FINAL ENVIRONMENTAL IMPACT REPORT

Redwood Cabin Removal Project



Prepared for

Midpeninsula Regional Open Space District
5050 El Camino Real
Los Altos, CA 94022

October 21, 2022

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October 21, 2022

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LIST OF ABBREVIATIONS

Board	Board of Directors
CEQA	California Environmental Quality Act
CRHR	California Register of Historical Resources
Draft EIR	draft environmental impact report
Final EIR	final environmental impact report
GHG	greenhouse gas
HABS	Historic American Building Survey
Midpen	Midpeninsula Regional Open Space District
Preserve	La Honda Creek Open Space Preserve
project	Redwood Cabin Removal Project

1 INTRODUCTION

This final environmental impact report (Final EIR) has been prepared by Midpeninsula Regional Open Space District (Midpen), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (CCR Section 15132). This Final EIR contains responses to comments received on the draft environmental impact report (Draft EIR) for the Redwood Cabin Removal Project (project). The Final EIR consists of the Draft EIR and this document (response to comments document), which includes comments on the Draft EIR and responses to those comments.

1.1 PURPOSE AND INTENDED USES OF THIS FINAL EIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the project, and to provide the public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document. The Final EIR will be used to inform Midpen's decision regarding whether to approve or disapprove the Redwood Cabin Removal Project.

This Final EIR will also be used by CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the project or that have jurisdiction over portions of the project.

Responsible, trustee, and interested agencies may include:

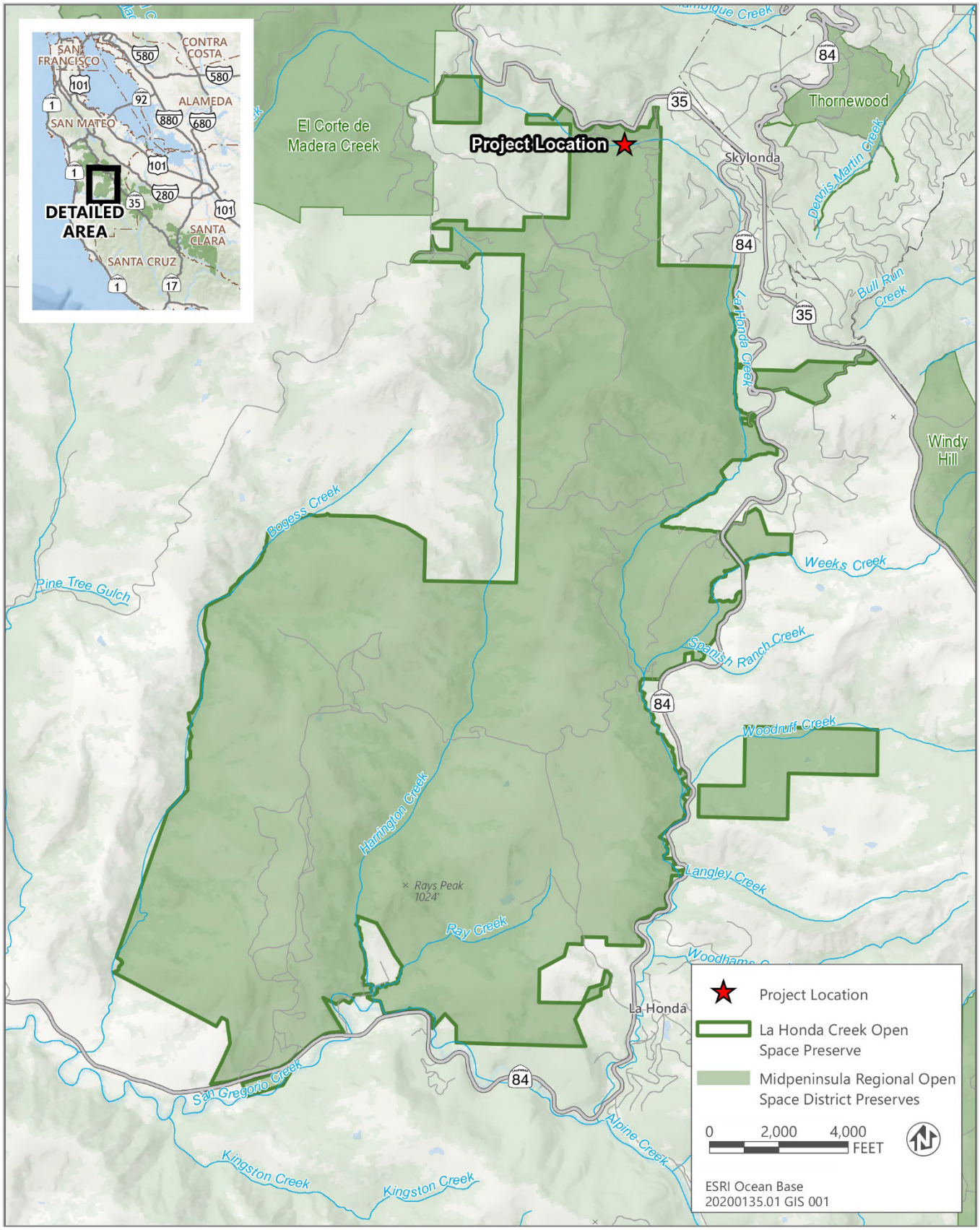
- State Water Resources Control Board / San Francisco Bay Regional Water Quality Control Board
- County of San Mateo
- Bay Area Air Quality Management District

1.2 PROJECT LOCATION

The Redwood Cabin is situated within the upper portion of the La Honda Creek Open Space Preserve (Preserve). The Preserve encompasses 6,142 acres in the Santa Cruz Mountains within unincorporated San Mateo County, approximately 5 miles east of the Pacific Ocean (see Figure 1-1). The Preserve is bounded by Highway 35 (Skyline Boulevard) to the north, by Highway 84 (La Honda Road) to the east and south, and by Bogess Creek to the west.

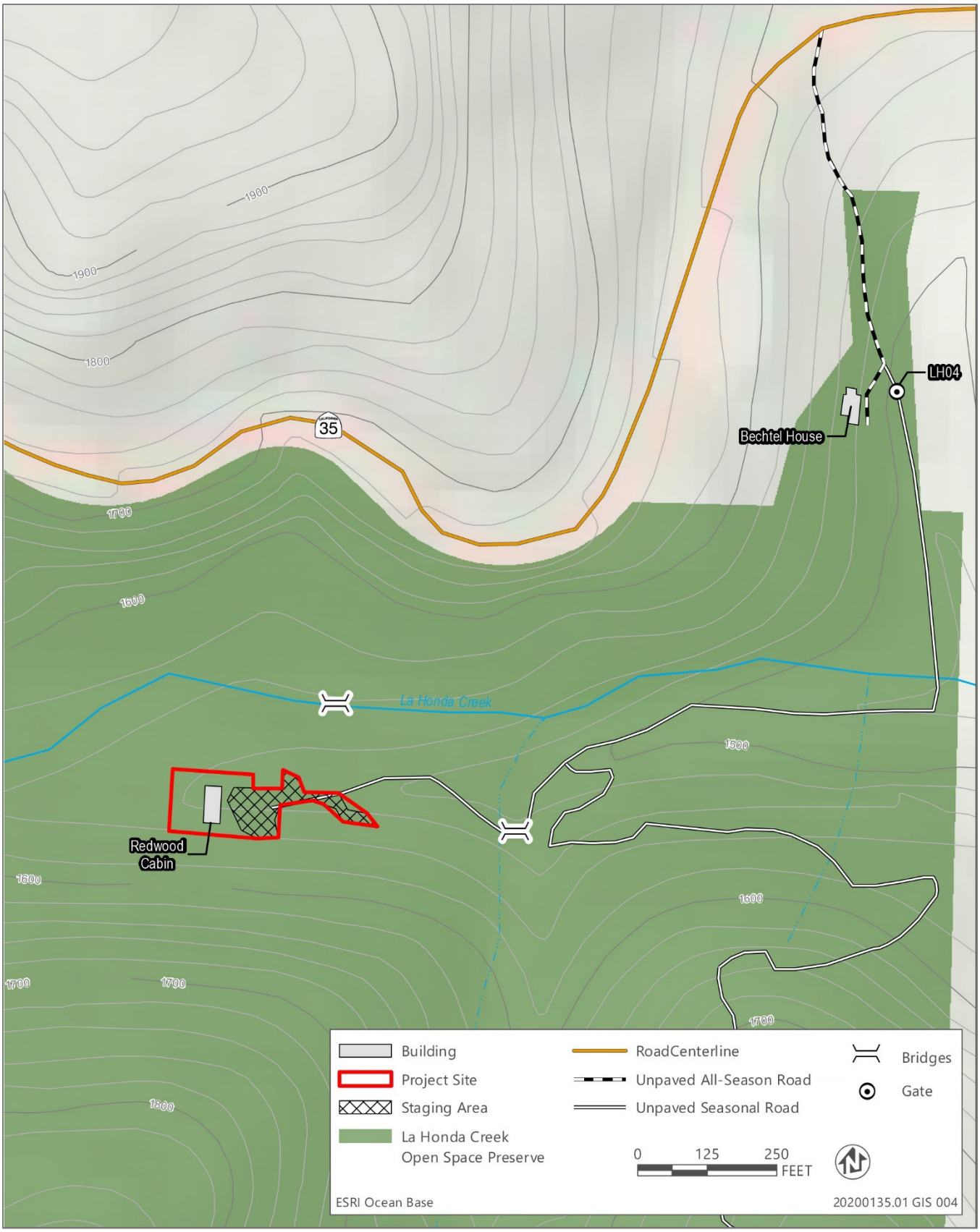
The Redwood Cabin occupies a portion of Assessor's Parcel Number 075-330-260 and is located west of the community of Skylonda, California. The project site is designated for Forest/Timber Production land uses under the San Mateo County General Plan and is zoned as Timber Land Preserve District under the San Mateo County Zoning Ordinance. Access to the Redwood Cabin is provided via an unpaved road accessible from Skyline Boulevard, which travels through two locked gates; the area surrounding the Redwood Cabin is closed to public access. The final segment of this unpaved road requires a four-wheel drive vehicle or access by foot (see Figure 1-2); access roads leading to the Redwood Cabin are not open to public use.

The project site is located in a wooded area within the northernmost portion of the Preserve that is currently not open to the public. The building is situated atop sloped terrain overlooking a circular dirt driveway that surrounds a small grove of redwood trees.



Source: Data received from Midpeninsula Regional Open Space District in 2020

Figure 1-1 Project Vicinity and Location



Source: Data received from Midpeninsula Regional Open Space District in 2021

Figure 1-2 Project Site

1.3 PROJECT OBJECTIVES

The proposed project is intended to achieve the following primary objectives, in alignment with Midpen's mission:

- Remove physical hazards to ensure public safety,
- Enhance habitat and natural ecological function at the Redwood Cabin site and immediate surroundings,
- Reduce structure and wildland fire risk by removing a structure with a history of vandalism,
- Improve natural visual character and scenic open space qualities at the site, and
- Implement a fiscally sustainable project consistent with Midpen's mission as an open space district.

1.4 SUMMARY DESCRIPTION OF THE PROJECT

The project would entail demolition of the Redwood Cabin and removal of associated features onsite, including the stone retaining walls and barbeque and fire pits. Prior to demolition activities, lead-based paint present within the structure would be properly removed and disposed of.

While it is expected that excavation of posts and bases associated with the structure would be approximately 2 feet below grade, it is possible that maximum depth of excavation could reach up to 5 feet. During demolition of the structure, it is estimated that approximately 60 tons of material would be removed from the project site (ZFA 2020). Tree removal will not be required to facilitate demolition activities, although some brush clearing along the access road may be necessary.

Following completion of demolition activities, disturbed areas would be recontoured and erosion control applied to the site to ensure adequate site drainage. All demolition and recontoured areas would be compacted to 75 percent relative compaction. Native grass seed mix would be spread in the disturbed areas and weed free or native grass straw would be placed in the disturbed areas, on top of the native grass seed mix, to assist with soil stabilization and erosion control. Any wood chips or mulch generated from unsalvageable building materials may also be used to stabilize disturbed areas but will not be more than 3 inches in depth. Midpen may also conduct the following activities on the project site after demolition and recontouring:

- soil decompaction activities outside of critical rootzones,
- soil testing and, if needed, spot application of amendments such as fertilizers, lime, or organic materials, and
- revegetation or plantings.

Midpen also conducts early detection rapid response surveys for up to 3 years at revegetation sites and treats any invasive plant species on the early detection rapid response list. Other priority integrated pest management target species, including slender false brome may be treated before and after construction. Slender false brome is an invasive weed of high concern at the project site; due to Midpen's mandatory quarantine of this weed, all slender false brome in the area will be treated before any work being completed.

Current activity at the project site consists of occasional visits from Midpen staff for inspections. Once removal of the structure and site recontouring/erosion control activities are complete, no additional maintenance or operational activities would be required at the project site except for invasive plant species treatment, if needed. The site would remain closed to the public.

1.5 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft EIR identified the following significant impacts related to the project. Potentially significant impacts, which implementation of feasible mitigation measures would reduce to a less-than-significant level, were identified for biological resources (special-status species and associated habitats) and archaeological resources.

Significant impacts were identified for cultural resources for which further mitigation is not available and the impact remains significant and unavoidable. Specifically, the proposed project would result in demolition of a structure that has been recommended eligible for listing in the California Register of Historical Resources. Although mitigation measures require documentation of the building before removal, because the building would be lost, the impact is considered significant and no additional feasible mitigation measures are available. This is also considered a significant contribution to a cumulative impact.

See Section 3.1, "Cultural Resources" and Section 3.2, "Biological Resources" of the Draft EIR for a more detailed summary of the impact conclusions and mitigation measures identified.

1.6 CEQA PUBLIC REVIEW PROCESS

On April 14, 2022, Midpen released the Draft EIR for a 45-day public review and comment period. The Draft EIR was submitted to the State Clearinghouse for distribution to reviewing agencies; posted on Midpen's website (https://www.openspace.org/who-we-are/public-notices); and was made available at Midpen's Administrative Office and the Woodside Library. A notice of availability of the Draft EIR was published in the Half Moon Bay Review and the Bay Area News Group.

A public hearing was held on April 27, 2022, to receive input from agencies and the public on the Draft EIR. The hearing was held during Midpen's regularly scheduled Board of Director's (Board) meeting at 7:00 p.m. The hearing was recorded and is available at https://www.openspace.org/about-us/meetings/bod-20220427.

As a result of these notification efforts, written and verbal comments were received from individuals and members of the Board on the content of the Draft EIR. Chapter 2, "Responses to Comments," identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute "significant new information" by CEQA standards (State CEQA Guidelines CCR Section 15088.5).

1.7 ORGANIZATION OF THE FINAL EIR

This Final EIR is organized as follows:

Chapter 1, "Introduction," describes the purpose of the Final EIR, summarizes the Redwood Cabin Removal Project and the major conclusions of the Draft EIR, provides an overview of the CEQA public review process, and describes the content of the Final EIR.

Chapter 2, "Responses to Comments," contains a list of all parties who submitted comments on the Draft EIR during the public review period, copies of the comment letters received, and responses to the comments, including those received during the public hearing.

Chapter 3, "Revisions to the Draft EIR," presents minor revisions to the Draft EIR text made to correct typographical errors. Changes in the text are signified by ~~strikeouts~~ where text is removed and by <u>underline</u> where text is added.

Chapter 4, "References," identifies the documents used as sources for the analysis.

Chapter 5, "List of Preparers," identifies the lead agency contacts as well as the preparers of this Final EIR.

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2 RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Draft EIR, which concluded on 5/31/2022, including comments received during the 4/27/2022 Board of Directors public hearing. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

2.1 LIST OF COMMENTERS ON THE DRAFT EIR

Table 3-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

Table 3-1 List of Commenters

Letter No.	Commenter	Date
INDIVIDUALS		
I1	John and Shannon Harney	April 18, 2022
I2	Sheila Brady	April 26, 2022
I3	Maureen O'Connor	May 18, 2022
I4	Laura Jones	May 30, 2022
I5	Shani Kleinhaus	May 31, 2022
PUBLIC HEARING ON THE DRAFT EIR (4/27/2022)		
PH1	Board Member 1	—
PH2	Board Member 2	—
PH3	Board Member 3	—

2.2 COMMENTS AND RESPONSES

The verbal and written individual comments received on the Draft EIR and the responses to those comments are provided below. The comment letters and verbal comments made at the public hearing are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter. Written comments are also provided in Appendix A.

2.2.1 Individuals

Letter I1 John and Shannon Harney

April 18, 2022

Comment I1-1

We are opposed to the cabin removal APN:075-330-260. There are only a handful of these cabins left. The owners new what they had. They need to put money into it like the other owners of other historic cabins in Skylonda have. Thanks.

Response I1-1

The comment expresses opposition to the removal of the Redwood Cabin and advocates for the investment of historic cabins; the comment does not address the adequacy of the Draft EIR analysis.

Midpen completed an assessment of various alternatives for the Redwood Cabin with estimated costs, which was presented to the Board of Directors in April 2020. After considering the remote nature of the site, the public safety and fire risk concerns, as well as costs for the various alternatives, the Board of Directors directed the General Manager to evaluate the environmental effects that would result from removing the Redwood Cabin. The Draft EIR includes an evaluation of the potential impact of the project on historic resources (see Impact 3.2-3 in Section 3.2, "Cultural Resources") and concludes that the impact is significant and unavoidable. The comment is included in the record.

Letter I2 Sheila Brady

April 26, 2022

Comment I2-1

When I heard about the "Reimagining of Big Basin" project, I forwarded the Page & Turnbull, Inc. Historic Resource Evaluation to assess the Redwood Cabin's eligibility for listing in the California Register of Historical Resources (CRHR). I received a note back from the Reimagining Big Basin Team describing the idea of re-locating the cabin to Big Basin as an intriguing suggestion. You can see the notes regarding this in the appendix at the bottom of this email.

I do not know if further evaluation of that possibility was ever completed. I have copied both the Reimagine Big Basin team and the Midpen team on this note. It would be great if there was an assessment of whether it could make any sense to relocate the Log Cabin to Big Basin thus in one move, save a historic cabin, and replace some of the wonderful historic architecture that we lost in the Big Basin fire.

I realize that there would probably need to be an initial assessment of deconstructing, moving, and reconstructing the cabin in Big Basin and I'd be willing to spearhead fundraising to get that assessment done.

I think that the fact that it is within current memory that rustic houses like the Old Redwood Cabin were heavily in use is important to realize and remember. We take so much for granted about the ease of our existence. It is good to share the tactile memories that a house like this one elicits with our children. And the history of the hard work and courage that it took to build on this land is also an important memory to cherish and respect. There is something about looking at the axe strokes on the end of a log, one of many that make up a building, which says much more than words about how tough it is to survive on the land. Just as a lot of the excellent discussion in the Reimagining Big Basin project centered around the importance of integrating the Native American experience of caring for the land and recognition of the intelligent land and wildlife management used by the native tribes, I think that replacing the old Big Basin cabins which were destroyed in the fire with another cabin of the same age will help us to tie ourselves to that history and recognition of that age.

Response I2-1

The comment proposes that the Redwood Cabin be moved to Big Basin Redwoods State Park as part of the "Reimagining of Big Basin" project; the comment does not address the adequacy of the Draft EIR analysis. Midpen staff recently spoke with staff from California State Parks (State Parks) to discuss if their agency would have interest in relocating the cabin to Big Basin Redwoods State Park. While they appreciated the idea, State Parks affirmed that they are not interested in relocating the cabin to Big Basin. State Parks staff stated that they are currently undergoing a planning process to reimagine Big Basin following the 2020 CZU lightning complex fire and that relocation of the cabin to Big Basin Redwoods State Park would be inconsistent with Reimagining Big Basin project's guiding principles established through the visioning process, particularly related to the desired location of new buildings and goals around the future resiliency of new buildings. Given the fire risk in the region, and the devastating fire loss experienced in the CZU Fire, new structures at Big Basin Redwoods State Park are now planned to be fire resistant to minimize loss in the event of future fire.

The Draft EIR's alternatives analysis (Chapter 4) identifies a "Relocate and Stabilize" alternative that would involve relocation of the structure either within La Honda Creek Open Space Preserve or to a site not owned by Midpen. As discussed on page 4-3 of the Draft EIR, in order to retain the structure's historic integrity and therefore its eligibility for listing in the CRHR, the new site would have to be in a forested setting, similar to the current location. The "Relocate and Stabilize" alternative was considered but dismissed from further evaluation because it contradicts one

project objective and fails to meet a second objective. Relocating the structure to another forested setting contradicts Objective 2, enhance habitat at the Redwood Cabin site and immediate surroundings, because preparing a new building site for the Redwood Cabin would likely disturb and impact new areas of undisturbed, natural forested habitat. This could result in significant impacts to biological resources. Objective 6, implement a fiscally sustainable project, would not be met because relocating the cabin would significantly increase costs to disassemble, move, prepare new site and reconstruct the building, which would then require additional stabilization improvements to ensure public safety. Thus, this alternative would not achieve a fiscally sustainable project (see page 4-3 of the Draft EIR). The comment is included in the record.

Comment I2-2

I also note that it seems that a paragraph is missing in the notice:
https://www.openspace.org/sites/default/files/Notice%20of%20Availability_Draft%20EIR%20for%20Redwood%20Cabin%20Removal%20Project.pdf

In paragraph 2 of the section titled "Purpose and Objectives" the cabin is described as:

"The Redwood Cabin appears to be one of few remaining examples of a permanent recreational cabin in the Santa Cruz Mountains from the 1920s with a high degree of historic integrity— historic integrity refers to a building's original character and materials, not the physical condition of the building—and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1). It is also a unique example of a rustic recreational cabin in the surrounding area (CRHR Criterion 3)."

This is immediately followed by a paragraph that describes how the cabin was going to be demolished. Isn't there something missing there?

A paragraph like, "Unfortunately, in spite of the uniqueness of this cabin as described above, the Midpen Board of Directors has done an evaluation which shows that there is no budget set aside to repair it for use, there is no access to the area, there is no intention in Midpen's plans that there will ever be access to the area, and as the uniqueness of the cabin and its surrounds is a magnet for vandals there is a fear that a fire could be started there where there is no budget for regular patrols. So Midpen's Board of Directors have determined that, in spite of its historic significance, the cabin's removal and complete destruction is the best thing for the community."

I apologize if my rewording of the primary objectives of the project doesn't correctly capture the goals.

My Dad was a City Planner for the City of Berkeley for many years. I fully understand that compromise is the only way that we can live together and have a civilized society. I realize that with minimal budget Midpen has done and continues to do a great job of protecting the lands and the wildlife of the Midpen districts. I am very grateful for the efforts and the quality of the fine Midpen rangers I have dealt with over the 27 years I have lived up in Skylonda. The reason that vandals hang out in that cabin or around it, is because it is an intriguing and beautiful piece of our local history and it is a magical spot. The fire danger is serious and I fully appreciate Midpen's efforts to protect my community from fire danger, but if the cabin were moved to a place where it would be welcome, and looked after, maybe it would still be able to cast it's magic spell there?

Thanks very much for giving me the opportunity to comment.

Response I2-2

The comment does not address the adequacy of the Draft EIR analysis, but suggests that text is missing from the Notice of Availability to explain the considerations taken into account for the potential demolition of a historic structure. The purpose of a Notice of Availability is to announce that a Draft EIR is available for public review and is not meant to include all information related to project evaluation and decisions. Though this exact information is not included in the Notice of Availability, the details are provided in Chapter 2, "Project Description," of the Draft EIR, on pages 2-1 and 2-4. Although the Notice of Availability does not contain the suggested text, it does state that there is no public access to the site (page 3), and that it poses a site safety hazard and has been the site of numerous trespassing and vandalism incidents, including fire ignitions (page 2).

Prior to directing the General Manager to prepare an analysis of the environmental effects of removing the Redwood Cabin, the Midpen Board of Directors examined various options for the Redwood Cabin. After considering the remote nature of the site, the public safety and fire risk concerns, as well as costs for the various alternatives, the Board of Directors then directed the General Manager to evaluate the environmental effects of the proposed project per CEQA. The comment is included in the record.

Letter I3 Maureen O'Connor

May 18, 2022

Comment I3-1

I was at the HRAB meeting today and appreciated your input on the above referenced project. I went to the EIR report. It is quite extensive.

I could not find 3.2-1A nor could I find any reference to HAPS or HABS using the search option. I hope you can help me with this.

Response I3-1

The comment requests assistance with locating information in the Draft EIR; Midpen has replied to this comment via email. Mitigation Measure 3.2-1a, which outlines the requirements for the Historic American Building Survey (HABS), can be found on page 3.2-15 of the Draft EIR.

Comment I3-2

Also I have a public comment/suggestion:

The EIR contains some photos of the cabin as it is now. Perhaps Midpen has some additional photos of it now and also in its early historic period. These could be put into a document to preserve its history in hard copy since it will be torn down. This document could be given to the Peninsula Library System and to the local historical museum/association for future reference. The document could include the EIR also since it describes the care that Midpen took in making the decision to tear it down.

If there is any distinctive hardware still on the property, that could be saved and donated to an historical museum in the area near it's former location along with a copy of the document I mentioned earlier.

Response I3-2

The comment suggests steps for preservation documentation. As described on page 3.2-15 of the Draft EIR, Mitigation 3.2-1a, Document historic buildings prior to removal, includes the compilation of written history, plans and drawings, and photographs to be submitted to the San Mateo County Library, the San Mateo County Historical Association, the Northwest Information Center, and the Midpen office. Mitigation 3.2-1b, Redwood Cabin interpretation, would require an interpretive resource document outlining the Redwood Cabin's historic status, historic context, and significance. This would include historic photographs, as suggested by the commenter. Additionally, Mitigation Measure 3.2-1c, Salvage of useable materials, states that if any of the demolished structure materials are found to be in acceptable condition (i.e., no lead paint, minimal dry rot), Midpen shall reserve materials for potential future uses and/or salvage. Therefore, the commenter's recommendations are, in general, already required as part of the mitigation measures identified in the Draft EIR.

Letter I4 Laura Jones

May 30, 2022

Comment I4-1

I am writing as a friend and neighbor of the District, and as a professional archaeologist and historic preservation advocate. I am disappointed by the proposal to demolish the cabin, and by the flimsy analysis presented to justify this action in the DEIR. Although there is insufficient information to support a robust decision-making process in the DEIR, it is clear that the minimum the District should do is to stabilize the hundred-year-old historic log cabin, identified in the DEIR as the "Environmentally Superior Alternative."

Response I4-1
The commenter believes that even though the Draft EIR contains insufficient information with which to make a decision, Midpen should select the Environmentally Superior Alternative. The commenter does not identify which information is believed to be missing or what additional information is believed to be necessary in the Draft EIR. The Draft EIR and Final EIR provide findings of the environmental analysis for the proposed project as well as information on a variety of project alternatives, including the Environmentally Superior Alternative (see Draft EIR Chapter 4, "Alternatives," page 4-6 for a detailed discussion of the Environmentally Superior Alternative).

Comment I4-2
The 2014 Vision Plan clearly identified cultural resources as scenic resources, and as assets that merit preservation. The Vision Plan includes goals such as

"Protect immediately at-risk, culturally significant resources and promote their responsible stewardship."

"Maintain a sense of place by protecting and increasing access to locally significant, iconic natural or cultural features."

The Draft EIR for the Redwood Cabin Removal Project ignores these goals, which are not included as "project objectives." Instead, the "project objectives" were carefully engineered to disregard these goals. Two of the objectives are essentially identical: remove physical hazards and reduce structure and wildfire risk.

Response I4-2
The comment states that the project objectives ignore the objectives of the 2014 Vision Plan. The 2014 Vision Plan is a long-range overarching plan for all the preserves in Midpen's jurisdiction. As stated on the title page of the Vision Plan, "The mission of the Midpeninsula Regional Open Space District is to acquire and preserve a regional greenbelt of open space land in perpetuity, protect and restore the natural environment, and provide opportunities for ecologically sensitive public enjoyment and education." On the coast, Midpen has an expanded mission to acquire and preserve agricultural land of regional significance, preserve rural character and encourage viable agricultural uses of land resources. Because the Redwood Cabin poses a safety hazard and has been the site of numerous trespassing and vandalism incidents (including fire ignitions), the project objectives are designed to implement other goals stated in the 2014 Vision Plan, including: "Reduce or eliminate safety hazards and promote safe use of the preserves" and "Restore the natural environment, control invasive plants and animals, and limit the spread of pathogens." In this case, the public safety risk and potential risk of wildfire ignition (which could be detrimental to the surrounding natural resources and property and community at large) are of greater concern, outweighing the goals for preserving the cultural resource. The comment is included in the record.

Comment I4-3
The analysis in the Draft EIR is internally contradictory on the objective improve scenic qualities. For example, the cabin is identified as having no scenic value because it cannot currently be seen by the public, but removing it is assumed to improve scenic open space qualities. If the site has no scenic value because no one sees it, and public visual access is not a component of the project, then how can scenic value change as a result of the project? The conclusion that demolishing the historic cabin meets the objective of "improving scenic open space qualities" is not supported.

Response I4-3
It appears the commenter is referencing the project objective related to improving the *natural* visual character and scenic *open space* qualities at the site (*emphasis* added). The objective is not focused on preserving the existing *built* visual character but on improving the site's scenic character from a *natural and open space* perspective—regardless of the viewer. This differs from the question identified in the Aesthetics section of the Initial Study (included as Appendix B of the Draft EIR) that relates to visual character or quality of the views as seen by the public of the site and its surroundings. (The Initial Study defines "public views" as those that are experienced from publicly accessible vantage points.) Therefore, there is no contradiction, just a different focus.

Comment I4-4

A second example of contradictory and unsupported findings occurs in the brief discussion of the "No Project Alternative" where the DEIR finds that "therefore, no impact to biological resources would occur," but also that "the No Project Alternative would result in Slightly Greater Impact to biological resources than the proposed project." This "slightly greater" impact is due to the lost opportunity to "restore" the site's natural character. There is no actual analysis of the relative biological benefits of stabilizing the cabin in place, or relocating it, in contrast to the minimal restoration activities described in the project description.

Response I4-4

The commenter summarizes the EIR's discussion related to the project and the No Project Alternative's impact to biological resources. The commenter then indicates that there is no actual analysis regarding "relative biological benefits" associated with stabilizing or relocating the cabin "in contrast to" the restoration activities described in the EIR's project description. It is unclear how the commenter's discussion of the No Project Alternative relates to the issue raised with the Stabilize Alternative and the Relocation Alternative that was not identified for further evaluation in the Draft EIR. As described in the Draft EIR on page 4-5, the Stabilize Alternative would be expected to result in a slightly greater impact to biological resources compared to the project (similar to the No Project Alternative) due, in part, to the lost opportunity in removing a built structure that is located within forested habitat, restoring the building footprint with native seed, as well as allowing for natural reforestation processes (i.e., natural emergence of native forest vegetation and tree saplings). As such, the Stabilize Alternative would not provide the long-term opportunity to improve biological resources that the proposed project does. It should be noted that the alternative envisioning relocation of the cabin was rejected early in the environmental review from further consideration due to the alternative's inability to meet project objectives (see Draft EIR page 4-3); therefore, a comparison of the environmental impacts to the project was not provided.

Comment I4-5

The exclusion of the Relocation alternative is also unsupported. The assumption that the site for reinstallation must be "undisturbed" and therefore would involve significant impacts is not supported by substantial evidence. One can easily imagine a partially disturbed site in an appropriate setting for the cabin: a parking area next to a trailhead, for example. The DEIR's conclusion is unsupported.

Response I4-5

The comment expresses the opinion that the exclusion of the Relocate and Stabilize Alternative is unsupported. As stated on page 4-3 of the Draft EIR, "In order to retain the structure's historic integrity and therefore its eligibility for listing in the [California Register of Historical Resources] CRHR, the site would have to be in a similar setting to the current location." A property must have both significance and integrity to be considered eligible for listing in the CRHR. Loss of integrity, if sufficiently great, can severely diminish the historical significance of a resource and render it ineligible. The seven factors of integrity can be roughly grouped into three types of integrity considerations. Location and setting relate to the relationship between the property and its environment. Design, materials, and workmanship, as they apply to historic buildings, relate to construction methods and architectural details. Feeling and association are the least objective of the seven factors and pertain to the overall ability of the property to convey a sense of the historical time and place in which it was constructed. The Historic Resource Evaluation prepared by Page & Turnbull 2020 (see Appendix D of the Draft EIR) defines the integrity of the Redwood Cabin as follows:

> *Location*
> The La Honda Creek Redwood Cabin retains integrity of location as it has remained in its original location since construction.
>
> *Setting*
> The La Honda Creek Redwood Cabin retains integrity of setting. The cabin remains in a rural setting, set within a heavily forested area. The immediate area remains remarkably undeveloped, even with a more heavily trafficked Skyline Boulevard nearby. The cabin retains its subtle landscaping features including the stone walls and circular dirt driveway. It is also still accessed by a semi-rural dirt road. The general area also retains similar use, functioning as a day-use recreational area and year-round home.

Design
The La Honda Creek Redwood Cabin retains integrity of design. It does not appear to have any major design alterations or additions. The building retains its large, rectangular footprint, rustic log construction, doors and casement windows, stone and wood staircase, stone site features, side-gable roof, and log fascia. The aluminum skylights are likely alterations; however, the original design remains legible. The wraparound porch appears predominantly intact, although the rear porch projection is no longer standing, and the building is still able to convey its rustic style.

Materials
The La Honda Creek Redwood Cabin retains integrity of materials. It does not appear to have any major alterations and many original elements remain, including the barked redwood logs, plank decking, rustic deck posts and railing, stone staircase and site elements, stone chimney, wood doors and windows. The wraparound porch is mostly intact, except for the northern porch and northwest projecting deck. The porch at the primary façade remains intact, as does the entry staircase. Most material components appear to remain from the building's initial construction.

Workmanship
The La Honda Creek Redwood Cabin retains integrity of workmanship. The building remains representative of workmanship common to rural recreation cabins constructed in the early twentieth century. The construction and design of the cabin reflect the workmanship of a local builder, such as the rustic log construction, saddle notches, vertically set log posts, and stone chimney. The building's retention of such features is evidence of remaining workmanship.

Feeling
The La Honda Creek Redwood Cabin retains integrity of feeling as a recreational cabin constructed in a rural setting in the 1920s, during the rise of the automobile era and recreation boom in the country. The subject building continues to express its historic aesthetic character, as evidenced by its retention of a rural setting away from development and within a heavily forested area, and its historic materials and rustic workmanship associated with its era of construction.

Association
The La Honda Creek Redwood Cabin retains integrity of association. Originally constructed as a recreational cabin for W. B. Allen and his family in the 1920s, the cabin no longer operates as such and is currently vacant. While the cabin no longer serves as a retreat for the Allen family, it does remain in a recreational setting. Acquired by the Midpeninsula Regional Open Space District, the property continues to be surrounded by a recreational area and away from any development. The property continues to communicate its rural setting. Overall, the cabin retains sufficient enough integrity of association.

If the Redwood Cabin were to be relocated to a partially or fully disturbed site, such as a developed residential parcel or other unvegetated site, it would lose integrity of location, setting, feeling, and would also likely lose integrity of association. Under this scenario, the building would no longer retain its overall integrity and would no longer be eligible for listing in the CRHR. The Relocate and Stabilize alternative would also not meet project Objective 6, implement a fiscally sustainable project, because relocating the cabin would significantly increase costs to disassemble, move, prepare the new site, and then reconstruct and stabilize the building. For all of these reasons, the Relocate and Stabilize Alternative was eliminated from further evaluation in the Draft EIR.

Comment I4-6
The assessment of biological impacts is also circular in its logic – the report finds that there are no special status botanical species on the site, but then suggests that the project will result in an increase in habitat for such species because of mitigation measures that are not required because there are no special-status species (p. 3.1-8). This circular logic pervades the report.

The DEIR relies upon minimal restoration activities – erosion control covering 0.7 acres of land within a 6,142 acre preserve --- to support a finding of "enhanced ecological function." There is no analysis of whether these activities

will enhance ecological function. Unirrigated grass seed covered with straw and mulch have little likelihood for success – and the fire danger associated with this treatment is also unanalyzed. The biological benefits of this minimal erosion control treatment are trivial, although little basis is giving for any findings in this regard. There is no substantial basis for finding that the proposed project meets the objective of enhancing "habitat and natural ecological function."

Response I4-6

It is not contradictory to conclude that no special status plant species currently occur on a site and simultaneously indicate that a project, which includes ecological enhancement activities, could enhance habitat for such species to create improved biological conditions that promote special status species migration to the site. The "mitigation measures" identified by the commenter are actually not mitigation measures but instead components of the project and fulfill existing requirements from other Midpen plans. Also, it is unclear what the commenter means by the Draft EIR's reliance on described restoration activities to "support a finding" regarding enhanced ecological function. CEQA does not require such a finding. Chapter 2, "Project Description," of the Draft EIR includes a detailed description of the proposed site recontouring and revegetation (page 2-8) and also includes a detailed description of the various environmental protection measures that the project would be implemented. The project is designed to meet the objective related to enhancing habitat and natural ecological function. The potential for wildfire-related impacts is discussed in the Initial Study, included as Appendix B of the Draft EIR. The Initial Study concludes that the project would result in less-than-significant impacts related to wildfire. It should also be noted that, overall, the project would eliminate a potential wildfire ignition risk associated with trespassing at the existing structure where prior trespassing occurrences have included the illegal setting of fire within the structure.

Comment I4-7

The analysis of potential impacts to cultural resources is inadequate for archaeological resources. A hundred-year-old remote log cabin site will have buried features, and Native American sites and belongings may be present whether or not the site was disturbed by construction of the cabin. A Record Search is not a substitute for a site inspection and testing by a qualified professional archaeologist. There is no evidence that any archaeologist ever visited the site. This is not an adequate level of effort for identification of potential resources.

It is also not a best practice to have the construction contractor be responsible for identifying cultural resources during construction and ONLY THEN implementing cultural resource protocols. If MPROSD is going to disregard archaeological site preservation as a goal, at least a minimal program of full-time construction monitoring of all earth disturbing activities by a qualified professional should be required.

Response I4-7

The comment states that the analysis of potential impacts to archaeological resources is inadequate. Although an archaeological survey was not conducted for the project, a cultural resources management professional did visit the site and noted that ground visibility was less than five percent due to the accumulation of redwood duff; thus, a standard archeological pedestrian survey would not have produced much additional information. Also, the project includes minimal ground disturbance and none beyond what has previously been disturbed. Because the only ground to be disturbed is related to removing the wooden posts that support the Redwood Cabin and the accessory features (retaining wall, barbeque, and fire pit which have been thoroughly documented) a survey would not have revealed archaeological material under these structures. The protection measures included in the Draft EIR are standard for this level of demolition. EPG CUL-1, Protocol for Unexpected Discovery of Archaeological and Paleontological Cultural Materials, which calls for discovery protocol such as stopping work within 30 feet of the discovery, notifying a qualified professional, and implementing methods to protect the find (e.g., fencing) until the significance of the find is determined and a treatment plan can be identified and implemented, is detailed on page 3.2-5 of the Draft EIR. Regarding testing, standard practice is to conduct shovel test pits only when there is a known archaeological site (which is not the case for this project as detailed in the Draft EIR, Section 3.2, "Cultural Resources," page 3.2-11) or visible surface manifestations.

Comment I4-8
It is clear that some in the District consider the Log Cabin a nuisance for a number of reasons and would prefer to remove it over investing in its preservation. The DEIR presents a sketchy, weak and predetermined justification for its preferred action. The cultural resource impacts are multiple, significant, avoidable and poorly mitigated.

Many of us who participated in the Vision Plan process, as I did, clearly communicated the importance of cultural resources and a balanced and diverse view of open space stewardship. MPROSD has an opportunity to demonstrate the goals of the Vison Plan by stabilizing the Log Cabin, with a long-term objective of its rehabilitation in service of public education and enjoyment. I urge you to adopt the Environmentally Superior Alternative and stabilize the Redwood Cabin.

Response I4-8
This comment is noted.

Letter I5 Shani Kleinhaus

May 31, 2022

Comment I5-1
I thank the Midpeninsula Open Space District (Midpen) for providing the opportunity to review the Draft EIR for the Redwood Cabin Removal Project (Project). I reviewed the objectives of the project, potential environmental impacts and mitigations, and the proposed alternatives. I ask Midpen to proceed with the environmentally superior alternative (Alternative 2, Stabilize Alternative), and abandon the efforts to remove the structure.

In this era of climate change and loss of biodiversity, government agencies (especially those charged with the protection of our natural resources) should avoid imposing significant, unavoidable or irreversible impacts to our environment. Impacts are often small, but our climate and biodiversity are experiencing the injuries of billions of little cuts. Any project that can reduce its toll on our water and energy resources and avoid using fossil fuels - should do so.

The project would result in the irreversible and irretrievable commitment of energy and material resources during construction and operation, including the following: water supply for project construction activities; and energy expended in the form of electricity, natural gas, diesel fuel, gasoline, and oil for equipment and transportation vehicles that would be needed for project construction activities.

The EIR proposes that these nonrenewable resources may represent only a very small portion of the resources available in the region and would affect the availability of these resources for other needs within the region. We see this argument contradictory to the mission of Midpen “to protect and restore the natural environment”. Midpen’s vision statement is absolute regardless of “the resources available in the region”, and in our opinion it mandates that the environmentally superior alternative should be chosen.

Response I5-1
The comment states the opinion that the environmentally superior alternative should be chosen because the project would result in the use of energy and material resources during demolition activities. Although CEQA only requires a full evaluation of the project description and an overview evaluation of the project alternatives, it is important to note for the commenter that the Environmentally Superior Alternative does propose the use of energy and material resources over the long-term. If the structure were to remain in place and stabilized for public safety, energy would need to be expended in the form of electricity, natural gas, diesel fuel, gasoline, and oil for equipment and transportation vehicles as well as for construction repair materials to conduct the stabilization work. Moreover, over the long-term, additional fuel would need to be expended to conduct more frequent patrols, provision of defensible space, and maintenance inspections for security purposes, and to address any potential future trespassing, fire safety concerns and periodic structural maintenance needs. The comment is included in the record.

Comment I5-2
CEQA does not require that all objectives of a project be met. In our opinion, the ecological enhancement of the log cabin footprint does not justify the irreversible adverse impacts of the project. We also question the benefits of "biological resources through invasive plant treatment, soil decompaction and amendments, or revegetation at the site", especially in light of the statement that habitat restoration is not included in this project.

Response I5-2
The comment questions the ecological enhancement activities of decompacting and revegetating the log cabin footprint; however, the comment does not address the adequacy of the Draft EIR analysis. The project does include the removal of a built structure located within a forested habitat and returning the natural open space values back to the site through the decompaction of the building footprint, revegetation of the highly disturbed area via reseeding of native Santa Cruz Mountain species, and the removal of invasive plants.

Comment I5-3
In addition, I believe that an alternative that includes stabilization combined with placing an aesthetically-pleasing fence around the log cabin can allow the achievement of most of the objectives (Remove physical hazards to ensure public safety; Reduce structure and wildland fire risk by removing a structure with a history of vandalism; Improve the natural visual character and scenic open space qualities at the site; and Implement a fiscally sustainable project consistent with Midpen's mission as an open space district.

Response I5-3
The comment suggests a stabilize alternative with an aesthetically pleasing fence be considered. Chapter 4, "Alternatives," of the Draft EIR includes Alternative 2: "Stabilize Alternative." This alternative includes stabilizing the existing structure and installing cyclone fencing. Midpen has installed security fences at other preserves and these fences have failed to keep vandals out of buildings. Because the Redwood Cabin is located in a remote location with infrequent visits by Midpen staff, continued vandalism and risk of fire, either to the structure itself or to both the structure and surrounding area, is still expected. Given Midpen's experience with trespassing issues even when a fence (and other measures) are installed, installing an aesthetically pleasing fence would not remove physical hazards or sufficiently address public safety issues. Nonetheless, the commenter's suggested alternative for a fence (or physical barrier) is, generally, already included as an alternative discussed in the Draft EIR; it is, in fact, identified as the Environmentally Superior Alternative. The comment is included in the record.

Letter PH1 Board Member 1

April 27, 2022

Comment PH1-1
The oral comment is summarized as: There is currently no public access, but the Paulin Bridge replacement is in the table of costs. Does that mean there will be future access to the site? No public access seems to be a temporary situation.

Response PH1-1
During the public meeting, Midpen staff explained that while the Master Plan does include additional trails in the northern area of La Honda Creek Open Space Preserve for public access, the timing is currently unknown. Future public access planning of the Redwood Cabin area is not included in the current 3-year Capital Improvement Action Plan. This is also stated in Chapter 4, "Alternatives," of the Draft EIR, on page 4-7. Construction of new trails and opening of this same area to the general public is also not included in the Measure AA 5-Year Project List or Optional Project List that prioritizes Measure AA projects between fiscal year 2023-24 and fiscal year 2027-28.

Comment PH1-2
The oral comment is summarized as: The Draft EIR did not analyze air quality and greenhouse gas (GHG) impacts. The demolition may result in up to 60 tons of waste to haul to Kettleman Hills Landfill, 180 miles from the site. Even 40 tons would create a huge amount of CO_2 and methane. Hauling of 180 miles roundtrip would also create emissions which were not calculated. There are more considerations than just cultural resources.

Response PH1-2
The issues identified were evaluated in the Initial Study checklist included as Appendix B of the EIR. Impacts related to air quality and GHG were determined by modeling the demolition activity, including haul trucks. Based on the modeling results it was determined that the project construction emissions for all criteria pollutants fall below the Bay Area Air Quality Management District average daily thresholds of significance. Air quality and GHG modeling results are included as Attachment A of the Initial Study checklist.

Comment PH1-3
The oral comment is summarized as: When we looked at this before, we thought there were all kinds of log cabins in the area. But the report says there aren't, so this makes it more important.

Response PH1-3
Page 3.2-17 of the Draft EIR states that "a small number of other redwood cabins are located in the Bay Area; however, they do not appear to have been evaluated for CRHR- or NRHP-eligibility, and, therefore, it is not known if they are historical resources under CEQA."

Midpen staff conducted supplemental online research on comparable log cabins within the vicinity of the Redwood Cabin that appear to be remaining examples of a permanent recreational cabin from the 1920s that possess a high degree of integrity, and which are individually representative of the peak of recreational development in the Santa Cruz Mountains during a transition time from tent camps to permanent cabins. Staff research and interviews of longtime local residents generated a list of approximately 20 redwood or log cabins in the greater Bay Area (five cabins are in the Santa Cruz Mountains), and one subdivision of approximately 15 cabins built with redwood railroad ties in the Skylonda community. Of the 35 identified properties in the Santa Cruz Mountains, nine (9) comparable log cabins appear to possess comparable traits associated with the construction method, materials and use as a recreational cabin as well as the cabin retaining its integrity to its original design as a redwood or log cabin. While the age and historic status of some cabins vary or could not be determined through this preliminary research, the District was able to identify 9 comparable log cabins from the original 35 (Page and Turnbull 2022). This additional information does not change the EIR analysis and findings. The comment is included in the record.

Letter PH2 Board Member 2

April 27, 2022

Comment PH2-1
The oral comment is summarized as: The Director expressed strong familiarity of the cabin, having visited and inspected the structure in the past, then states that there are numerous other cabins in the Skylonda area that were developed as summer homes. Probably more than they can remember.

Response PH2-1
The comment presents information based on personal knowledge of the local area. Page 3.2-17 of the Draft EIR states that "a small number of other redwood cabins are located in the Bay Area; however, they do not appear to have been evaluated for CRHR- or NRHP-eligibility, and, therefore, it is not known if they are historical resources under CEQA."

Midpen staff conducted supplemental online research on comparable log cabins within the vicinity of the Redwood Cabin that appear to be remaining examples of a permanent recreational cabin from the 1920s that possess a high degree of integrity, and which are individually representative of the peak of recreational development in the Santa Cruz Mountains during a transition time from tent camps to permanent cabins. Staff research and interviews of longtime local residents generated a list of approximately 20 redwood or log cabins in the greater Bay Area (five cabins are in the Santa Cruz Mountains), and one subdivision of approximately 15 cabins built with redwood railroad ties in the Skylonda community. Of the 35 identified properties in the Santa Cruz Mountains, nine (9) comparable log cabins appear to possess comparable traits associated with the construction method, materials and use as a recreational cabin as well as the cabin retaining its integrity to its original design as a redwood or log cabin. While the age and historic status of some cabins varies or could not be determined through this preliminary research, the

District was able to identify 9 comparable log cabins from the original 35 (Page and Turnbull 2022). This additional information does not change the EIR analysis and findings. The comment is included in the record.

Letter PH3 Board Member 3

April 27, 2022

Comment PH3-1

The oral comment is summarized as: In April 2020, we thought it was potentially eligible for the historic register but now we have the Page & Turnbull evaluation. Where can I get a copy of the Page & Turnbull report?

Response PH3-1

During the public meeting, Midpen staff explained that the Historic Resources Evaluation Report is posted with the Draft EIR as Appendix D. The April 8, 2020 Board report on the item (R-20-35) also explained that:

> A final Historic Resource Evaluation Report is being prepared and will be available in early April 2020 for the La Honda Creek Redwood Cabin. At present, preliminary results indicate that the Redwood Cabin is eligible for individual listing in the California Register of Historical Resources.

Therefore, the Board was notified in April 2020 of the anticipated historic eligibility of the structure based on preliminary findings that Midpen received from qualified historic consultants at that time. Please see the following website for the full text of the Board report: https://www.openspace.org/about-us/meetings/bod-20200408.

3 REVISIONS TO THE DRAFT EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. These are minor, staff-initiated changes to correct typographical errors. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strikethrough~~, and text additions are shown in <u>underline</u>.

The information contained within this chapter clarifies information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

Revisions to Appendix B, the Initial Study

To provide clarification, the checkbox for bullet "b" on page 2-5 of Appendix B of the Draft EIR is revised as follows:

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality.				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	~~☒~~	<u>☒</u>	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

To provide clarification, the first paragraph under bullet "b" on page 2-10 of Appendix B of the Draft EIR is revised as follows:

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than significant ~~with mitigation incorporated~~. Under a project level analysis, the BAAQMD CEQA Guidelines identify whether a project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard through average pounds per day significance thresholds. The project level thresholds were developed to bring the SFBAAB into attainment for the NAAQS and CAAQS and to be protective of human health.

To provide clarification, the second paragraph under Table 2.3-4 on page 2-11 of Appendix B of the Draft EIR is revised as follows:

> The project would implement BMP AQ-1, as described in Section 2.7.3, "Project Specific BMPs" of Chapter 2, "Project Description" of the accompanying EIR. With the implementation of project-specific BMP AQ-1, which contains BMPs required by BAAQMD but not provided in EPG AQ-1, the project would be consistent with the BMP~~M~~s required by BAAQMD and reduce emissions from construction activities. This impact would be less than significant ~~with mitigation~~.

Revisions to Chapter ES, Executive Summary

The second sentence of the first paragraph under heading "ES.2.2 Project Background," on page ES-1 of the Draft EIR is revised as follows:

> The Redwood Cabin was constructed by W.B. Allen from 1927-1928 and served as a recreational retreat for Allen's family and guests, including the YMCA and Rotary Club (LSA Associates 2018; Midpen 2020). The Redwood Cabin was acquired by Midpen in 2002 ~~1988~~ and has since been uninhabited.

Mitigation Measure 3.1-3, beginning on page ES-7 of the Draft EIR is revised as follows:

> ### Mitigation 3.1-3: Preconstruction surveys and nest buffers marbled murrelet
>
> To avoid disturbance and loss of the nests of marbled murrelet Midpen will implement the conservation measures found within the 2016 Biological Opinion on the ESA Section 10(a)(A) permit for habitat enhancement on Midpen preserves (USFWS 2016). These include the following measures.
>
> - Pre-demolition nest tree survey within a quarter mile of the project site for trees that meet the Pacific Seabird Group definition of potential murrelet nesting trees.
> - If a potential nesting tree is detected within 300 feet of the project site or if a murrelet nest is detected, Midpen will notify the USFWS before work begins.
> - If a potential nesting tree is detected greater than 300 feet and less than a quarter mile from the project site, the following will apply:
>   - If possible, work within the project site shall be confined to September 15 to November 1.
>   - If work is scheduled to be performed during the breeding season (March 24 to September 15), disturbance minimization buffers determined by the sound level anticipated from the project will be implemented based on sound level monitoring studied, submitted to USFWS and the table below.
>
> **Buffer distance in feet based on anticipated project sound levels and ambient sound conditions**

	Anticipated Project-Generated Sound Level (dB)[2]			
Ambient Pre-Project Sound Level (dB)[1]	Moderate (71-80)	High (81-90)	Very High (91-100)	Extreme (101-110)
Natural Ambient (≤50)[3]	50 (165)[4,5]	150 (500)	400 (1,320)	400 (1,320)
Very Low (51-60)	0	100 (300)	250 (825)	400 (1,320)
Low (61-70)	0	50 (165)	250 (825)	400 (1,320)
Moderate (71-80)	0	50 (165)	100 (330)	400 (1,320)
High (81-90)	0	50 (165)	50 (165)	150 (500)

[1] Ambient sound level includes all natural and human-induced sounds occurring at the project site ~~stie~~ prior to the project, and not related to the project.

[2] Project-generated sound levels measured at 50 feet from the source

[3] "Natural Ambient" refers to sound levels generally experienced in habitats not substantially influenced by human activities

[4] All distances are given in meters, with rounded equivalent feet in parentheses.

[5] For murrelets, activities conducted during the dawn and dusk periods have special considerations for ambient sound level.

Source: USFWS 2016; USFWS 2020.

- Project activities shall not be conducted within a visual line-of-sightsite distance of 132 feet from a suitable nest tree as designated by a qualified biologist.
- If a sound study is not conducted, no project activities shall occur within a quarter mile of potential nest trees during the marbled murrelet breeding season (March 24 to September 15).
- If project activity takes place during the breeding season (March 24 to September 15) regardless of the distance to potential nest trees, activity will be restricted to 2 hours after sunrise and 2 hours before sunset to minimize disturbance to murrelets that may be flying over the project site to forage at the coast.
- If marbled murrelet protocol level surveys are conducted and do not indicate that the habitat is occupied by marbled murrelet, the seasonal and distance work restrictions may be lifted with written approval from the USFWS.

Revisions to Chapter 2, Project Description

The second sentence of the first paragraph under heading "2.3.1 Background," on page 2-4 of the Draft EIR is revised as follows:

> The Redwood Cabin is a large, side-gabled log cabin with a rectangular plan. The Redwood Cabin was constructed by W.B. Allen from 1927-1928 and served as a recreational retreat for Allen's family and guests, including the YMCA and Rotary Club (LSA Associates 2018; Midpen 2020). The Redwood Cabin was acquired by Midpen in 2002 1988 and has since remained uninhabited. Today, the Redwood Cabin stands in a deteriorated state, posing a significant site safety hazard and has been the site of numerous trespassing and vandalism incidents (including fire ignitions) that raise concerns regarding overall public safety and fire risk within a very high fire severity zone.

Revisions to Section 3.1, Biological Resources

Mitigation Measure 3.1-3, Preconstruction surveys and nest buffers marbled murrelet, beginning on page 3.1-10 of the Draft EIR is revised as follows:

> ### Mitigation 3.1-3: Preconstruction surveys and nest buffers marbled murrelet
>
> To avoid disturbance and loss of the nests of marbled murrelet Midpen will implement the conservation measures found within the 2016 Biological Opinion on the ESA Section 10(a)(A) permit for habitat enhancement on Midpen preserves (USFWS 2016). These include the following measures.
>
> - Pre-demolition nest tree survey within a quarter mile of the project site for trees that meet the Pacific Seabird Group definition of potential murrelet nesting trees.
> - If a potential nesting tree is detected within 300 feet of the project site or if a murrelet nest is detected, Midpen will notify the USFWS before work begins.
> - If a potential nesting tree is detected greater than 300 feet and less than a quarter mile from the project site, the following will apply:
>   - If possible, work within the project site shall be confined to September 15 to November 1.
>   - If work is scheduled to be performed during the breeding season (March 24 to September 15), disturbance minimization buffers determined by the sound level anticipated from the project will be implemented based on sound level monitoring studied, submitted to USFWS and the table below.

Buffer distance in feet based on anticipated project sound levels and ambient sound conditions

Anticipated Project-Generated Sound Level (dB)[2]				
Ambient Pre-Project Sound Level (dB)[1]	Moderate (71-80)	High (81-90)	Very High (91-100)	Extreme (101-110)
Natural Ambient (≤50)[3]	50 (165)[4,5]	150 (500)	400 (1,320)	400 (1,320)
Very Low (51-60)	0	100 (300)	250 (825)	400 (1,320)
Low (61-70)	0	50 (165)	250 (825)	400 (1,320)
Moderate (71-80)	0	50 (165)	100 (330)	400 (1,320)
High (81-90)	0	50 (165)	50 (165)	150 (500)

[1] Ambient sound level includes all natural and human-induced sounds occurring at the project site ~~stie~~ prior to the project, and not related to the project.

[2] Project-generated sound levels measured at 50 feet from the source

[3] "Natural Ambient" refers to sound levels generally experienced in habitats not substantially influenced by human activities

[4] All distances are given in meters, with rounded equivalent feet in parentheses.

[5] For murrelets, activities conducted during the dawn and dusk periods have special considerations for ambient sound level.

Source: USFWS 2016; USFWS 2020

- Project activities shall not be conducted within a visual line-of-sight~~site~~ distance of 132 feet from a suitable nest tree as designated by a qualified biologist.
- If a sound study is not conducted, no project activities shall occur within a quarter mile of potential nest trees during the marbled murrelet breeding season (March 24 to September 15).
- If project activity takes place during the breeding season (March 24 to September 15) regardless of the distance to potential nest trees, activity will be restricted to 2 hours after sunrise and 2 hours before sunset to minimize disturbance to murrelets that may be flying over the project site to forage at the coast.
- If marbled murrelet protocol level surveys are conducted and do not indicate that the habitat is occupied by marbled murrelet, the seasonal and distance work restrictions may be lifted with written approval from the USFWS.

Revisions to Section 3.2, Cultural Resources

The last sentence of the first paragraph under the heading "Project Site History" beginning on page 3.2-10 of the Draft EIR is revised as follows:

Project Site History

The Redwood Cabin is situated on land within the boundary of the former Rancho San Gregorio and is near the site of former lumber mills, including Harrington Mill. According to Midpen's records, the Redwood Cabin was constructed by W.B. Allen as a family retreat from 1927-1928. Allen settled in Palo Alto in 1903 and owned and operated Palo Alto Hardware. By 1918, he purchased 400 acres in La Honda including the subject parcel. With the assistance of Norwegian laborers, Allen constructed the lodge on a bedrock foundation using local timber pieced together without nails. In addition to the lodge, Allen imported stones from the coast to construct walls, stairs, and numerous stone-lined hiking trails throughout the property. In the 1930s, the California Conservation Corps assisted with the improvement of some roads near the property. The Allen family as well as local groups, including the YMCA and the rotary club, used the lodge as a summer retreat for decades. The property remained in the Allen (Paulin) family until 2002 ~~1988~~ when Midpen purchased it.

4 REFERENCES

Chapter 1 Introduction

ZFA. 2020 (March). *Redwood Cabin Structure Stabilization Basis of Design*.

Chapter 2 Responses to Comments

Page & Turnbull. 2022 (September). *La Honda Redwood Cabin Comparative Analysis*. Prepared for Ascent Environmental.

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5 LIST OF PREPARERS

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Appendix A

Comments Received on the Draft EIR

Jared Hart

From: John Harney [redacted]
Sent: Monday, April 18, 2022 10:33 AM
To: Jared Hart
Subject: Cabin removal

[You don't often get email from [redacted]. Learn why this is important at http://aka.ms/LearnAboutSenderIdentification.]

EXTERNAL

We are opposed to the cabin removal APN:075-330-260. There are only a handful of these cabins left. The owners new what they had. They need to put money into it like the other owners of other historic cabins in Skylonda have. Thanks
John and Shannon Harney
Sent from my iPad

1-1

Jared Hart

From: Sheila Brady [redacted]
Sent: Tuesday, April 26, 2022 3:52 PM
To: Reimagining Big Basin; Jared Hart
Cc: Jay Chamberlin; Tracy Bliss
Subject: Redwood Cabin Removal Project EIR Comment

You don't often get email from [redacted] Learn why this is important

EXTERNAL

Hi all,

When I heard about the "Reimagining of Big Basin" project, I forwarded the Page & Turnbull, Inc. Historic Resource Evaluation to assess the Redwood Cabin's eligibility for listing in the California Register of Historical Resources (CRHR). I received a note back from the Reimagining Big Basin Team describing the idea of re-locating the cabin to Big Basin as an intriguing suggestion. You can see the notes regarding this in the appendix at the bottom of this email.

I do not know if further evaluation of that possibility was ever completed. I have copied both the Reimagine Big Basin team and the Midpen team on this note. It would be great if there was an assessment of whether it could make any sense to relocate the Log Cabin to Big Basin thus in one move, save a historic cabin, and replace some of the wonderful historic architecture that we lost in the Big Basin fire.

I realize that there would probably need to be an initial assessment of deconstructing, moving, and reconstructing the cabin in Big Basin and I'd be willing to spearhead fundraising to get that assessment done.

I think that the fact that it is within current memory that rustic houses like the Old Redwood Cabin were heavily in use is important to realize and remember. We take so much for granted about the ease of our existence. It is good to share the tactile memories that a house like this one elicits with our children. And the history of the hard work and courage that it took to build on this land is also an important memory to cherish and respect. There is something about looking at the axe strokes on the end of a log, one of many that make up a building, which says much more than words about how tough it is to survive on the land. Just as a lot of the excellent discussion in the Reimagining Big Basin project centered around the importance of integrating the Native American experience of caring for the land and recognition of the intelligent land and wildlife management used by the native tribes, I think that replacing the old Big Basin cabins which were destroyed in the fire with another cabin of the same age will help us to tie ourselves to that history and recognition of that age.

2-1

I also note that it seems that a paragraph is missing in the notice: https://www.openspace.org/sites/default/files/Notice%20of%20Availability_Draft%20EIR%20for%20Redwood%20Cabin%20Removal%20Project.pdf

In paragraph 2 of the section titled “Purpose and Objectives” the cabin is described as:

"The Redwood Cabin appears to be one of few remaining examples of a permanent recreational cabin in the Santa Cruz Mountains from the 1920s with a high degree of historic integrity— historic integrity refers to a building’s original character and materials, not the physical condition of the building—and is representative of the peak of recreational development in the Santa Cruz Mountains in the nineteenth century (CRHR Criterion 1). It is also a unique example of a rustic recreational cabin in the surrounding area (CRHR Criterion 3).”

This is immediately followed by a paragraph that describes how the cabin was going to be demolished. Isn’t there something missing there?

A paragraph like, “Unfortunately, in spite of the uniqueness of this cabin as described above, the Midpen Board of Directors has done an evaluation which shows that there is no budget set aside to repair it for use, there is no access to the area, there is no intention in Midpen’s plans that there will ever be access to the area, and as the uniqueness of the cabin and its surrounds is a magnet for vandals there is a fear that a fire could be started there where there is no budget for regular patrols. So Midpen’s Board of Directors have determined that, in spite of its historic significance, the cabin’s removal and complete destruction is the best thing for the community.”

I apologize if my rewording of the primary objectives of the project doesn’t correctly capture the goals.

My Dad was a City Planner for the City of Berkeley for many years. I fully understand that compromise is the only way that we can live together and have a civilized society. I realize that with minimal budget Midpen has done and continues to do a great job of protecting the lands and the wildlife of the Midpen districts. I am very grateful for the efforts and the quality of the fine Midpen rangers I have dealt with over the 27 years I have lived up in Skylonda. The reason that vandals hang out in that cabin or around it, is because it is an intriguing and beautiful piece of our local history and it is a magical spot. The fire danger is serious and I fully appreciate Midpen’s efforts to protect my community from fire danger, but if the cabin were moved to a place where it would be welcome, and looked after, maybe it would still be able to cast it’s magic spell there?

Thanks very much for giving me the opportunity to comment.

Sincerely,
Sheila Brady

2-2

Attachments:

Email history with Re-Imagining Big Basin

Begin forwarded message:

From: Reimagining Big Basin <reimagining.bigbasin@parks.ca.gov>
Subject: RE: Old Log cabin
Date: September 8, 2021 at 9:54:39 AM PDT
To: Sheila Brady [redacted]

Dear **Shella:**
Thank you for your interest in the Big Basin Reimagining project. Big Basin Redwoods State Park is a beloved park for Californians, and ensuring recovery and reestablishment is a high priority for California State Parks.

Also, thank you for sharing your 'intriguing' suggestion regarding the re-use of the historic cabin and for including the Page/Turnbull Historic Structures Report. I love the cabin aesthetics and State Parks has worked with Page/Turnbull on similar projects.

The Reimagining Big Basin project is being conducted to define a renewed vision for Big Basin Redwoods State Park, and your input is critical to this process. While this project will define the short- and long-term vision for Park reestablishment, on-the-ground efforts are being carried out to address more immediate recovery needs. In addition to seeking public input regarding the future of Big Basin, this project will provide updates on the park's conditions and recovery efforts and informational and educational resources regarding the challenges and opportunities of reestablishment.

Recovery updates, educational materials, and opportunities will be posted on the Reimagining Big Basin website, and we have added you to our contact list to receive email updates regarding upcoming events and opportunities to participate.

Thank you again for sharing your thoughts, and we look forward to hearing from you more throughout the Reimagining process.

Sincerely,
Reimagining Big Basin Planning Team

From: Sheila Brady [redacted]
Sent: Friday, September 3, 2021 1:39 PM

To: Reimagining Big Basin <reimagining.bigbasin@parks.ca.gov>
Subject: Old Log cabin

Hi there,

I like the Reimagine Big Basin project planning website. It looks like the process is going to be very inclusive! Which is great!

There is an old log cabin on San Mateo County park land that is slated to be destroyed. It is located near the crossroads of 84 and 35. It is a cool old thing, but I believe that it is isolated enough that few people can get to it, and there isn't any nearby parking, and it has structural issues so that there is the possibility of someone getting hurt when they climbed on it, and of course maintenance is costly.

But it is historic, and has been there for 100 years. Here is an assessment made of the cabin:

I was wondering if it might be a cool thing to move to Big Basin as a part of the reconstruction. The logs that I can see don't look ruined at all. It is just in an inconvenient location, and it takes money to maintain it.

Maybe it would be nice to have another historic log cabin in Big Basin to replace some of the treasures that we lost?

I have mentioned this idea to a few local friends who would be willing to do fund-raising to see about getting this cabin moved.

Anyway - for your thought!

Cheers!

Sheila Brady
[redacted]

Jared Hart

From: Jared Hart
Sent: Thursday, May 19, 2022 1:05 PM
To: [redacted]
Cc: Jane Mark; Melissa Borgesi
Subject: RE: Redwood Cabin Removal Project DEIR

Hi Maureen –

Thank you for your interest and comments on the Redwood Cabin Removal Project, Midpen will consider your suggestions below.

Mitigation Measure 3.2-1a is described in the Environmental Impacts and Mitigation Measures section of the Draft EIR on page 3.2-15, and would require Midpen to complete Historic American Building Survey documentation of the cabin prior to demolition. Please let me know if you aren't able to locate the mitigation measure within the document and I will email you a description of the mitigation measure (page 3.2-15) as a standalone document.

Regards,

Jared

Jared Hart, AICP, CPSWQ
Senior Planner
Midpeninsula Regional Open Space District
330 Distel Circle, Los Altos, CA 94022
650.625.6535 (office)
openspace.org

From 50 to Forever: Caring for the land that cares for us – By creating Midpen 50 years ago, our community prioritized clean air and water, healthy habitats for diverse native plants and animals, ecosystems that are resilient to the effects of our changing climate, and places for people to connect with nature – that's what Midpen provides in perpetuity. Celebrate with us all year long at openspace.org/50-years

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From: [redacted]
Sent: Wednesday, May 18, 2022 5:15 PM
To: Jared Hart <jhart@openspace.org>
Cc: Maureen O'Connor [redacted]
Subject: Redwood Cabin Removal Project DEIR

You don't often get email from [redacted] Learn why this is important

EXTERNAL

Dear Jane,
I was at the HRAB meeting today and appreciated your input on the above referenced project.
I went to the EIR report. It is quite extensive.
I could not find 3.2-1A nor could I find any reference to HAPS or HABS using the search option.
I hope you can help me with this. 3-1

Also I have a public comment/suggestion:
The EIR contains some photos of the cabin as it is now. Perhaps Midpen has some additional photos of it now and also in its early historic period. These could be put into a document to preserve its history in hard copy since it will be torn down. This document could be given to the Peninsula Library System and to the local historical museum/association for future reference. The document could include the EIR also since it describes the care that Midpen took in making the decision to tear it down.
If there is any distinctive hardware still on the property, that could be saved and donated to an historical museum in the area near it's former location along with a copy of the document I mentioned earlier. 3-2

Thank you and Midpen for your work on this project.
Sincerely,
Maureen O'Connor
[redacted]

May 30, 2022

Jared Hart, Senior Planner
Midpeninsula Regional Open Space District
330 Distel Ave Los Altos, CA 94022

Comments on Draft Environmental Impact Report for the Redwood Cabin Removal Project

I am writing as a friend and neighbor of the District, and as a professional archaeologist and historic preservation advocate. I am disappointed by the proposal to demolish the cabin, and by the flimsy analysis presented to justify this action in the DEIR. Although there is insufficient information to support a robust decision-making process in the DEIR, it is clear that **the <u>minimum</u> the District should do is to stabilize the hundred-year-old historic log cabin, identified in the DEIR as the "Environmentally Superior Alternative."** 4-1

The 2014 Vision Plan clearly identified cultural resources as scenic resources, and as assets that merit preservation. The Vision Plan includes goals such as

"Protect immediately at-risk, culturally significant resources and promote their responsible stewardship."

"Maintain a sense of place by protecting and increasing access to locally significant, iconic natural or cultural features." 4-2

The Draft EIR for the Redwood Cabin Removal Project ignores these goals, which are not included as "project objectives." Instead, the "project objectives" were carefully engineered to disregard these goals. Two of the objectives are essentially identical: remove physical hazards and reduce structure and wildfire risk.

The analysis in the Draft EIR is internally contradictory on the objective improve scenic qualities. For example, the cabin is identified as having no scenic value because it cannot currently be seen by the public, but removing it is assumed to improve scenic open space qualities. If the site has no scenic value because no one sees it, and public visual access is not a component of the project, then how can scenic value change as a result of the project? **The conclusion that demolishing the historic cabin meets the objective of "improving scenic open space qualities" is not supported.** 4-3

A second example of contradictory and unsupported findings occurs in the brief discussion of the "No Project Alternative" where the DEIR finds that "therefore, no impact to biological resources would occur," but also that "the No Project Alternative would result in Slightly Greater Impact to biological resources than the proposed project." This "slightly greater" impact is due to the lost opportunity to "restore" the site's natural character. **There is no actual analysis of the relative biological benefits of stabilizing the cabin in place, or relocating it, in contrast to the minimal restoration activities described in the project description.** 4-4

The exclusion of the relocation alternative is also unsupported. The assumption that the site for reinstallation must be "undisturbed" and therefore would involve significant impacts is not supported by substantial evidence. One can easily imagine a partially disturbed site in an appropriate setting for the cabin: a parking area next to a trailhead, for example. **The DEIR's conclusion is unsupported**. 4-5

The assessment of biological impacts is also circular in its logic – the report finds that there are no special status botanical species on the site, but then suggests that the project will result in an increase in habitat for such species because of mitigation measures that <u>are not required</u> because there are no special-status species (p. 3.1-8). This circular logic pervades the report.

The DEIR relies upon minimal restoration activities – erosion control covering 0.7 acres of land within a 6,142 acre preserve --- to support a finding of "enhanced ecological function." There is no analysis of whether these activities will enhance ecological function. Unirrigated grass seed covered with straw and mulch have little likelihood for success – and the fire danger associated with this treatment is also unanalyzed. The biological benefits of this minimal erosion control treatment are trivial, although little basis is giving for any findings in this regard. **There is no substantial basis for finding that the proposed project meets the objective of enhancing "habitat and natural ecological function."** 4-6

The analysis of potential impacts to cultural resources is inadequate for archaeological resources. A hundred-year-old remote log cabin site will have buried features, and Native American sites and belongings may be present whether or not the site was disturbed by construction of the cabin. A Record Search is not a substitute for a site inspection and testing by a qualified professional archaeologist. There is no evidence that any archaeologist ever visited the site. This is not an adequate level of effort for identification of potential resources. 4-7

It is also not a best practice to have the construction contractor be responsible for identifying cultural resources during construction and ONLY THEN implementing cultural resource protocols. If MPROSD is going to disregard archaeological site preservation as a goal, at least a minimal program of full-time construction monitoring of all earth disturbing activities by a qualified professional should be required.

4-7 cont.

Summary

It is clear that some in the District consider the Log Cabin a nuisance for a number of reasons and would prefer to remove it over investing in its preservation. The DEIR presents a sketchy, weak and predetermined justification for its preferred action. The cultural resource impacts are multiple, significant, avoidable and poorly mitigated.

Many of us who participated in the Vision Plan process, as I did, clearly communicated the importance of cultural resources and a balanced and diverse view of open space stewardship. MPROSD has an opportunity to demonstrate the goals of the Vison Plan by stabilizing the Log Cabin, with a long-term objective of its rehabilitation in service of public education and enjoyment. I urge you to **adopt the Environmentally Superior Alternative and stabilize the Redwood Cabin.**

4-8

Respectfully,

Laura Jones

Jared Hart

From: Shani Kleinhaus [redacted]
Sent: Tuesday, May 31, 2022 5:02 PM
To: Jared Hart
Subject: Comments on DEIR - Redwood Cabin Removal Project

You don't often get email from [redacted] Learn why this is important

EXTERNAL

May 31st, 2022

Jared Hart, Senior Planner
jhart@openspace.org
Midpeninsula Regional Open Space District

Re: Redwood Cabin Removal Project

I thanks the Midpeninsula Open Space District (Midpen) for providing the opportunity to review the Draft EIR for the Redwood Cabin Removal Project (Project). I reviewed the objectives of the project, potential environmental impacts and mitigations, and the proposed alternatives. I ask Midpen to proceed with the environmentally superior alternative (Alternative 2, Stabilize Alternative), and abandon the efforts to remove the structure.

In this era of climate change and loss of biodiversity, government agencies (especially those charged with the protection of our natural resources) should avoid imposing significant, unavoidable or irreversible impacts to our environment. Impacts are often small, but our climate and biodiversity are experiencing the injuries of billions of little cuts. Any project that can reduce its toll on our water and energy resources and avoid using fossil fuels - should do so.

The project would result in the irreversible and irretrievable commitment of energy and material resources during construction and operation, including the following: water supply for project construction activities; and energy expended in the form of electricity, natural gas, diesel fuel, gasoline, and oil for equipment and transportation vehicles that would be needed for project construction activities.

The EIR proposes that these nonrenewable resources may represent only a very small portion of the resources available in the region and would affect the availability of these resources for other needs within the region. We see this argument contradictory to the mission of Midpen"to protect and restore the natural environment". Midpen's vision statement is absolute regardless of "the resources available in the region", and in our opinion it mandates that the environmentally superior alternative should be chosen.

5-1

CEQA does not require that all objectives of a project be met. In our opinion, the ecological enhancement of the log cabin footprint does not justify the irreversible adverse impacts of the project. We also question the benefits of "biological resources through invasive plant treatment, soil decompaction and amendments, or revegetation at the site", especially in light of the statement that habitat restoration is not included in this project.

5-2

In addition, I believe that an alternative that includes stabilization combined with placing an aesthetically-pleasing fence around the log cabin can allow the achievement of most of the objectives (Remove physical hazards to ensure public safety; Reduce structure and wildland fire risk by removing a structure with a history of vandalism; Improve the natural visual character and scenic open space qualities at the site; and Implement a fiscally sustainable project consistent with Midpen's mission as an open space district.

5-3

Respectfully,
Shani Kleinhaus
Palo Alto