

March 6, 2026

Great Redwood Trail Agency

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**Re: GRTA Master Plan and Appendix H**

Dear Chair Sackett,

The undersigned organizations represent the Great Redwood Trail Friends, a coalition formed out of the No Coal In Humboldt Campaign, and other allies. We advocate for and support Great Redwood Trail development that enhances environmental values, honors Indigenous communities, provides safe recreational and transportation opportunities, and connects communities from Humboldt Bay to San Francisco Bay.

We offer some suggestions for potential improvements to Appendix H, the GRTA's related policies, and the GRTA's public communications about trail development.

First, we suggest that the GRTA develop a public engagement plan as an addition to your Master Plan. This should specify: (a) How and at what planning stage(s) the public and stakeholders will be engaged as part of each GRTA plan or project; (b) How and when the public and stakeholders will receive notice of new documents, plans, or project; (c) What criteria will be used to identify stakeholders for purposes of notification and engagement; (d) How GRTA will respond to input from the public and stakeholders; (e) Any standing or ad hoc advisory committees, their functions and opportunities for membership. In the absence of the familiar CEQA framework, the GRTA and the public would benefit from a clear explanation of how the GRTA will communicate plans, studies and data about trail projects. When studies identified in Appendix H are completed for various trail segments, where will they be published? When and how will the public be notified? These are important details to further your goals of transparent communication with communities affected by trail development.

Second, we suggest that the GRTA develop policy guidance for potentially significant environmental impacts, including for example impacts on ESA-listed species and their habitat as well as impacts on cultural resources. We would respectfully suggest the GRTA adopt policies which provide, for example, that the agency will "avoid to the extent feasible impacts to listed species," and "wherever possible, both avoid any impacts to cultural sites and take feasible measures to prevent such impacts." Similarly, we encourage you to develop a policy for when mitigation measures will be required, and how they may be implemented.

In addition, we strongly encourage the GRTA to develop policy guidance relating to providing river access. The GRT will become one of the most important ways for people to reach and

connect with the Eel River, a goal that is currently shared by many youth-serving nonprofits. A statement recognizing this aspect of the trail and prioritizing river access as a key element of appropriate trail segments would be appropriate. In general, such access points should be restricted or improved where necessary for public safety.

We understand that the GRTA or other entities planning trail segments will still need to consult with various state and federal agencies and secure permitting. However, a policy from the GRTA would help to ensure that environmental standards are uniform and consistent throughout the entire right of way.

Finally, we see a place in Appendix H, page 33, near the end of the 2nd paragraph, that could be strengthened and clarified by changing language from “may” to “shall.”

*“Any terms of approval or contract that are responsive to matters identified for analysis in the completed Checklist **may** be included in implementing agreements between Partner(s) and GTRA, as required terms to be included in design or construction documents, or as otherwise appropriate.”*

We acknowledge and appreciate the tremendous amount of work that has gone into the Master Plan. We also look forward to the many benefits this trail can offer our communities, and appreciate the sentiment that Senator McGuire has often used – that this trail will be built right, not fast. We strongly encourage your board to release documents for public review as early as possible ahead of decision points, and continue to gracefully receive the wide spectrum of feedback the community offers on this project.