FINDING OF NO SIGNIFICANT IMPACT MORI POINT RESTORATION AND TRAIL PLAN

National Park Service, U.S. Department of the Interior Golden Gate National Recreation Area

INTRODUCTION

This Finding of No Significant Impact (FONSI) has been prepared, in accordance with the National Environmental Protection Act (NEPA), for the Mori Point Restoration and Trail Plan, San Mateo County, California. Mori Point is a unit of the Golden Gate National Recreation Area (GGNRA). The FONSI, along with the EA and Errata Sheet, comprise the complete record of environmental impact analysis for the project.

This document describes the Selected Alternative and provides an explanation of why it will have no significant effects on the human environment. As stated in the Mori Point Restoration and Trail Plan Environmental Assessment (EA), the project will 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.

PURPOSE AND NEED FOR ACTION

The purpose of the project is to protect, preserve, and enhance federally listed species habitat and the ecological integrity of Mori Point 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.

Action is needed because Mori Point, as a recent addition to the GGNRA, is not specifically included in any GGNRA planning documents and there is no management direction to provide for resource protection and visitor use at the site. Previous land uses, which have caused severe erosion and altered hydrology, impact natural processes. The absence of a sustainable, designated trail system has left the area with a series of eroding trails that impact natural resources, resource protection, visitor safety, public access, and visual setting. Unless action is immediately taken, damage to resources would continue, increase, and worsen. Implementation of a well-defined trail system will guide visitor use away from disturbed areas, restoration areas, and potential endangered species habitat while enhancing recreational experiences at the site. Restoration actions will protect San Francisco garter snakes from trampling and predation, restore native California plant communities, increase the quantity and quality of endangered species habitat, improve hydrologic and habitat connectivity between upland and wetland areas, and reduce human-caused and accelerated erosion.

ALTERNATIVES

The EA analyzed three Action Alternatives and the No Action Alternative and their impacts on the human and natural environment. The follow objectives guided their evaluation:

- 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.

Each of the three Action Alternatives contained the same restoration and trail alignment proposal due to the need to provide the highest level of protection for the federally listed species on the site. The resulting opportunities for trails left one system that best accommodated user circulation needs. Therefore, the alternatives differed only in trail-use designation. All trails were evaluated for suitability for uses over and above hiker-only.

The Preferred Alternative offers a variety of trail experiences to different user groups and meets management objectives to protect and enhance natural resource values and provide public access. Hiker-only designations would be in effect on all segments through, or leading to, steep and erosion-prone areas. Multiple-use opportunities (hiking, bicycling, and equestrian uses) were identified on the California Coastal Trail (CCT) and its main connector routes.

The second alternative (Limited Multiple-use) proposed that only Mori Road, the California Coastal Trail, and California Coastal Trail Connector be designated for multiple-use. All other trails would be hiker-only. The third alternative (All Multiple-use) designated all trails as multiple-use, with no restrictions on biking, hiking, or equestrian use.

The fourth alternative was the No Action alternative. Under this alternative, only the management practices that have been previously approved by the US Fish and Wildlife Service (USFWS) would continue. These include posting interpretive signs, constructing up to four

artificial ponds for San Francisco garter snake breeding habitat, removing small pampas grass plants, lopping pampas grass inflorescences (flower- or seed-heads) to reduce germination of new plants, pulling French broom plants in locations without rodent burrows, and conducting limited erosion control. Trails would remain non-designated and no trail removal, trail construction, or trail improvement would occur.

SELECTED ALTERNATIVE

The NPS selects Alternative 1 for implementation. Several minor changes were made as a result of public comments and agency review. These changes were made to the alternative as described in the EA and these modifications are detailed below. There are several components to the Selected Alternative: Site-wide Management Actions (which include restoration of three specific areas and trail alignment), Long-term Stewardship actions, and trail use designation.

Site-wide Management Actions

Action 1: Protect San Francisco garter snakes from trampling and predation.

This involves minimizing vehicular access to Mori Road, installation of exclosure fencing, and construction of a boardwalk, bridge, or raised road with causeways to accommodate snake and frog movement. This action will also protect California red-legged frogs from predation from bullfrogs (*Rana catesbeiana*) by guarding against their establishment at Mori Point, and working with U.S. Fish and Wildlife Service to determine a plan for controlling them, if they become established. Feral cats that prey on small mammals, birds, and reptiles at Mori Point would be captured live and taken to nearby humane societies.

Action 2: 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.

An appropriate mix of wetland, riparian, and open grassland, and coastal scrub habitats will be created to support the threatened and endangered species at the site. Non-native plant and tree species would be removed and the area restored.

Action 3: Remove placed fills and remove trash, debris, and illegal structures after assessing San Francisco garter snake habitat value. Replace structures with functional habitat equivalent as appropriate.

Fill and structures would be removed if deemed necessary to the aesthetic and ecological integrity of the site and if removal would not impact sensitive species. Sites would be rehabilitated and revegetated as needed.

Action 4: Implement a comprehensive trail plan that would protect and enhance native habitats as well as provide safe visitor access.

The implementation of a comprehensive trail plan would minimize vehicular, pedestrian, bicycle, equestrian, and dog traffic in the most sensitive San Francisco garter snake habitats, while enhancing the visitor experience. An upgraded trail system would supply a variety of loop trails leading to popular destination points. Resource protection would be primarily achieved through

methods such as fencing, signage, trail markers, re-vegetation, turnpikes, and/or boardwalk to ensure smooth flow and protect the sensitive habitats at the site.

Action 5. Installation of additional site improvements.

Possible site improvements may include, but are not limited to, the following: public safety, regulatory, interpretive, and wayfinding signage; accessible site furnishings (e.g. benches and picnic tables); accessible toilets; vault or other method; bicycle racks; trailhead improvements such as kiosks, waysides, or landscaping improvements; parking improvements and definition/designation of parking spaces; and limited fencing for safety or to protect sensitive habitat.

Action 6. Restoration of three specific areas.

Special Restoration Area A: Ensure access through Special Restoration Area A without compromising slope stability or sensitive habitat. A study would be conducted in association with the final trail design to outline the main drainage pathways and contributing drainage areas to determine treatment for water pooling along trails under existing and proposed project conditions. Recommendations would likely involve smoothing the trail, adding a permeable top surface, and de-watering the trail by installing drains and other devices.

Special Restoration Area B: Improve hydrologic and habitat connectivity between upland and wetland areas and create ponds for San Francisco garter snake foraging habitat. A human-constructed berm running parallel to the road that separates upland and wetland habitats will be removed in phases to create habitat and hydrologic connectivity. This water will either flow directly into the lower wetland area or be diverted into another constructed pond. A raised, drivable boardwalk or bridge along this section of road will allow for safe movement of the San Francisco garter snake and other small animals under the structure. The berm on the south side of the road will also be breached in the vicinity of the boardwalk/bridge, allowing water to flow under it, providing for a drier and more aesthetically pleasing path for visitors to walk to the seawall and adjacent trails. This boardwalk/bridge will begin near the eastern edge of the West Fairway Park housing development and end near the western end of the newly constructed pond. It would remain drivable to allow for emergency and other maintenance-related vehicle access.

Additional seasonal ponds would be created in up to five locations both north and south of Mori Road or near Sanchez Creek. The ponds may be maintained by periodically removing sediment or by creating an upstream sediment detention basin. Sediment removal would be restricted to late summer or fall periods when the San Francisco garter snake is not using the ponds.

Special Restoration Area C: Reduce human-caused and accelerated erosion to restore natural processes. In Area C, to reduce human-caused and accelerated erosion above the Bluff Trail, the grade would be recontoured beginning at the ridge top and continuing down the western slope within the gully areas. All topsoil from the recontoured site would be recovered and placed on scarified sites to restore original natural contours. All debris encountered during excavation would be removed from the site. Check dams would be installed in gullies over two feet in depth to erase hydrologic memory. Soil from the fill site areas would be placed in the gullies and compacted. All finished contours of grade exceeding 15 percent would be stabilized by covering

with erosion matting or certified weed free rice straw and securely fixed in place. Once natural contours and drainage patterns have been established, the site may be revegetated in order to further stabilize the soil.

Long-term Stewardship Actions

Action 1: Maintain trails.

The GGNRA would conduct regular maintenance of the new and restored trail segments, including trimming of trailside vegetation, replacement of trail base material, and possible localized soil disturbance (such as to repair erosional features or construct water bars). Maintenance activities would also include the monitoring, repair, and/or replacement of attendant features such as fencing, signs, trail markers, turnpikes, and boardwalks.

Action 2: Continue to restore native plant communities.

The GGNRA plans to continue active restoration within selected portions of the project area; restoration actions would be conducted as described under Site-wide Management Actions.

Action 3: Develop and implement a monitoring system to track progress for restoration goals. Photo-monitoring would be conducted on a site-wide and project-specific level as necessary. Periodic invasive plant species surveys will track their expansion and/or decline. Monitoring and survey work for the California red-legged frog and the San Francisco garter snake will also be conducted.

Action 4: Engage the community in the implementation of management objectives. Community members would be invited to participate in the implementation of appropriate management activities through active outreach, education, and stewardship efforts. Volunteer programs and educational partnerships would be broadened, and regular opportunities for community participation would be offered at the site. The GGNRA would continue to cultivate relationships and coordinate its management efforts with adjacent landowners, local non-profits, other agencies and local community members.

Action 5: Build public awareness on the appropriate use of the site, and protect habitat from unauthorized and/or destructive use.

The GGNRA would make efforts to educate visitors on the appropriate use of the site, particularly in endangered species habitat, using those education activities described in Action 6, below. The GGNRA would integrate local community support in education and enforcement efforts. Educational signage and protective fencing may also be used to protect sensitive areas from disturbance.

Action 6: Build public awareness on the unique values and recreational opportunities at Mori Point.

To build public awareness, the GGNRA and/or its partners would offer educational walks and related programs on both the cultural and natural resources found at Mori Point. In addition, outreach and education materials would be developed and the existing on-site bulletin board would be maintained and updated regularly. Regular volunteer workdays would be offered for

community members interested in hands-on learning and experiences. The GGNRA would also partner with other organizations to assist with public education efforts. To the extent that resources become available, educational efforts would extend into the schools through presentations and on-site field trips. Opportunities to engage the media would also be pursued.

Trail Alignment

The northernmost entryway to Mori Point will be Fairway Drive. The Fairway Trail will run south, paralleling the backyard fences, to connect with Mori Road. The existing access trail, which begins just south of the Fairway Drive entrance and connects to Mori Road near the bulletin board will be decompacted and revegetated in order to reduce habitat fragmentation. The Fairway Drive entrance will lead into the heart of Mori Point, the intersection of the wetland habitats, and the upland "Bowl" area, at which point several trail options exist.

At the north-westernmost park entrance from the sea wall, visitors will have a choice of two California Coastal Trail (CCT) segments, each providing a north-south passage through Mori Point. The CCT Coastal Connector climbs up the coastline and approximately follows the route of the informal paths that already parallel the coast, but will be improved with the (possible?) addition of stairs. This trail will connect with the remainder of the north-south CCT near the undesignated trail leading to Mori Point proper where an overlook will be established. Another less strenuous trail will begin at the intersection of the sea wall and Mori Road. Visitors may follow Mori Road inland and then ascend gradually on the CCT Bowl Connector toward the south, largely along an existing road that would be narrowed to appropriate trail width. The CCT Bowl Connector will switchback to the west via an improved existing trail where it would intersect with the Bluff Trail, the Peak Trail, and the Point Trail. The CCT would continue southeast along an improved existing trail through a stand of intact coastal scrub just north of Mori peak. Upon reaching Mori Ridge, the CCT would descend southward onto private land.

From the east, visitors may access the site through two entrances: at the junction of Mori Road close to Highway 1 or through the gate at Mori Road. The easiest route and one of the most popular, to the center of Mori Point is along Mori Road. Conversely, the trailhead closer to Highway 1 leads to the Upper Trail, which parallels Mori Road and offers a more natural experience and an alternate route to access the western part of the site. Visitors can remain on fairly level ground by using the Upper Trail, a narrower and improved version of the already extant roadway, heading west towards the Bowl (a sensitive wildlife area). Upon reaching the Bowl, one can turn north along an improved existing trail (Bowl Trail) to reach Mori Road, or turn south along the Bowl Trail, a contour trail that skirts the perimeter of Mori's most sensitive upland habitat to connect to the CCT Bowl Connector. The Bowl Trail is comprised of improved existing trail and new trail that follows the Bowl's natural topography. A raised, drivable short boardwalk or bridge may be constructed along this section of Mori Road. The boardwalk/bridge would begin near the eastern edge of the West Fairway Park housing development and end just west of the newly constructed pond on Mori Road.

Alternatively, a more challenging and scenic route from the easternmost part of the park exists by way of a series of stairs running up to the Crest Trail where an improved existing trail will follow

the ridgeline directly west to intersect with the CCT. At this intersection, one can turn north or south on the CCT, or follow the Peak Trail to climb to the summit of Mori's highest vantage point. From the summit, the Peak Trail continues downslope to connect with the Bluff and other trails. The northern intersection of the Peak Trail and the CCT is the gateway to two of Mori Point's most popular destinations - the coastal bluffs and Mori Point proper. (Note: Trail names are temporary and for planning purposes only.)

Accessibility

All trails were evaluated for opportunities to comply with Architectural Barrier Act Accessibility Standards (ABAAS) and the proposed accessibility guidelines for Outdoor Developed Areas as published in the final report of the Regulatory Negotiation Committee on Accessibility Guidelines for Outdoor Developed Areas. Alterations of existing trail alignments at Mori Point are severely constrained by steep terrain, extremely large boulders, and threatened and endangered species habitat and other critical cultural-natural resource protection needs. New trails segments which are constructed, as well as repairs to or rehabilitation of existing trails, where feasible will meet outdoor accessibility guidelines.

Trail Use Designation

In the Selected Alternative, 1.26 miles of hiker-only trail would be in effect on all segments through, or leading to, steep and erosive areas. This includes the Crest Connector Trail, CCT Coastal Connector, Point Trail, Peak Trail, and Crest Trail. A total of 2.26 miles of multiple-use trails would include the California Coastal Trail and its main connector routes: Mori Road, the CCT Bowl Connector, the Bowl Trail, Upper Trail, Fairway Trail, and the unimproved Bluff Trail.

Modifications to the Selected Alterative

Due to some slope failure that occurred during the winter 2006 storms, a portion of the hikeronly CCT segment as it ascends from the seawall and intersects Mori Point has been rerouted around the slumped area. This change is minor and would not be discernable on a trail map. Other similar small changes to the trail alignment may be needed, due to winter weather conditions and erosion.

In addition, the multi-use segment of the CCT as it leaves Mori Road was changed slightly due to the steepness of the slope; the trail will turn to reduce the grade. Detail will be determined upon final design. These changes do not create new or additional impacts to those evaluated in the EA. A revised trail map, noting this minor change, is depicted on the following page.

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Environmental Assessment

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The National Park Service (NPS) has determined that the environmentally preferred alternative for this project is Alternative 1, the Preferred Alternative. The environmentally preferred alternative is the alternative that will promote the national environmental policy expressed in NEPA (sec. 101 (b)). This includes alternatives that:

- Fulfill the responsibilities of each generation as a trustee of the environment for succeeding generations.
- Ensure for all Americans safe, healthful, productive, and esthetically 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, whenever possible, an environment that supports diversity and variety of individual choice.
- Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.
- Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The Council on Environmental Quality Regulations (CEQ) regulations implementing NEPA and the NPS NEPA guidelines require that "the alternative or alternatives which were considered to be environmentally preferable" be identified (Council on Environmental Quality Regulations, Section 1505.2). 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 Selected Alternative meets all of the NEPA criteria and would have the greatest benefits to natural and visitor resources at the site. The project includes habitat restoration and protection for federally listed species, improving hydrologic and habitat connectivity, long-term stewardship actions while creating safe and sustainable access of the site for visitors.

PUBLIC INVOLVEMENT

Public scoping was conducted between October 7, 2005 and November 7, 2005. GGNRA received and considered comments after that date. The project was reviewed by interdisciplinary staff of the Golden Gate National Recreation Area (GGNRA) at an internal Project Review meeting on November 30, 2005 and July 26, 2006 and by the GGNRA Historic Assessment Group on March 29, 2006.

On October 6, 2005, a notice announcing the beginning of public scoping for the project was mailed to more than 1,500 individuals, agencies, and organizations, the Fairway West neighborhood and nearby residents, Golden Gate National Park Conservancy's Site Stewardship Program mailing list, and the Parkwide GGNRA mailing list. The notice was posted on the bulletin board at Mori Point. Press releases were sent out to area newspapers which resulted in one article

in the Pacifica Tribune on October 12, 2005. A public open house was conducted in at the Pacifica Community Center, Pacifica, CA on October 25, 2005 and the project team hosted an Informational Walk at the project site on October 29, 2005. Seventeen people signed in at the public meetings, though approximately 30 individuals attended. Fourteen people attended the public field trip. Thirty-seven individuals provided a total of 134 comments. Comments were submitted in writing at public meetings and via email, mail, and through the PEPC website. The GGNRA considered all public comments.

Scoping comments were diverse and focused on communication and coordination issues, trail alignment, dogs, trail design, natural resource issues, interpretation of the area, and installation of site amenities. Comments asked that the NPS coordinate with bicyclists, the Pacifica City Council, GGNRA Liaison committee, City and County Law Enforcement, and the USFWS, The Peebles Corporation, and San Francisco Department of Recreation and Parks. There were many comments regarding trail alignment and use. As a result, the trail alignment presented during scoping was redesigned to incorporate the public comments.

Public comment also advocated for unpaved trails that would provide accessible and safe hiking; be open to multi use and some hiker only, on and off-leash dog walking, cycling, and horseback riding; and include a single-track loop for cycling. Some favored more signs and fences; others wanted these items to be kept to a minimum. The public requested that the NPS remove unsightly concrete debris and structures as well as the drainage pipe and concrete footings on beach. Some noted that protection of wildlife and habitat restoration should be a top priority; others felt that Mori Point should emphasize recreation rather than restoration. Use of recreational vehicles was discouraged. Other natural resource comments related to NPS control of bullfrogs and feral cats, minimal herbicide use, removal of invasive plants and reintroduction of native plants, and cautioned that the NPS not compromise slope stability on Mori Road. Public comment both supported and did not support construction of additional ponds for habitat. The importance of mosquito control was also noted. It was requested that the NPS provide trash cans and picnic tables; other comments discouraged picnic tables. Comments also encouraged good interpretation of the site. All scoping comments were considered in the development of the EA.

The EA was available for public review and comment from February 23 through March 31, 2006. Public notice of the availability of the EA was provided to individuals, organizations, and agencies through notification on the park website (http://parkplanning.nps.gov/goga), mailing of the EA (29), and a postcard/email notice (1,920). The EA was sent to four local libraries: San Francisco Civic Center, Pacifica, Millbrae, and San Mateo. The EA was discussed at a GGNRA Park Public Meeting on February 28, 2006. An article inviting public comment appeared in the Pacifica Tribune on March 8, 2006. The NPS received 42 comments on the project from individuals, the GGNRA [Pacifica] Liaison Committee, Responsible Organized Mountain Pedalers (ROMP), Coastwalk, and the California Coastal Conservancy.

Comments on the EA focused on alternatives, resource protection and restoration, the trail plan and implementation, outreach and education, and other site uses. The majority of comments (78%) noted preference for a particular trail use designation. Comments supported protection of sensitive habitat, provided comments on trail construction, and questioned the extent of tree

removal. One letter noted that further evaluation of paragliding was needed before dismissing it as an alternative. A change to the text was made to address this issue (see Errata). One letter was received from the State Clearinghouse, which stated that no state agencies submitted comments on the project. Other summarized comments and NPS responses are provided in the Errata.

AGENCY CONSULTATION

U.S. Army Corps of Engineers

Pursuant to Section 404 of the Clean Water Act (33U.S.C. 1344), the U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged or fill material to Waters of the U.S., including wetlands. On February 7, 2006, GGNRA sent the USACE the wetland delineation to determine if there are any jurisdictional wetlands that may be affected by proposed project activities resulting in the "fill" of Waters of the U.S. After site visits with the USACE, the NPS submitted revised delineation, maps, and data points on June 7, 2006. The NPS received a map confirming USACE jurisdiction on June 22, 2006. On July 31, 2006 the NPS sent the USACE a Pre-Construction Notification and request to proceed under Nationwide Permit 27 (NWP), Street Restoration Activities. The NPS received a letter of concurrence and approval to proceed under NWP 27 on August 25, 2006 [File Number 300875S].

San Francisco Bay Regional Water Quality Control Board

The Regional Water Quality Control Board (RWQCB) is responsible for taking certification actions for activities subject to any permit issued by the USACE pursuant to Section 404. On March 17, 2006, the NPS applied for a Water Quality Certification for the project. A Conditional Water Quality Certification was issued on June 12, 2006. [File No. 2178.07 (HTK)].

U.S. Fish and Wildlife Service

Under Section 7 of the federal Endangered Species Act as amended, PL 93-205, 87 Stat. 884, 16 USC §1531 et seq., federal agencies are required to consult with the USFWS if their actions, including permit approvals, could adversely affect an endangered or threatened species, or its critical habitat. The GGNRA conducted informal consultation with USFWS by conducting meetings to discuss the project on September 13, 2005 and September 28, 2005, and through ongoing and regular correspondence between USFWS staff and GGNRA natural resource staff. The NPS initiated formal consultation on the Restoration and Trail Plan on February 24, 2006 with submittal of the EA, which also served as a Biological Assessment. The USFWS issued a Biological Opinion, which included an Incidental Take Statement, on July 13, 2006 [File #: 1-1-06-F-1575]. Reasonable and Prudent Measures as stated in the BO are included in the Mitigation Table in Appendix A.

California Coastal Commission

GGNRA sent a letter to the California Coastal Commission on December 19, 2005 requesting a Negative Determination for the project, in accordance with the Coastal Zone Management Act of 1972, as amended, Section 307c(1). On March 9, 2006, the NPS received a letter from the Coastal Commission stating concurrence with the negative determination that the proposed project will not adversely affect coastal zone resources [ND-117-05].

Advisory Council on Historic Preservation and California State Historic Preservation Officer
The National Historic Preservation Act of 1966, as amended PL 89-665, 80 Stat. 915, 16 USC
§470 et seq. and 36 CFR 18, 60, 61, 63, 68, 79, 800, requires federal agencies to consult with the
Advisory Council on Historic Preservation (ACHP) and the State Historic Preservation Officer
(SHPO) regarding undertakings that may affect properties listed in or eligible for listing in the
National Register of Historic Places. In 1992, Golden Gate National Recreation Area entered
into a Programmatic Agreement with the ACHP and the SHPO which allows park staff from the
GGNRA Preservation Assessment Group to review undertakings for National Historic
Preservation Act conformance as long as such undertakings are found to have No Effect or No
Adverse Effect on properties listed in or eligible for listing in the National Register of Historic
Places. The Selected Alternative was reviewed and certified by the Preservation Assessment
Group on March 29, 2006. The review resulted in one project stipulation to consult with Park
Archeologist on any work to be carried out in the archeological sensitivity zone well in advance
of such work taking place. This condition was added as mitigation for the project.

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

The NPS used the following NEPA criteria and factors defined in 40 CFR §1508.27 to evaluate whether the Selected Alternative would have a significant impact on the environment.

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS. Whether taken individually or as a whole, the impacts of the project do not reach the level of significance. Many of the adverse impacts would be temporary and occur during construction. Other adverse impacts would be both short and long term; direct, indirect, and cumulative; and negligible to minor impacts. These adverse impacts would occur to geology and soils, hydrology and water quality, wildlife, vegetation, wetlands, recreation and visitor use, soundscape, and visual resources. Adverse impacts to federally listed species on site (San Francisco garter snake and California red-legged frog) will be short and long term, direct and indirect, and minor to major. However, with implementation of mitigation measures and Best Management Practices outlined in the EA, these adverse impacts would be less than significant. The USFWS Biological Opinion for the project stated that the selected alternative "is not likely to jeopardize the continued existence of either of these species." There will be no adverse impacts to cultural resources and only temporary negligible impacts to air quality as a result of construction.

The Selected Alternative would also have long-term, minor to major beneficial effects on the human environment. Revegetation, trail construction/removal/improvements, erosion repairs, berm removal, and boardwalk/bridge construction will provide long term beneficial impacts to geology and soils. Restoration of surface water channels and wetlands would benefit water quality and hydrology. Site-wide Management Actions would result in long-term direct beneficial impacts to wildlife, vegetation, and wetlands. Locally the project would produce a net increase of over 13.3 acres of native plant habitat resulting from 4.1 acres of non-designated trail removal, 5.0 acres of erosion repair, 3.3 acres of soil decompaction and planting, and 0.8 acres of debris and fill removal. Up to five ponds (0.4 acres) would be created for listed species habitat.

The project has many long-term beneficial impacts: improved trail and site conditions, access to popular destination points on safe trails, a balanced experience for all users, and improved aesthetics. Long-term benefits will result from improved hydrologic connections between wetlands, uplands, and ponds. This connectivity would help to stabilize aquatic resources that have historically been fragmented. This would result in an approximate 5:1 mitigation ratio of restored to impacted habitat for permanent impacts. Long-term Stewardship Actions, such as invasive species removal, will occur throughout the site, thereby improving habitat quality of all 110 acres. Benefits to cultural resources will be obtained from the interpretation of indigenous, historic, and recent uses of Mori Point. The Selected Alternative would benefit Public Safety as well, as trail would be constructed to NPS trail standards, signed to promote safe use, and the removal of non-designated trails, stabilization of erosion areas, and removal of debris would reduce overall potential hazards to visitors.

Degree of effect on Public Health or Safety.

Adverse impacts on Public Health and Safety would be negligible. Public health and safety issues were related to mosquito control from pond creation/expansion and visitor safety during construction. Coordination with the San Mateo County Mosquito Abatement District (SMCMAD) indicated that the contribution of the small frog ponds would be minor compared to the overall production of mosquitoes from the Laguna Salada, Horse Stable Pond, and creek/wetland complex. However, as per recommendation from the SMCMAD, GGNRA would monitor mosquito populations and apply *Bacillus thuringensis* if needed. Application of this biological control agent would mitigate this issue. Overall, the Selected Alternative will promote safe trail use, stabilize dangerous eroded areas, and reduce potential hazards to visitors.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The project area consists of public open space that lies between the Pacific Ocean and Interstate Highway 1 to the west and east, respectively. The Sharp Park Golf and Laguna Salada wetlands are to the north; private property and wetlands are located to the south. Despite previous and disturbance at the site, Mori Point contains wetland habitat for the San Francisco garter snake and the California red-legged frog, two federally listed species. At maximum, the temporary construction impacts in wetlands would be approximately 0.60 acres; permanent impacts would total 0.05 acres. There will be no loss of wetlands. Consultation has occurred with appropriate regulatory agencies and work will be completed in compliance with all permitting requirements. Any discharge into the special aquatic sites (wetlands) is expected to be de-minimus. The project area is not in proximity to historic/cultural resources, prime farm lands or wild and scenic rivers.

Degree to which effects on the quality of the human environment are likely to be highly controversial.

The project effects on the quality of the human environment are not highly controversial but some members of the public may show disfavor for the selected trail use designation. Both comments from scoping and on the EA were supportive of the overall plan; however, preferences for trail use designation among each interest group varied. The project will provide opportunities

for all user groups to enjoy the site while still preserving sensitive habitat areas. The plan presents a balance of the public comments. No use is excluded, and there are ample opportunities for bicyclists, hikers, and equestrians to enjoy Mori Point. Some public comments noted a preference that (on or off-leash) dog walking be permitted at the site. This topic was not included in the scope of this EA; it will be addressed in the GGNRA Dog Management Plan and Negotiated Rulemaking that is currently underway in a separate planning process.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.

The potential impacts are well defined and analyzed in the Mori Point Restoration and Trail Plan EA. The degree or possibility that the effects on the human environment will be highly uncertain or will involve unique or unknown risks is remote.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The Selected Alternative will not predetermine or establish a precedent for future actions with significant effects at Mori Point and does not represent a decision in principle about a future consideration. Future actions and decisions at Mori Point not identified in this EA will be reviewed in an independent NEPA analysis.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

The EA considered the cumulative impacts of the Selected Alternative with several past, present and ongoing future projects. The analysis for all impact topics indicated that the Selected Alternative could result in minimal but not collectively significant cumulative effects.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The GGNRA thoroughly investigated cultural resources as part of the environmental analysis. This information and archaeological surveys of the Mori Point Area of Potential Effect resulted in the identification of many modern features, mainly associated with quarrying operations at the Point within the last 60 years. These properties are considered historically insignificant and ineligible for listing on the National Register of Historic Places (NRHP). No historic or prehistoric sites were found that would be impacted by the Mori Point project.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat.

Several listed species could occur at Mori Point, but in the July 13, 2006 Biological Opinion, the USFWS determined that the project is likely to adversely affect only two species: the endangered San Francisco garter snake and threatened California red-legged frog. USFWS found either lack of sufficient habitat or insufficient evidence of the other species in the project area. After reviewing the current status and environmental baseline for the San Francisco garter snake and California red-legged frog, cumulative effects on the species, and effects of the proposed project,

the USFWS determined that the Selected Alternative is not likely to jeopardize the continued existence of either species. Critical habitat has been designated for the California red-legged frog, but is not located in the action area. Critical habitat for the San Francisco garter snake has not been proposed or designated; therefore none will be affected by the proposed project. The Biological Opinion contains numerous measures to address the short and long-term minor to major adverse impacts to the species. These measures, together with the mitigation and Best Management Practices listed in the EA will ensure impacts to the species remain less-than-significant.

Whether the action threatens a violation of Federal, state, or local environmental protection law

Implementing the Selected Alternative would violate no federal, state or local environmental protection laws. Assessment of the proposed action has been performed pursuant to the National Environmental Policy Act, which requires consideration of environmental protection laws and regulations.

IMPAIRMENT

In addition to reviewing the list of significance criteria, the National Park Service has determined that implementation of the Selected Alternative and mitigation measures will not constitute an impairment to GGNRA's resources and values. There would be no major adverse impacts to a resource or value whose conservation is 1) necessary to fulfill specific purposes identified in the park's establishing legislation; 2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or 3) identified as a goal in the park's general management plan or other relevant NPS planning documents. This conclusion is based on a thorough analysis of the environmental impacts described in Mori Point Restoration and Trail Plan Environmental Assessment, the mitigation measures, agency consultations, considerations of the public comments received, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS Management Policies 2001.

MITIGATION MEASURES

Mitigation measures are included as a key component of the Selected Alternative and will be completed by the NPS/GGNRA, Golden Gate National Parks Conservancy, and its contractors and volunteers. Mitigations are listed below. Reasonable and Prudent Measures were provided by the USFWS as a result of consultation. These items were not identified in the EA but added to the mitigation table on the following page.

Mori Point Restoration and Trail Plan Mitigation Measures	Responsible Party
GEOLOGY AND SOILS	
GGNRA would prohibit construction activities in any site area with seismic hazards until geologic and soil conditions of the site are investigated and appropriate mitigation measures, if any, are incorporated into development/restoration plans.	NPS Project Manager
HYDROLOGY AND WATER QUALITY	
*Construction will be limited to the dry-weather months.	NPS Project Manager
Appropriate design would drain surface water from the trail to avoid ponding and development of soft, muddy surfaces that can lead to soil degradation and water quality impacts.	NPS Project Manager
Erosion and sediment control measures would be implemented where project actions could leave soils exposed to runoff prior to revegetation. Erosion control measures would be installed wherever necessary during construction to eliminate the potential for sediment discharge into stormwater, wetlands, and creeks.	NPS Project Manager
*Stockpiles and disturbed soils will be properly covered with appropriate erosion and sedimentation control measures to minimize impacts to water quality.	NPS Project Managers, Golden Gate National Parks Conservancy (GGNPC) Project Managers, Contractors
*Heavy equipment shall be kept outside of wetlands and environmentally sensitive areas to avoid impacts to waters of the State and degradation of habitat value	
Areas disturbed by equipment or vehicles will be rehabilitated as quickly as possible to prevent erosion, discourage the spread of nonnative plants and address soil compaction.	
*All debris and construction wastes shall be kept outside the wetlands and other waters of the State and properly disposed of to an offsite facility.	
*Upon completion of the project, the NPS will restore and revegetate the work area and all disturbed soils adjacent to the project site to their natural pre-construction conditions. Only local native plants will be used in revegetation.	
VISITOR SAFETY	T
As per recommendation from the San Mateo County Mosquito Abatement District, monitoring of mosquito populations will be implemented and <i>Bacillus thuringensis</i> would be applied if needed.	NPS & GGNPC Project Managers, NPS aquatic biologist
Advanced notification of construction work, detour signage, and construction fencing will be implemented to restrict visitors from hazardous areas during construction.	NPS & GGNPC Project Managers
VISITOR USE AND RECREATION	
Hours of construction using heavy equipment will be limited and restricted between the hours of 8:00 p.m. until 7:00 a.m. and would not	NPS & GGNPC

occur on weekends. Trails will be detoured during construction.	Project Managers
NOISE	
Use of powered construction equipment will comply with the City of Pacifica Municipal Code, Sec. 5-10.03. Enumerated, which prohibits construction noise at night from 8:00 p.m. until 7:00 a.m. Neighbors would also be given notice prior to any construction activities.	NPS & GGNPC Project Managers, Contractors
Equipment and trucks used for construction should utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds, and installation of sound blanket around the project site, wherever feasible and necessary). Construction vehicles should be properly maintained and equipped with exhaust mufflers that meet state standards.	
Impact tools used for construction should be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used. External jackets on the tools themselves and quieter procedures should be used wherever feasible.	
Construction vehicles and equipment will not idle when not in use.	
CULTURAL RESOURCES	
The project team will consult with the GGNRA archaeologist well in advance of any work that will be conducted in archaeologically sensitive areas. If archaeological materials are recovered, project monies must fund preservation, cataloguing, storage, equipment, and materials needed.	NPS & GGNPC Project Managers, NPS Archaeologist, Contractors
BIOLOGICAL RESOURCES	
All vehicles will be brought in cleaned and free of weeds to prevent the spread and/or introduction of invasive plant species.	NPS & GGNPC
Soils and vegetation contaminated with weed seeds would be segregated and disposed of or treated as appropriate. At the discretion of a qualified biologist, restrictions will be placed on the movement or deposition of fill, rock, or other materials containing weed seed or viable plant cuttings to areas relatively free of weeds.	Project Managers, Contractors
No earthmoving work shall occur in the vicinity of the "Bowl", existing ponds or wetlands between November 15 and April 15, the breeding season for California red-legged frogs and the season when San Francisco garter snakes are inactive in their winter burrows.	
Vegetation in all construction areas will be progressively cut to a height that would allow for a visual search of the snake and checked for presence of snakes prior to ground-disturbance and construction equipment or vehicles entering the sites. Once vegetation is cleared, a pre-construction survey for the San Francisco garter snake will be conducted in the impact area.	
Prior to construction near wetlands or ponds, exclusion fencing will be constructed. All rodent burrows in constructions areas where soil or fill will be removed or placed, will be hand excavated until the burrows terminates or until a maximum depth of 30 centimeters. Exclusion fencing gates will be closely monitored throughout construction to ensure no snakes enter the area	
Speed limits of 10 miles per hour will be posted on all access roads.	

A qualified biologist will inspect for snakes and frogs underneath any vehicle that is parked for 30 minutes or more, immediately prior to moving the vehicle.	NPS & GGNPC Project Managers,
Personnel who detect any suspected San Francisco garter snake or California red-legged frog on-site will immediately report their finding to a qualified biologist for positive identification. Non-permitted personnel will not attempt to capture or move any snake or frog detected. If the qualified biologist determines that the animal is not a San Francisco garter snake or California red-legged frog, the qualified biologist may hand capture and move the animal to suitable habitat outside the construction area. If the qualified biologist determines that the detected animal is a San Francisco garter snake or a California red-legged frog, or is unable to positively identify the animal, then the qualified biologist will notify the permitted biologist for appropriate action.	Contractors & Volunteers
A biologist holding a valid Scientific Collection Permit from the U.S. Fish and Wildlife Service will be on-site or on call to handle any San Francisco garter snakes or California red-legged frogs encountered during pre-construction and construction activities. Only a holder of a valid Scientific Collection Permit from the USFWS will handle San Francisco garter snakes. California red-legged frogs will only be handled by a holder of a valid Scientific Collection Permit from the USFWS or a USFWS-approved biologist.	Contractor
All excavated holes and trenches will be either covered at the end of the workday, ramped or escape boards will be placed in trench to allow any animals to escape. Trenches will be inspected each morning and late afternoon by a qualified biologist as well as before the trench is filled.	NPS & GGNPC Project
Invasive non-native plant removal involving ground disturbance would be conducted as follows so that any San Francisco garter snakes that may be hiding in vegetation can escape unharmed. First, search each clump or patch thoroughly for snakes. If a San Francisco garter snake is found, disturbing it is likely to make it hide more deeply in the vegetation, therefore, leave the clump or patch alone and check it again on a later day. If no San Francisco garter snake or California red-legged frog is found, vegetation will be progressively cut and searched to 1 to 2 feet above ground level. If no San Francisco garter snake is found, the remainder of the clump or patch can be removed. Prior to removal of vegetation, the site will be surveyed for underground burrows. In those areas where no burrows are found, the plant may be removed by hand using a weed-wrench or other digging tool. Wetlands will be monitored for invasive aquatic species and removal will be conducted when needed.	Managers, Contractors
If vegetation-removal work is anticipated during the bird-nesting season, vegetation shall be removed to a height of less than 8 inches prior to the nesting season (March 1st through July 31st) and maintained at height less than 8 inches throughout project activities to discourage nesting. If work is necessary during the nesting season, a qualified biologist must conduct a pre-project survey for nesting birds and determine that birds are not nesting within the project area. All pre-project surveys would be conducted by qualified individuals and coordinated with the GGNRA wildlife ecologist. If nests are found, appropriate buffers (where construction work could not occur) would be established around nest sites. Buffers would be maintained until birds fledged and young birds were mobile enough to move out of the area, or nests failed. Buffer size would be determined based on species and nest site characteristics and proposed construction actions in coordination with the ggnra wildlife ecologist.	NPS & GGNPC Project Managers, NPS biologist, Contractors
In order to protect nesting raptors, trees shall not be removed between January 1 st and July 31 st unless qualified personnel conduct a pre-project survey for nesting birds and determine that birds are not nesting within the project area. If nesting raptors are detected, a qualified biologist will delineate a suitable buffer.	NPS & GGNPC Project Managers

Prior to implementation of proposed project activities, conduct visual surveys within the Monterey pine and cypress groves on-site to determine the presence or absence of woodrat nests. If woodrat nests are located during this survey, avoid the nest(s) and establish a of 25-50 feet buffer around each nest, depending on the characteristics of the site. Project activities requiring grading, mechanized equipment or vehicles, or large crews within the protective buffer should only occur during the non-breeding season (October-November) to avoid noise impacts to any breeding woodrats that may occupy the nest from December through September. If project activities cannot avoid impacting or removing the nest, then the nest(s) should be dismantled by hand prior to grading or vegetation removal activities. The nest dismantling shall occur during the non-breeding season (October-November) and shall be conducted so that the nest material is removed starting on the side where most impacts will occur and ending on the side where the most habitat will be undisturbed, which will allow for any woodrats in the nest to escape into adjacent undisturbed habitat. If young are encountered during nest dismantling, the dismantling activity should be stopped and the material replaced back on the nest and the nest should be left alone and rechecked in 2-3 weeks to see if the young are out of the nest or capable of being out on their own (as determined by a qualified biologist); once the young can fend for themselves, the nest dismantling can continue.	NPS & GGNPC Project Managers
Prior to implementation of proposed project activities, conduct visual surveys on-site to determine the presence or absence of suitably sized burrows for badgers. If potential badger burrows are located on-site, surveys will be conducted at each burrow to determine the presence or absence of badgers. If badgers are determined to be present, a qualified biologist will be consulted to determine appropriate buffer distances from each occupied burrow to maintain during project activities, and possible project timing restrictions to avoid impacts to birthing individuals (most young are born in March and April ¹ . If avoidance of impacts to occupied burrows is not feasible, then a qualified biologist shall implement a pre-construction program during the non-birthing season (Summer through Winter) to exclude badgers from their burrows by closing each burrow once the badger has emerged.	NPS & GGNPC Project Managers
*Reasonable and Prudent Measure, as specified in the USFWS Biological Opinion, to minimize the impact of the proposed actions on the San Francisco garter snake and the CA red-legged frog: Minimize the effect of incidental take on the San Francisco garter snake and California red-legged frog from construction, restoration, and visitor use activities. To implement this measure, the NPS will: • The GGNRA shall ensure the implementation of their Proposed Conservation Measures (listed previously and as described in great detail in the EA) and the Terms and Conditions of this biological opinion. An education program for field personnel involved with the Mori Point Restoration and Trail Plan shall be conducted prior to initiation of field activities. The program shall consist of a brief presentation by person(s) knowledgeable in the California red-legged frog and San Francisco garter snake. The program shall include the following: a description of these species, their ecology, and habitat needs; an explanation of their legal status and their protection under the Act; and an explanation of the measures being taken to avoid or reduce effects to these species during implementation of the proposed project. The education may be conducted in the field. • To minimize the potential for mortality of San Francisco garter snakes, the areas near wetlands and ponds shall be trapped-out and fenced to the maximum extent possible when heavy equipment is used. Future contracts for San Francisco garter snake surveys, including trapping and biological monitoring, will only be awarded to persons who have a valid 10(a)(1)(A) permit. All	NPS & GGNPC Project Managers

¹ Long 1973 (Long, C. A. 1973. Taxidea taxus. Mammal. Species. No. 26. 4pp.) from "California's Wildlife, Mammals, Badger. California Wildlife Habitat Relationships System, California Department of Fish and Game, 1983."

snake trapping, marking, and holding will be in conformance with the existing permit, as well as additional protective measures described in this opinion. • Unless a head start captive breeding program to enhance juvenile survivorship is in place at a Service-approved facility, all captured San Francisco garter snakes and California red-legged frogs will be released promptly outside of the exclosure areas, unless release would cause the individual to be injured or killed—in which cases the individual will be released as close to the point of capture as possible, but away from the construction area. If a head start program has been established for the San Francisco garter snake, any gravid female snakes will be transported according to the protocol established in conjunction with the program. • Trained personnel will walk the route to and from each restoration area ahead of heavy-equipment and trucks, to be sure that the area is clear of San Francisco garter snakes prior to heavy equipment on site. Staff and volunteers with GGNRA and the GGNPC will be trained on the identification and avoidance of both the San Francisco garter snake and the California red-legged frog. • GGNRA shall work with the Service to plan and initiate a visitor-use survey to assess the effectiveness of the new trail system in reducing off-trail impacts to habitats and implement protective measures as needed. *Reasonable and Prudent Measure, as specified in the USFWS Biological Opinion, to minimize the impact of the proposed actions on the San Francisco garter snake and the CA red-legged frog: Minimize use of herbicides in the vicinity of Sanchez Creek and created wetland habitats. To implement this measure, the NPS will: • No herbicide foliar spraying or direct stump applications will be allowed in riparian or wetland containing the habitat of the San Francisco garter snake or the California red-legged frog except during the dry season. Areas with riparian or wetland vegetation may be treated in the dry season, provided that the groun	NPS & GGNPC Project Managers
*Reasonable and Prudent Measure, as specified in the USFWS Biological Opinion, to minimize the impact of the proposed actions on the San Francisco garter snake and the CA red-legged frog: Protect wetlands at Mori Point and Laguna Salada from disease, pathogens, and exotic species. To implement this measure, the NPS will: The NPS will comply with current sterilization protocols, for all wetland sampling and monitoring at Mori Point, to protect against chytrid and trematode infestation. The NPS will monitor for bullfrogs and warm-water fishes in Sanchez Creek and wetlands at Mori Point. All bullfrog egg masses detected will be removed and the occurrences reported to the Service's Sacramento Field Office	NPS & GGNPC Project Managers
*Reasonable and Prudent Measure, as specified in the USFWS Biological Opinion, to minimize the impact of the proposed actions on the San Francisco garter snake and the CA red-legged frog: Monitor and minimize unlawful activities at Mori Point. To implement this measure: • The NPS will work with the local residents and law enforcement to reduce vandalism, illegal dumping, and camping.	NPS & GGNPC Project Managers

CONCLUSION

Implementation of the Selected Alternative for the Mori Point Restoration and Trail Plan will not have significant impacts on the human environment. The determination is sustained by the analysis in the EA, agency consultations, the inclusion and consideration of public review, and the capability of mitigations to reduce or avoid impacts. Adverse environmental impacts that could occur are negligible to major in intensity, duration, and context and less-than-significant. As described in the EA, there are no highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence. There are no previous, planned, or implemented actions, which in combination with the selected alternative would have significant effects on the human environment. Requirements of the National Environmental Policy Act have been satisfied and preparation of an Environmental Impact Statement is not required. The GGNRA will implement the Selected Alternative as soon as practical.

Recommended:

Brian O'Neill, Superintendent

Golden Gate National Recreation Area, National Park Service

Approved:

Jonathan B. Jarvis, Regional Director
Pacific West Region, National Park Service