

CHAPTER 1. PURPOSE AND NEED

1.1 Introduction

The National Park Service (NPS), in coordination with the Golden Gate National Parks Conservancy (GGNPC), is considering a management strategy for Mori Point, which is located in Pacifica, San Mateo County, on land owned and managed by the Golden Gate National Recreation Area (GGNRA) (Figure 1). Mori Point is rich in natural resources, adjacent to open space, and ideally situated to provide key links to NPS lands at Sweeney and Milagra Ridges and other recreational opportunities along the San Mateo Coast.

Because the NPS recently acquired the land, Mori Point is not specifically included in any NPS or GGNRA general planning documents. A plan is needed to ensure that all uses at Mori Point are compatible and enhance both natural and visitor resources at the site. The GGNRA is proposing to improve visitor access at the 110-acre Mori Point property by implementing restoration actions including a trail system that minimizes impacts to NPS resources and enhances recreational experiences.

This environmental assessment (EA) evaluates a No Action Alternative and three Action Alternatives and analyzes the impacts of each on the environment. The Action Alternatives analyzed are: Alternative 1, Preferred Alternative; Alternative 2, Limited Multiple-use; and Alternative 3, All Multiple-use. This document also includes discussions of alternatives that have been dismissed and the rationale for their elimination. The EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 and Council on Environmental Quality (40 CFR 1508.9), and the NPS Director's Order (DO) 12, Conservation Planning, Environmental Impact Analysis, and Decision Making, and the National Historic Preservation Act, as amended (NHPA).

1.2 Background

Mori Point was originally part of the San Pedro Spanish Land Grant and has been the site of many enterprises over the past 120 years. The Mori family, for whom the land is now named, settled in Pacifica in the 1890's and developed a farm on Mori Point. The Mori family business included the Mori Point Tavern, which operated on the site from the 1920's to 1966 when it burned to the ground in a fire. Part of Mori Point was also used as a rock quarry and the remains of sand dredging operations are still visible.

For the past 30 years, the property at Mori Point has been threatened with development. The local community, local government, and other organizations fought to protect the area and in 2002, the Trust for Public Land outbid developers at a public auction and purchased the property. Despite being privately owned, Mori Point has historically been used by the community as an urban park for hiking, bicycling, horseback riding, and dog walking. Historic land uses such as quarrying operations, in combination with other uses related to motorbike and off-road vehicles, have resulted in an altered and eroded landscape with a large network of non-designated trails. Soon after, the NPS used funds from the California Coastal Conservancy and the federal Land and Water Conservation Fund to add the 110-acre property to the GGNRA.

FIGURE 1. MORI POINT PROJECT REGIONAL LOCATION MAP



This planning effort was initiated by a grant received in 2004 from the California Coastal Conservancy to identify the optimal alignment for the California Coastal Trail through Mori Point. The grant stipulates that the planning effort would also identify secondary trails linking Mori Point to local communities and formulate measures to protect, restore, and enhance sensitive habitats and the species they support at Mori Point. Over the past year, the NPS in cooperation with the GGNPC, has gathered detailed baseline information on Mori Point's endangered species habitats, vegetation communities, invasive species locations, hydrological conditions, trail alignments, cultural resources, and recreational uses in order to develop restoration strategies, including trail alignment alternatives that address stakeholder concerns.

Creation of a continuous coastal trail was originally proposed as part of visionary legislation passed by California voters and the state legislature in the 1970s that also created State agencies to both nurture and protect the fragile and beautiful coastal environment and guarantee public access to the shoreline. The Coastal Act of 1976 required local jurisdictions to identify an alignment for the California Coastal Trail in their Local Coastal Programs. In 1972, Proposition 20 provided that, "A hiking, bicycle, and equestrian trails system shall be established along or near the coast" and that "ideally the trails system should be continuous and located near the shoreline." In 1999 and 2000 the California Coastal Trail was nominated and then designated as California's Millennium Legacy Trail by Governor Davis and the White House Millennium Trail Council. Also in 2001, the State Senate passed legislation, SB908 (Chesbro) that directed the California Coastal Conservancy in cooperation with the Coastal Commission and State Parks Department, to submit to the Legislature a plan that describes how the Coastal Trail may be completed by 2008.

1.3 Purpose and Need

1.3.1 Purpose of Taking Action

The purpose of the project is to develop a management strategy for Mori Point that meets the following goals:

- protect and enhance habitat for the federally endangered San Francisco garter snake and the federally threatened California red-legged frog;
- preserve and restore the ecological integrity of Mori Point habitats by reducing threats to native plant communities and natural processes; and
- develop a safe and sustainable trail system, incorporating the California Coastal Trail that improves recreational experiences and reduces impacts to park resources.

1.3.2 Need for Action

Past land use activities at Mori Point have resulted in accelerated erosion along the western bluffs and interior drainages, and alterations in the region's natural topography and hydrology; all of which impact natural processes, resource protection, visitor safety, public access, and visual aesthetics. The lack of a management plan at Mori Point exacerbates these conditions. Unless action is immediately taken, damage to resources would continue, increase, and worsen.

A plan is needed to protect and enhance habitat for the federally listed species at the site and develop a logical, safe, and sustainable trail system throughout Mori Point that would best provide for all visitor use, while preserving and restoring the ecological integrity of Mori Point habitats, native plant communities and natural processes. To this end, a well-defined, sustainable trail system is needed to sustainably guide visitor use and to prevent continued degradation of sensitive natural resources at the site. The ability to direct visitor use on to a defined trail system allows for the disturbed areas and potential endangered species habitat outside of the trail network to be restored and protected.

Action is being undertaken now because grant funds were received from the California Coastal Conservancy to formally designate the California Coastal Trail and secondary trail links on and through Mori Point consistent with California Coastal Trail and NPS management objectives to restore, enhance, and protect sensitive natural resources that exist at the site. Specifically, the project is needed to:

Protect and enhance habitat for the federally endangered San Francisco garter snake and the federally threatened California red-legged frog at Mori Point. As per the Endangered Species Act of 1973 (ESA), the NPS is obligated to “conserve the ecosystems upon which endangered or threatened species depend” and to conserve and recover listed species.

Preserve and restore the ecological integrity of Mori Point habitats by reducing threats to native plant communities and natural processes. This project would restore the ecological integrity of Mori Point habitats by removing impacts to habitat, improving hydrology and habitat connectivity, repairing erosion, and restoring native vegetation and wetland communities at the site.

Develop a safe and sustainable trail system, incorporating the California Coastal Trail, that improves recreational experiences and reduces impacts to park resources. The California Coastal Conservancy grant stipulates that the planning effort would also identify secondary trails linking Mori Point to local communities. The trail system incorporates popular destination points and existing trails, creation of multiple loop routes, and inclusion of several alternatives for north-south and east-west connector trails. An essential component of the new trail network is trail-use designation. Planned visitor use on formalized trails would reduce impacts to natural resources of the site.

1.4 Project Objectives

Described below are the management objectives guiding this effort.

- Protect and enhance habitat for the federally endangered San Francisco garter snake and the federally threatened California red-legged frog.
- Restore native California plant communities including an appropriate mix of wetland, coastal grassland, and coastal scrub to support the threatened and endangered species at the site.
- Remove placed fills (non-native sand/gravel/rock, asphalt, cement, clay) as appropriate.

Remove trash, debris, and illegal structures after assessing San Francisco garter snake habitat value. Replace structures with functional habitat equivalent as appropriate.

- Implement a comprehensive trail plan that would protect and enhance native habitats as well as provide safe visitor access.
- Install site improvements.
- Ensure access through site without compromising slope stability or sensitive habitat.
- Improve hydrologic and habitat connectivity between upland and wetland areas.
- Create ponds for San Francisco garter snake foraging habitat.
- Reduce human-caused and accelerated erosion to restore natural processes.
- Develop and implement a monitoring system to track progress for restoration goals.
- Engage community in the implementation of management objectives.
- Build public awareness on the appropriate use of the site, and protect habitat from unauthorized and/or destructive use.
- Build public awareness on the unique values and recreational opportunities at Mori Point.

1.5 Project Area Location

The project area is located at Mori Point in the City of Pacifica along the Pacific Coast, west of Highway 1 and south of Laguna Salada (Figure 1).

1.6 Scope of Environmental Assessment

This EA analyzes three Action Alternatives and the No Action Alternative and their impacts on the human and natural environment. It fully describes project alternatives, existing conditions in the project area, and equally analyzes the effects of each project alternative on the environment.

This EA was prepared pursuant to the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4341 et seq.), as amended in 1975 by P.L. 94-52 and P.L. 94.83. Additional guidance includes NPS Director's Order 12 (NPS, 2001a) which implements Section 102(2) of NEPA and the regulations established by the Council on Environmental Quality (CEQ) (40 CFR 1500-1508). The project must comply with requirements of NEPA as well as other legislation that governs land use, natural resource protection, and other policy issues within GGNRA.

This EA will also serve as a Biological Assessment (BA) pursuant to the Endangered Species Act of 1973 (ESA). The ESA states that, if a federal action may adversely affect a federally listed species, consultation with the U.S. Fish and Wildlife Service (USFWS) is required to

ensure that the action will not jeopardize the species' continued existence or result in the destruction or adverse modification of critical habitat. This BA serves to initiate formal consultation with the USFWS. Its purpose is to identify any endangered species or threatened species which are likely to be affected by the project and help make the determination of whether the proposed action is "likely to adversely affect" listed species and critical habitat. For the purpose of consultation with the USFWS, the NPS property boundary at Mori Point is also considered to be the "action area" (areas to be affected by the Federal action) and the NPS is considered to be the "action agency".

The following related topics are outside the scope of this EA. The GGNRA intends to conduct separate planning for these projects.

- Habitat enhancement and re-introduction of the federally endangered Myrtle's Silverspot Butterfly. This species historically occurred in grassland habitats around Pacifica, but now is considered to be extinct south of the Golden Gate Bridge. Habitat restoration and species re-introduction efforts may be pursued in the future in coordination with USFWS under a separate planning and compliance process.¹
- Dog walking. Dog walking on site will be evaluated through an ongoing federally-sanctioned Negotiated Rulemaking Process. More information on this planning process can be found at www.nps.gov/goga and <http://parkplanning.nps.gov/goga>.
- Planning or construction of connector trails outside the project area, including potential future trail to Sweeney Ridge. These efforts will be addressed in the future under separate planning efforts and compliance documentation.

1.7 Related Laws, Legislation, Management Guidelines and Constraints

Many regulations and Executive Orders are typically addressed in NEPA documents. The following is a summary of several relevant guidance documents and regulations and a description of their relationship to the Proposed Project. Other applicable regulations, plans, and standards that were taken into consideration in the development of this EA and the analysis of the impacts are located in Chapter 3.

National Park Service Organic Act

The NPS Organic Act directs the NPS to manage units "to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such a manner as will leave them unimpaired for the enjoyment of future generations." (16 U.S.C. § 1). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that the NPS must conduct its actions in a manner that will ensure no "derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress." (16 U.S.C. § 1 a-1). The Organic Act prohibits actions that permanently impair park resources unless a law directly and specifically allows for the acts. An action constitutes an impairment when its impacts "harm the

¹ This species was not considered to be present within the Project Area per the impact analysis in Section 3.5.2.1 and Appendix A.

integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources and values.” (Management Policies 1.4.3).

National Park Service Management Policies (2001)

NPS Management Policies 2001 requires the analysis of potential effects of each alternative to determine if actions would impair park resources. To determine impairment, the NPS must evaluate “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.” (Management Policies 1.4.4). The NPS must always seek ways to avoid or minimize, to the greatest degree practicable, adverse impacts on park resources and values. However, the laws do give the NPS management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment to the affected resources and values (Management Policies 1.4.3).

1980 General Management Plan for the Golden Gate National Recreation Area (GMP)

The GMP (NPS, 1980), which is the guiding plan for the park, and its corresponding EA were reviewed in the development of this EA. Mori Point is not addressed in the 1980 GMP because it was not added to the GGNRA until 2002, subsequent to GMP development. However, relevant management objectives identified in the GMP that provide useful context include:

- To offer recreational opportunities to a diversity of park users and to impart knowledge necessary for full enjoyment of park resources through a particular emphasis on interpretation, education, and information programs;
- To retain opportunities for recreation activities pursued in the park today;
- Maintaining and restoring the character of natural environment lands by maintaining the diversity of native park plant and animal life, identifying and protecting threatened and endangered plant and animal species, and other sensitive natural resources, controlling exotic plants, and checking erosion whenever feasible; and
- To recognize the importance of the cultural resources within the recreation area through a positive program of their identification, evaluation, preservation, management, and interpretation.

36 CFR 4.30, Federal Register, Vol. 52, No. 63 and Vol. 57, No. 239

These regulations specifically address bicycle use on NPS lands. Vol. 52, No. 63 states “Routes may only be designated for bicycle use based on a written determination that such use is consistent with the protection of a park area’s natural, scenic, and aesthetic values, safety considerations and management objectives and will not disturb wildlife or park resources.” Vol. 57, No. 239 states with regard to bicycle routes: “Any additional trails other than those mentioned in this preamble may be designated by the Superintendent in writing after holding public meetings through the Golden Gate Advisory Commission, by marking on maps which will be available in the office of the Superintendent and other places convenient to the public, and through the posting of trails which are open to bicycle use.” This EA serves as written determination that bicycle use on Mori Road, California Coastal Trail (CCT), CCT Bowl Connector, Fairway Trail, Upper Trail, and Bluff Trails, as described in the Preferred Alternative, is consistent with the park area’s natural, scenic, and aesthetic values, safety considerations and management objectives and will not disturb wildlife or park resources.

1.8 Issues and Impact Topics

Issues are related to potential environmental effects of project alternatives and were identified by the project interdisciplinary team (comprised of NPS and GGNPC staff and natural resources consultants). Once issues were identified, they were used to help formulate the alternatives and mitigation measures. Impact topics based on substantive issues, environmental statutes, regulations, and executive orders (EOs) were selected for detailed analysis. A summary of the impact topics and rationale for their inclusion or dismissal is given below.

1.8.1 Issues and Impact Topics Identified for Further Analysis

Issues and concerns affecting the proposed project were identified through input from individuals, organizations, federal agencies, and NPS public scoping efforts. The Proposed Project was evaluated under the GGNRA's internal NEPA process (Project Review) which included internal scoping with staff. The NPS also conducted public scoping (see Chapter 4 for a description of the scoping process). The prominent issues raised are potential impacts to visitors using Mori Point, trail use designations, trail alignments, and impacts to federally protected species and other natural resources. In response to these issues, the following relevant impact topics are analyzed in the EA: Geology and Soils, Hydrology and Water Quality, Biological Resources, Cultural Resources, Public Safety, Air Quality, Visitor Use and Recreation, Noise, and Visual Resources.

1.8.2 Impact Topics Considered but Dismissed from Further Consideration

Rationale for dismissing specific topics from further consideration is given below.

Prime and Unique Farmlands

In August 1980, the Council on Environmental Quality (CEQ) directed that federal agencies must assess the effects of their actions on farmland soils classified by the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS) as prime or unique. Prime or unique farmland is defined as soil that particularly produces general crops such as common foods, forage, fiber, and oil seed; unique farmland produces specialty crops such as fruits, vegetables, and nuts. According to NRCS, none of the soils in the project area are classified as prime and unique farmlands. Therefore, the topic of prime and unique farmlands was dismissed as an impact topic in this document.

Land Use

Mori Point is federal NPS property and therefore exempted from compliance with local policies and regulations. However, the NPS seeks to be a good neighbor and manage land in a manner supportive of local policies. The proposed action would neither change local and regional land use nor impact local businesses or other agencies. Additionally, implementation of the Action Alternatives would not affect existing land uses within the GGNRA, regardless of trail alignment or designation. Mori Point will continue to be managed as NPS land consistent with the Organic Act of 1916 "...to promote and regulate the use of the...national parks...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired

for the enjoyment of future generations."

Environmental Justice

Executive Order 12898, "General Actions to Address Environmental Justice in Minority Populations and Low Income Populations," requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low income populations and communities. The actions proposed in this analysis would not have disproportionate health or environmental effects on minorities or low-income populations or communities as defined in the Environmental Protection Agency's Environmental Justice Guidance (1998). Any temporary restriction on trail use or trail realignments would be equally applied to all visitors, regardless of race or socioeconomic standing.

Energy Resources

This project would not place an increased burden on local or regional energy resources. The project is located on open space land and the proposed actions would not require long-term use of energy resources. Construction activities associated with the project would be undertaken in an energy efficient manner.

Museum Collection

Actions proposed in this would not have a direct or indirect effect on park museums collections.

Wilderness

There is no designated Wilderness within the project area.

Hazardous Materials

A Level 1 Pre-Acquisition Environmental Site Assessment Survey (Level 1 Survey) of Mori Point was completed in 2001. This Level 1 Survey included a site inspection on September 1, 2001; completion of a NPS Level 1 Survey Checklist for Proposed Real Estate Acquisitions; interviews with the previous property owner; and a review of government agency records and historical uses of the property. The survey revealed no evidence of recognized environmental conditions or contaminants on the property and there were no obvious signs of contamination. Therefore, hazardous materials was dismissed as an impact topic.