

September 10, 2025

Chair Mary Sackett and Board of Directors

Executive Director Elaine Hogan

Great Redwood Trail Agency
c/o Blue Lake City Hall
PO Box 458
Blue Lake, CA 95525

RE: Public Comment, Great Redwood Trail Agency (GRTA) Board Meeting, September 18, 2025 – CEQA questions and concerns

Dear Chair Sackett, Board of Directors and Executive Director Hogan,

At the recent Great Redwood Trail Town Hall held by Senator Mike McGuire, Redwood Chapter of Sierra Club leaders and our allies hear loud and clear that the GRTA is fully committed to environmental responsibility from start to finish.

At the same time, we remain concerned about the California Environmental Quality Act (CEQA) exemption granted under SB 131 (Section 14) for GRT segments that are funded entirely or in part by funds from Prop. 4 (State Drinking Water, Wildfire Prevention, Drought Preparedness, and Clean Air Bond Act of 2024).

Without CEQA, the processes to survey, identify and mitigate for sensitive habitat, cultural sites, and persistent toxic contamination will **not be legally required** in order to build the trail. For local tribes, whose ancestral territory the GRT runs through, the AB52 Tribal Consultation process will now NOT be triggered. In the absence of a CEQA mandate, groups who want to conduct thorough project analysis in the future may be unable to acquire funding from state agencies to do that work.

CEQA requires environmental and cultural review of the impacts of a project, and allows for adequate public input. The CEQA process will make the GRT *better*, by mitigating for potential habitat degradation and cultural site desecration. The community engagement and assessment of impacts that the CEQA process requires are critical for the Great Redwood Trail to be a project our community can be proud of.

Additionally, we have concerns about your agency's current process and ability to adopt your now complete Master Plan. As we understand it, adopting a Master Plan is a discretionary action of a government agency and requires certifying a CEQA decision.

The undersigned organizations would appreciate a response to the following requests:

1. Will the GRTA confirm that you plan to complete the Programmatic EIR now underway? As this process was begun before the new legislation, is not (to our knowledge) funded by Prop 4, and is a necessary component of adopting the Master Plan, we urge you to complete the PEIR and provide an estimate of when the draft PEIR will be released.

2. Will the GRTA commit to supporting an amendment to SB 131 that would require AB 52 Tribal consultation and community-driven mitigations for sensitive habitat, cultural sites, and persistent toxic contamination regardless of a CEQA process?
3. Will you work with local Tribes to develop a clear, written policy that sets out the GRTA's values and commitments for Tribal Consultation on the Trail project?

We understand and appreciate the GRTA's commitment to the values that CEQA protects, but also urge you to formalize that commitment as a symbol of trust that our communities can rely on.

Please respond at your earliest convenience.

Respectfully,

Perry Lincoln
Michelle Merrifield, Round Valley Tribal Member
Kinest'e Community Coalition

Cassandra May
Board Member
Eel River Wailaki

Valerie Stanley
Spokesperson
Noyo River Indian Community

Morning Star Gali
Executive Director
Indigenous Justice

Teri Shore
Conservation Chair
Alicia Bales
Chapter Director
Sierra Club Redwood Chapter

Alicia Hamann
Executive Director
Friends of the Eel River

Melodie Meyer
Conservation Attorney
Environmental Protection Information Center

Colin Fiske
Executive Director
Coalition for Responsible Transportation Priorities

Richard Gienger
Forests Forever

Patty Clary
Executive Director
Californians for Alternatives to Toxics (CATs)

Sonoma County Climate Activist Network (SoCoCAN!)

Cc: Congressman Jared Huffman's Office

Assembly member Chris Rogers

Senator Mike McGuire