



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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May 31, 2024

Elaine Hogan
Executive Director
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**SUBJECT: NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL
IMPACT REPORT FOR THE GREAT REDWOOD TRAIL PROJECT
(SCH# [2024050030](#))**

Dear Elaine Hogan:

On May 1, 2024, the California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) for a Program Environmental Impact Report (PEIR) from the Great Redwood Trail Agency (GRTA; Lead Agency) for the Great Redwood Trail Project (Project). CDFW appreciates the opportunity to provide feedback and understands the Lead Agency will accept comments through May 31, 2024.

As a Trustee Agency pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et seq., see also CEQA Guidelines, Cal. Code Regs., tit. 14 § 15000 et seq.), CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary to sustain their populations (Fish & G. Code, §§ 711.7, subd. (a), 1801 & 1802). CDFW holds these resources in trust by statute for the people of the State of California (Pub. Resources Code, § 21070; Cal. Code Regs., tit. 14, § 15386, subd. (a)) and is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects that have the potential to adversely affect fish and wildlife resources (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW may also assume the role of Responsible Agency (Pub. Resources Code, § 21069 & Cal. Code Regs. Tit. 14 § 15381) in exercising its authority pursuant to the Fish and Game Code sections 1600 et seq. and 2080 et seq. As described in the NOP, implementation of the Project is likely subject to CDFW's lake and streambed alteration authority (Fish and G. Code § 1600 et seq.). CDFW may

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also authorize aspects of the Project that may result in incidental take of species listed as threatened or endangered pursuant to the California Endangered Species Act (CESA; Fish & G. Code § 2050 et seq.).

Project Description

The Great Redwood Trail (GRT) is a 231-mile multi-use trail following the former North Coast Railroad Authority (NCRA) right-of-way through Mendocino, Trinity, and Humboldt counties, California. The trail alignment passes through cities and unincorporated communities, as well as rural and backcountry areas adjacent to the Wild and Scenic Eel River, conservation lands, and privately owned agricultural land, rangeland, and timberland. The trail would connect to the existing Sonoma-Marín Area Rail Transit (SMART) to establish an interregional trail corridor between the San Francisco Bay area and Humboldt Bay. It would be designed and managed to protect and enhance the surrounding natural environment, respect adjacent properties, and offer safe and equitable access for a wide range of users. GRTA prepared a draft Master Plan document, which will be the basis for the proposed project evaluated in the PEIR. As a high-level planning document, the draft Master Plan identifies and prioritizes individual trail segments based on feasibility. The document includes preliminary details on proposed trail use, trail types, design options, and operations and maintenance. Habitat restoration and mitigation are integral to trail development and will be incorporated into design, planning, and permitting wherever feasible.

Biological Significance

The proposed trail alignment includes portions of both the Russian River and Eel River watersheds, traversing diverse terrestrial habitats and providing access to remote wilderness in the Eel River Canyon. The former railroad right-of-way utilizes river canyons, running parallel to and crossing major rivers and their tributaries, many of which provide essential riparian, wetland, and aquatic habitat for fish and wildlife. Given its geographic extent, the Project contains suitable habitat for numerous special status species, including but not limited to coho salmon (*Oncorhynchus kisutch*; FT, ST¹), Chinook salmon (*O. tshawytscha*; FT) summer steelhead (*O. mykiss irideus*; FT, SE), Pacific lamprey (*Entosphenus tridentatus*; SSC), northwestern pond turtle (*Actinemys marmorata*; FPT), foothill

¹ Abbreviations: SE – State listed, endangered; ST – State listed, threatened; FE – federally listed, endangered; FT – federally listed, threatened; FPT – federally proposed, threatened; SSC – CDFW Species of Special Concern; FP – CDFW Fully Protected

yellow-legged frog (*Rana boylei*; SSC), northern spotted owl (*Strix occidentalis caurina*; FT, ST), bald eagle (*Haliaeetus leucocephalus*; SE) golden eagle (*Aquila chrysaetos*; FP), Humboldt marten (*Martes caurina humboldtensis*; FT, SE), and fisher (*Pekania pennanti*; SSC). In addition to streams, wetlands, and riparian corridors, the Project footprint is also likely to include Sensitive Natural Communities (SNCs) and habitat for special status plants.

Comments and Recommendations

CDFW offers the following comments and recommendations on this Project in its role as a Trustee and Responsible Agency pursuant to CEQA (Pub. Resources Code, §21000 et seq.). These comments are intended to minimize Project impacts on public trust resources.

Environmental Permitting

As acknowledged in the draft Master Plan, environmental permitting needs should be evaluated for individual GRT segments to ensure compliance with federal, state, and local laws. As a Responsible Agency, CDFW administers the incidental take provisions of CESA, and Lake or Streambed Alteration activities within the purview of Fish and Game Code section 1600 et seq. Project-related activities that may result in take of CESA-listed species require authorization from CDFW through a Consistency Determination (CD) or Incidental Take Permit (ITP) pursuant to Fish and Game Code sections 2080.1 and 2081, subdivision (b) and California Code of Regulations Title 14 (14 CCR) section 783 et seq. Notification is also required for project activities that may substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel or bank of any river, stream, or lake (Fish & G. Code § 1602). CDFW therefore recommends evaluating each GRT segment to identify project components that may require notification, such as stream crossings, water diversion, and instream habitat restoration. Although many activities would likely be permitted through traditional pathways, GRT segments with a substantial, voluntary restoration component may be eligible for streamlined permitting through CDFW's Cutting the Green Tape program. Please see our [Cutting the Green Tape website](#) or email RestorationPermitting@wildlife.ca.gov for more information. CDFW recommends pre-consultation to discuss project- and site-specific questions.

Scope of Environmental Analysis

The design phase of each trail segment should include a thorough biological assessment of sensitive wildlife, plants, and habitats to adequately disclose direct, indirect, and cumulative impacts, and identify feasible mitigation measures. Site-specific environmental conditions and project scope will determine whether additional focused, species-specific surveys are necessary. For example, trail segments proposing the use, retrofitting, or decommissioning of tunnels, bridges, or other bat habitat should evaluate their potential significance through habitat assessments and appropriately-timed protocol-level surveys. Rare plants and Sensitive Natural Communities should be assessed following the most up-to-date survey protocols, currently CDFW's March 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*. A comprehensive assessment of biological resources should also consider wetlands, riparian areas, and migratory corridors.

Due to its characteristic hillslope instability and steep terrain, the Eel River Canyon represents the greatest physical challenge to trail development. CDFW recommends building upon preliminary reconnaissance and field surveys with geomorphic and geotechnical investigations and analyses to characterize geological risks along the entire alignment. These assessments should inform design alternatives and characterize railway-related physical and hydrological impacts.

CDFW supports the Project's commitment to improve stream crossings and address habitat connectivity and barriers to fish passage. As discussed in the draft Master Plan, the trail alignment includes at least 239 documented stream crossings, many of which are damaged or failed. Although existing hydrological datasets and the California Passage Assessment Database (PAD) are excellent planning and prioritization tools, these datasets are not comprehensive. CDFW recommends evaluating "unassessed," "unknown," and "other" barriers within the PAD and cataloguing unreported barriers along each segment. These surveys will help to identify on-site restoration and mitigation opportunities in addition to those discussed in the Restoration and Habitat Enhancement Technical Memorandum.

Trail Design

The draft Master Plan offers a variety of design solutions for stream crossings, ranging from hardened crossings to culverts, bridges, and full restoration. CDFW

appreciates the Lead Agency's intent to remove culverts wherever feasible but understands that culvert replacement or upgrading may be necessary under some circumstances. Culverted stream crossings should be designed and maintained to accommodate 100-year peak flow and associated sediment and debris while providing for passage of fish and other aquatic organisms. Where possible, crossings should maintain the natural stream substrate with open-bottom or embedded designs, particularly in reaches that support fish and other aquatic organisms. Site access should also be taken into consideration, as some designs (e.g., debris deflectors, emergency overflow culverts) require more routine monitoring and maintenance to prevent failure. This would be particularly true in remote stretches of the Eel River Canyon, where stream restoration or appropriately-sized culverts may be preferable.

Mitigation Measures

Development of the GRT presents a valuable opportunity to address legacy environmental impacts associated with the abandoned railroad. CDFW is supportive of the types of restoration identified in the draft Master Plan and encourages the Lead Agency and local partners to consult early in the design process to identify additional site-specific restoration opportunities with the greatest potential for ecological lift. Fish passage improvements, habitat enhancement, and the removal of railroad debris represent substantial restoration potential along the entire alignment. Failing rail infrastructure and debris are ubiquitous, presenting risks to water quality and instream habitat. CDFW supports the Lead Agency's efforts to identify key opportunities to remove rail-related debris and encourages them to maximize these efforts rather than re-routing the trail to bypass environmental liabilities.

While bank stabilization may be warranted under some circumstances to protect infrastructure or restore disturbed slopes, the use and design should be site-specific to mimic the surrounding area while maintaining hydraulic capacity and geometry. Natural earthflows can serve an essential watershed function, delivering sediment, spawning gravel, boulders, and large wood to rivers and streams. Although slope instability caused or exacerbated by the railroad prism should be addressed to the extent feasible, natural landsliding processes should be anticipated.

Alternatives

The Eel River Canyon presents a significant challenge to future trail development due to a combination of factors, including its erosive geology, failing rail

infrastructure, limited access, and environmental constraints. Any converted trail alignment utilizing the former railroad prism will be subject to the same hillslope instability that undermined the railroad. Rather than attempting to control geomorphic processes through bank stabilization, trail design through this reach should account for ongoing earthflow and debris slides over the life of the Project, anticipating the need for trail reconstruction and routine maintenance. It may be preferable to bypass the most unstable areas with a parallel route through adjacent public lands, as discussed for a stretch of the Eel River Canyon Preserve and Emerald Waters Reserve segment.

Similarly, CDFW appreciates the Lead Agency's forethought in proposing alternative alignments for the Island Mountain tunnel, which poses potential safety and environmental concerns. Anecdotal evidence suggests the tunnel hosts a substantial bat colony. Any future retrofitting and use of that feature or any other potential maternity or roost site should be predicated on thorough, targeted surveys to determine bat presence and potential impacts. CDFW offers its technical expertise in evaluating the biological significance of these features, the unique nature of which may be difficult to recreate. Where mitigation is infeasible, it may be preferable to select an alternate route that bypasses tunnels or other occupied infrastructure, as proposed for the Island Mountain tunnel. A safe closure to prevent human access should allow for continued use by bats and other wildlife.

Submittal of Biological Data to CNDDDB

CEQA requires that information developed in Environmental Impact Reports and Negative Declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code § 21003(e)). Accordingly, please report any special status species and Sensitive Natural Communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Additional information and instructions for data submission can be found on the [CNDDDB website](#).

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Thank you for the opportunity to comment on this NOP. CDFW staff are happy to consult with the GRTA and provide technical expertise. Please contact [Kathryn Rian](#), Environmental Scientist, with any questions or comments.

Sincerely,

Rebecca Garwood

Rebecca Garwood
Environmental Program Manager
Coastal Habitat Conservation - Northern Region

cc: State Clearinghouse, Office of Planning and Research
State.Clearinghouse@opr.ca.gov

Rebecca Garwood, Michael van Hattem, Angela Liebenberg, Kathryn Rian, Adam Hutchins, Jennifer Garrison
California Department of Fish and Wildlife