat for owl prey, and because project-generated noise above ambient levels would occur outside the breeding season.

*State Historic Preservation Office* - In accordance with Section 106 of the National Historic Preservation Act (NHPA), the NPS consulted with the California State Historic Preservation Officer (SHPO) on October 16, 2019 and sought concurrence with the NPS finding of No Historic Properties Affected from the proposed action. The SHPO had no objections with the NPS finding on November 15, 2019.

*Tribal Consultations* - The NPS consulted, in accordance with Section 106 NHPA, with five tribal governments whose members have ties to lands within the project area and the vicinity. Big Lagoon Rancheria, Resighini Rancheria, Trinidad Rancheria, and Yurok Tribe received letters on October 16, 2019 that an EA was being prepared and with an offer to meet on a government to government basis. The NPS met with the Yurok Tribe's Culture Committee on March 23, 2018 regarding the project. One elder expressed knowledge about the historic Trinidad Trail in the project vicinity. The NPS determined that the trail route was near to but outside the project Area of Potential Effect (APE). No other comments or concerns were received about the project from these four tribes. The Hoopa Valley Tribe was notified of the availability of the EA and an offer to meet face-to-face on a government-to-government basis, on February 23, 2021. In addition, Section

106 NHPA consultation package was submitted to the Hoopa Valley Tribal Historic Preservation Officer on March 16, 2021. A follow-up phone call was made from NPS staff to the Hoopa Valley THPO offering a tour of the project area or any other additional information. No comments from Hoopa Valley Tribe have been received.

Cultural resource inventory reports were prepared for the project inclusive of a Historic Property Survey Report for the G-6-1 Road Removal Project prepared for Redwood National Park by Humboldt State University Cultural Resource Facility in 2016, and Trip Report for Remove Failing Road G-6-1 and Stabilize Erosional Threat Above Tall Trees Grove - (NPS PEPC No. 56791).

Cultural resource inventory reports were prepared for the project inclusive of a Historic Property Survey Report for the G-6-1 Road Removal Project (Steele, et al. 2016), and Trip Report for Remove Failing Road G-6-1 and Stabilize Erosional Threat Above Tall Trees Grove - (NPS PEPC No. 56791).

### **Why This Project Will Not Have a Significant Effect on the Environment**

This section summarizes effects on resources in the context of the project area and the park as a whole, and documents that none of these effects are significant. Further, the Selected Action is not part of a larger action and will not establish a precedent for future actions.

The Selected Action will not affect old-growth forests or cultural resources. The EA contains descriptions of mitigation measures to minimize adverse effects on air quality, soils, topography, hydrology, water quality, floodplains, riparian and riverine wetlands, vegetation, wildlife, and threatened species. Potential adverse effects to these resources that have been determined to not reach a level of significance and will not require extensive mitigation on the part of the NPS to avoid or reduce the effects discussed below.

*Air Quality*—Localized short-term adverse effects on air quality under the Selected Action will result from emissions from heavy equipment and other vehicles, gasoline-powered tools during project implementation (EA page 9). Emission would return to normal during non-implementation hours and after the project is completed.

*Effects on Soils and Topography*— The Selected Action would have short-term localized adverse effects on previously disturbed soils from excavation of 42,500 cy over 25.4 acres. Long-term effects on soils and topography from removing road segments would be beneficial throughout the project area by reducing erosion and the likelihood of road failures that cause landslides, and by recovering and repositioning topsoil to speed regrowth of vegetation (EA page 10).

*Effects on Hydrology and Water Quality*—The Selected Action will have long-term benefits on hydrology and water quality in Tom McDonald Creek and the proposed removal of the G-6-1 road is fully consistent with the recommendations in the Redwood

Creek TMDL to reduce sediment input into Redwood Creek and its tributaries (EA page 12).

*Effects on Floodplains and Wetlands*— There would be no adverse effects on floodplains or wetlands under the Selected Action alternative as there are none on-site. There would be short-term, adverse effects on about 7 acres of riparian vegetation, along both sides of intermittent streams crossing the G-6-1 road, by project activities. There would be long-term beneficial impacts to riparian vegetation as revegetation and recovery occur (EA page 13).

*Effects on Vegetation*— Removal of 25.4 acres of vegetation under the Selected Action would be a short-term localized and adverse, lasting only a few years as revegetation occurs. Vegetation would regrow on about 20.5 acres where the G-6-1 road is removed, resulting in long-term benefits (EA page 15).

*Effects on Non-Sensitive Fish and Wildlife*— There would be short-term localized adverse effects on some aquatic species where stream crossings are excavated but wildlife would move back into the area following project completion (EA page 16).

*Effects on Rare, Sensitive, Threatened, and Endangered Species*—The NMFS concurred with the NPS determination that this project may affect but is not likely to adversely affect listed fish species or their respective critical habitats, based on the design and timing of the Selected Action (EA page 18).

The USFWS concurred with the NPS determination that the Selected Action may affect and is likely to adversely affect marbled murrelets from noise disturbance on 286.4 acres of habitat, and may affect but is not likely to adversely affect murrelets from a potential increase in nest predation from removal of protective vegetation that screens nests (EA page 18). The USFWS authorized incidental take of marbled murrelets in the form of noise disturbance that could lead to nest abandonment on 286.4 acres of murrelet nesting habitat.

The USFWS concurred that the Selected Action may affect but is not likely to adversely affect northern spotted owls through habitat disturbance (EA page 19). Habitat outside the road corridor will remain unaffected.

For the Humboldt marten (*Martes caurina humboldtensis*) the Selected Action would have no effect because the nearest known marten is 10 miles from the project, the date of project implementation (after August 1st) is after kits have left the den, and road removal implementation will be completed within one season (EA page 19).

For California condors, the Selected Action would result in a net benefit to condors long-term, by reducing threats to old-growth redwoods trees downhill of the project site and restoring optimum conditions for recovery of old-growth redwood forests on the former road prism.



*Effects on Cultural Resources*— The Selected Action would have no effect on cultural resources. Under the terminology of the implementing regulations of Section 106 of the National Historic Preservation Act (36 CR 800), no historic properties, determined eligible for or listed on the National Register of Historic Places, would be affected by the Selected Action (EA page 21).

*Effects on Visitor Experience and Experience*— There would be no effect on visitor use or experience from the Selected Action (EA page 21).

*Socioeconomics*—The Selected Action will not have any growth-inducing effects (EA page 21).

*Conclusions*—As summarized above, the effects of the Selected Action have been considered and determined to be less than significant. These effects have also been considered under the criteria for significance listed in the Council on Environmental Quality regulations and found to be less than significant. Actions for which mitigation can be prescribed, the prescribed mitigation, and the responsible party are summarized in the following table. An NPS geologist will provide project oversight and supervision of project activities.

**Summary of Adverse Effects on Resources and Mitigations  
Middle Fork Lost Man Creek Second-Growth Forest Restoration**

Resource	Effect	Mitigation/Responsible Party
Air Quality	Temporary localized vehicle emissions	Vehicle emissions regulated to state standards (contractor, NPS)
Soils & Topography	42,500 cy excavated over 36.6 acres and placed in stable locations not subject to erosion into stream and for G-6-1 road removal.	Multiple minimization measures to reduce erosion include timing of work, mulching, and winterization BMPs (contractor)
Hydrology & Water Quality	Moderate benefit to water quality and hydrology in project area where excavation in stream crossings and road reaches would permanently prevent an estimated 24,290 cy of sediment from entering Tom McDonald Creek.	Spill prevention plan prepared (NPS) and implemented (contractor). Implement multiple minimization measures and BMPs to reduce erosion and short-term adverse effects (contractor).
Floodplains and Wetlands	No floodplains and wetlands exist in the project. Seven acres of riparian vegetation (riparian wetland) affected on both sides of intermittent streams and 6 stream crossings; negligible benefit to Redwood Creek floodplain from	BMPs implemented and drainage structures repaired or replaced (contractor).


Resource	Effect	Mitigation/Responsible Party
	preventing erosion of 24,290 cy of into creek	
Vegetation	Negligible adverse effect from removal or disturbance of 25.4 acres second-growth forest in road corridor and slopes for road removal. Long-term benefit from natural revegetation along 1.0 mile of road removed.	Vegetation removed stockpiled and used as mulch on exposed soils; natural revegetation allowed.
Wildlife	Some individual small sedentary animals killed during heavy equipment use; wildlife attracted to human food at backcountry camp. Negligible adverse effects on park populations of affected wildlife species.	Loss of individual small sedentary animals unavoidable. Food scraps and trash removed daily to avoid attracting scavengers and habituating wildlife to people and human food sources (contractor). Campers required to store food and trash in wildlife proof storage equipment.
Threatened Species	<p>Negligible short-term adverse effects on listed fish from sediment released; discountable adverse effects on fish from heavy equipment leakage during stream channel excavation.</p> <p>Negligible short-term adverse effects on northern spotted owls from short-term degradation of habitat in project area.</p> <p>Moderate short-term adverse effects on marbled murrelets from noise during construction. Negligible long-term adverse effects on murrelets from increased threat of corvid predation and habitat degradation.</p> <p>No short-term effect on Humboldt marten and California condor</p>	Work timing restrictions protect birds and fish & BMPs protect fish (contractor).
Cultural Resources	No effect	



### Basis for Decision

Based on the environmental assessment, analyses of issues and alternatives, together with consideration of minimal public interest expressed; the relation between public interest and laws, statutes, and regulations for managing National Park Service units; and the ability of the mitigation measures to reduce or eliminate adverse impacts, the NPS will implement as its Selected Action the project described as Alternative 2 in the G-6-1 Road Removal Environmental Assessment.

It is the determination of the National Park Service that the Selected Action to remove a one mile segment of a failing logging road to reduce erosion does not constitute a major federal action significantly affecting the quality of the human environment, nor is this project without precedent or similar to ones that normally require an environmental impact statement. The Selected Action will further the goals for watershed restoration described in the 1999 GMP/FEIS and 2000 Record of Decision. Therefore, in compliance with the National Environmental Policy Act, the National Park Service will not prepare an environmental impact statement, and will proceed with implementation of the project as soon as practicable.

Recommended:  Digitally signed by STEVEN MIETZ  
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Steven Mietz  
Superintendent  
Redwood National Park

Date

Approved: \_\_\_\_\_

Cindy Orlando  
Acting Regional Director  
Interior Region 8, 9, 10, 12

Date

## Appendix A – Determination of Non-Impairment

While Congress has given the National Park Service (NPS) management discretion to allow impacts within parks, that discretion is limited by the statutory requirement, generally enforceable by the federal courts, that the NPS must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This cornerstone of the Organic Act establishes the primary responsibility of the NPS: to ensure that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

The impairment of park resources and values may not be allowed by the NPS unless directly and specifically provided for by legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the Service from having the authority to manage the activity so as to avoid the impairment.

The impairment that is prohibited by the Organic Act and the General Authorities Act is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Whether an impact meets this definition depends on the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts.

An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- identified in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. An impact that may, but would not necessarily, lead to impairment may result from visitor activities; NPS administrative activities; or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park.

National Park Service's *Management Policies 2006* requires analysis of potential effects to determine whether or not actions would impair park resources. The park resources and values that are subject to the no-impairment standard include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Redwood National Park was established by Congress in 1968 to "preserve significant examples of the coastal redwood ... forests and the streams ... with which they are associated for purposes of public inspiration, enjoyment, and scientific study." [Public Law 90-245]. Congress expanded Redwood National Park in 1978 and authorized the NPS to develop and implement "a program for the rehabilitation of areas within ... the park" affected by past logging disturbances. [Public Law 95-250, Section 101(a) (6)]

The 1999 Redwood National and State Parks *Final General Management Plan/General Plan, Final Environmental Impact Statement/Environmental Impact Report* (RNSP GMP/FEIS) approved through the 2000 *Record of Decision* directs the park to engage in a watershed restoration program within the park to protect aquatic ecosystems from sediment delivery and protect terrestrial habitat from landslides.

The following topics from the EA were considered as measures of the condition of park watersheds and are applicable to the evaluation of removing the G-6-1 road for potential impairment: air quality; soils and topography; hydrology and water quality; floodplains and riparian wetlands; vegetation; fish and wildlife species that are not listed as threatened or endangered; threatened and endangered species; and cultural resources.

Non-resource topics such as visitor use, socioeconomics of gateway communities, or public health and safety are not subject to impairment determinations.

Removing a segment of the G-6-1 road will not reduce the existing impairment of soils and topography; hydrology and water quality; floodplains and riparian wetlands;

vegetation; fish and wildlife species that are not listed as threatened or endangered; threatened and endangered species in the Redwood Creek watershed or in other tributaries outside the project area, and cultural resources. The impaired condition of these and other resources from past logging of old growth redwood forests and road building was the primary reason for expanding Redwood National Park in 1978. The “Redwood Amendment” to the General Authorities Act reiterated the non-impairment provision of the Organic Act that applies to all national park units (*Management Policies 2006* 1.4.1 and 1.4.2).

*Air Quality*— Removing a segment of the G-6-1 road will result in adverse impacts to air quality primarily through vehicle emissions. This impact will be localized within the immediate area of operations during project implementation. Emissions from vehicles and equipment will be confined to the project site and mitigated through current licensing to meet state air quality standards. Accordingly, there will be no new impairment to air quality from implementing road removal activities.

*Soils and Topography*— Removing a segment of the G-6-1 road will not create new alterations to topography. Short-term effects on soils from erosion will not cause new impairment because of the BMPs and multiple minimization measures that will be implemented. There will be no impairment to soils or topography, which were impaired through the original clear-cut tractor-based logging and road construction.

Potential short-term adverse impacts from erosion will be mitigated through erosion control methods and BMPs. The effects on soils are acceptable because the impacts result from an action needed to achieve objectives for restoration outlined in the 1999 GMP. Accordingly, there will be reduced impairment to soils or topography in the project area from implementing road removal activities as more natural conditions are reestablished.

*Hydrology and Water Quality*— Short-term adverse effects to hydrology and water quality will be avoided or minimized by incorporating multiple mitigation measures and BMPs. Standard BMPs for road removal and upgrade work would be employed to minimize or eliminate the potential for surface erosion from the project site. Ground cover would be applied on all bare soil areas within the project area and woody debris would be placed in excavated channels after primary treatments are completed.

The short-term adverse effects on water quality will not rise to impairment because of the multiple mitigation measures and BMPs that will be implemented. These short-term adverse effects are unavoidable because they are necessary to achieve the restoration objectives. Implementing road removal activities will not cause new impairment to hydrology or water quality in the project area. In the longer-term the project will reduce impairment to hydrology through reestablishment of appropriate hydrologic flowpaths.

*Floodplains and Riparian Wetlands*— Removing a segment of the G-6-1 road will have a no effect on floodplains. Implementing road removal activities will not cause new impairment to floodplains in the project area.

There will be no loss of wetlands from this project. Accordingly, road removal activities will not cause new impairment to riparian wetland values and functions in the project area.

*Vegetation Resources*— Removing a segment of the G-6-1 road will have short-term localized adverse effects to vegetation within the project area. Approximately 7.4 acres would be affected from road removal some of which is road surface that is not heavily vegetated. All vegetation affected is common in the park and the region. Alders would be first tree species to recolonize the restored area, followed by conifers. There will be no adverse effects on old-growth forest or residual old-growth trees from removing this road. Accordingly, implementing road removal activities will not further impair vegetation values or function and in the long term will reduce vegetation impairment in the project area.

*Fish and Wildlife Resources*— Loss of habitat from vegetation removal and disturbance associated with the selected action will be a short-term localized adverse effect on individuals of small sedentary species that cannot move out of work sites. Some individuals of aquatic species and small wildlife that are common in the area would be killed by heavy equipment. Wildlife would move back into the area following road removal. Accordingly, implementing road removal activities will not impair wildlife resources in the project area.

*Threatened and Endangered Species*— The selected action may affect but is not likely to adversely affect listed fish species or their respective critical habitats, based on the design and timing of the selected action. Potential adverse effects to listed fish, designated critical habitat, and Essential Fish Habitat from ground disturbing activities causing a small and temporary increase in stream turbidity, from the risk of petroleum products entering the stream network, and from minor and localized increases in stream temperature are negligible. The overall potential for adverse effects to listed fish and their habitat will not cause impairment.

The NPS determined, and the USFWS concurred, that the proposed action may affect but is not likely to adversely affect northern spotted owls or marbled murrelets. Long-term benefits to northern spotted owls will occur more quickly than long-term benefits to marbled murrelets because owls are able to occupy advanced second-growth forest for nesting and foraging but marbled murrelets require old-growth habitat for nesting that will take centuries to develop. The long-term survival of spotted owls in the project area is uncertain due to the expansion of barred owls into the park.

The NPS determined and USFWS concurred that the Humboldt marten and California condor will not be impaired by the implementation of this project.

The selected action will have negligible adverse effects to northern spotted owls over the long-term, no adverse effects on marbled murrelets, a long-term benefit to northern

spotted owls and marbled murrelets. Therefore, the selected action will not cause impairment to threatened wildlife and fish species.

*Non-Impairment of Cultural Resources*— There are no significant historic properties or other significant cultural resources that will be affected by the selected action.

The selected action will not result in impairment of cultural resources because there are no known resources present in the project area.

#### SUMMARY

As described above, adverse effects and environmental impacts anticipated as a result of implementing the selected action on a resource or value whose conservation is necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or identified as significant in the park's general management plan or other relevant NPS planning documents, will not rise to levels that would constitute impairment of park values and resources.



## Appendix B. Errata Sheet for G-6-1 Road Removal EA

The Redwood National Park G-6-1 Road Removal Environmental Assessment was made available for public review during a 30-day period from February 20 through March 22, 2021. No public meetings were held. Two comments were received. One comment was received from a private individual and one from a permitting agency. Both were received by email and hardcopy letter to the Park.

This Errata contains corrections and minor revisions to the Environmental Assessment. Page numbers and section/sentence locations referenced pertain to the EA. The edits and corrections in this Errata do not result in any substantial modification being incorporated into the Selected Action, and it has been determined that the revisions do not require additional environmental analysis.

The Errata when combined with the EA comprises the only amendments deemed necessary for the purposes completing compliance and documentation for the project.

### TEXT CHANGES –

1. **Correction.** Change the EA page 20, Cultural Resource section, paragraph 1, 1<sup>st</sup> sentence to read: The project is located in ~~Yurok~~ Chilula ancestral territory and the NPS initiated consultation with federally recognized American Indian Tribes of the Big Lagoon Rancheria, Resighini Rancheria, Trinidad Rancheria, and the Yurok Tribe.
2. **Addition.** Add to EA page 20, Cultural Resource section, paragraph 1, after 2<sup>nd</sup> sentence and before 3rd sentence to read: Consultation with the Hoopa Tribe was initiated on March 15, 2021.

### RESPONSE TO COMMENTS –

Two comments were received during the public review period. One comment necessitated a minor correction to the Environmental Assessment as noted above in Text Changes. A substantive comment is defined by NPS Director's Order 12 (DO-12) as one that does one or more of the following:

- question, with reasonable basis, the accuracy of information in the environmental analysis
- question, with reasonable basis, the adequacy of the environmental analysis
- present reasonable alternatives other than those presented in the environmental analysis
- cause changes or revisions in the proposal

There were no substantial modifications required for Alternative 2, which has been selected for implementation. The following are NPS responses to substantive and non-substantive comments received during the public review period.

**Comment from private citizen:** Your statement that "the project is located in Yurok ancestral territory" (p. 20) is in conflict with the ethnographic record. A detailed examination of the relevant ethnographical literature indicates that Tom McDonald Creek is within the ancestral territory of the Chilula (Whilkut) tribe.

**Response:** After review of the relevant literature, it was determined that the project is within Chilula ancestral territory as stated by the commentor. The correct attribution of ancestral territory is made in this Errata sheet, and is consistent with the Cultural Resources Inventory Reports prepared in 2016 and 2019 for the project.

**Comments from North Coast Regional Water Quality Control Board:**

1. In the future, please notify the Regional Water Board of all RNP projects, including the development and completion of associated environmental analysis documents, that propose activities that have the potential to discharge waste and affect the quality of the waters of the state.

**Response:** NPS staff notified the Water Board 401 Certification Unit by email on October 16, 2020, with follow-up correspondence on October 19 and November 2 to discuss 401 permitting for this project. We were not made aware of any permit requirements at that time. With receipt of Water Board letter during the public review comment period, the NPS is now working with their staff to complete the required Federal Waiver Category B permit. The NPS and Water Board staff anticipate approval of the permit well before the start of the project.

*Response to next 5 comments from NCRWQCB after last comment:*

2. Please identify any reductions to stream shade resulting from Project activities in the Category B Federal Waiver application for the Project and provide the information required in Federal Waiver General Condition 4.
3. Pursuant to Federal Waiver General Condition 9, BMPs and the Project-specific on-the-ground prescriptions designed to comply with them must be included in the Federal Waiver Category B application for the Project. Additionally, pursuant to Federal Waiver General Condition 10, copies of the on-the-ground prescriptions and the Federal Waiver must be provided to purchasers, contractors, or other third parties.
4. Please work with Regional Water Board staff to develop a legacy sediment site treatment plan for the Project.

5. Please review the Category B Federal Waiver Application Procedures on pages 28-29 of the Federal Waiver to gain a complete understanding of the application process and requirements.
6. Please work with Regional Water Board staff to develop a plan that describes monitoring and reporting procedures that will be implemented throughout the Project to evaluate the effectiveness of the BMPs.

**Response:** Comments #2 through #6, in sum, are focused on the information required to be included in the Federal Waiver Category B permit. The NPS is working with directly with Water Board staff to ensure all elements of the project are provided in the permit. The Water Board and NPS staff anticipate successful completion and approval of the permit before the planned start date of the project.