

Ron Miska, Assistant General Manager
Marin County Open Space District
3501 Civic Center Drive
San Rafael, CA 94903



Re: Proposed '680' Trail Alternatives and Environmental Review

Dear Ron:

The Marin Conservation League is gratified to know that the Marin County Open Space District (MCOSD) is developing a thorough Initial Study, pursuant to CEQA Guidelines, for the proposed 680 Trail connector between the Loma Alta and the Terra Linda Sleepy Hollow Open Space Preserves. As we understand it, the Initial Study will pay particular attention to geotechnical, and biological conditions and constraints. It will also address safety issues in conformance with Countywide Plan policy TRL.2.3, which states: "Ensure User Safety; Plan and maintain trails to protect the safety of trail users." Other issues in the Initial Study checklist should be addressed, such as esthetics and history/archaeology. Our concern is with the need to consider possible alternative alignments and the appropriate CEQA document in which to do this.

The 680 trail alignment, as presented in plans that are available to the public, involves cutting a new 3.2-mile multi-use trail across the face of relatively steep terrain. The purpose of cutting a new trail is not only to bypass restricted private property but also to achieve a fairly constant seven percent grade (Note that the Luiz Ranch fire road access to the trailhead exceeds this gradient). We have not seen the geotechnical report, but can infer that the alignment, as it cuts across the ridge lands, will disturb erodible soils, cross a number of drainages to Corte Madera Creek, and disturb pristine grassland and wildlife habitat. Thus far, the public has been given no basis for accepting this as the only possible alignment, much less the "environmentally superior" route. Although District staff already may have considered and rejected other alignments for the 680 Trail and selected the proposed trail as the best route on the basis of field study, the public and decision makers need an explanation and environmental justification for that choice. If other alignments, such as using existing fire-roads where possible, have not been considered by staff, we believe they should be and their environmental impacts compared. This comparison would give both the County and public a basis for selecting what is truly the "environmentally superior" trail alignment. Certainly an alignment that makes greater use of existing roads would reduce the amount of grading for a new trail.

Alternatives are not typically considered in Negative Declarations, in which mitigations are incorporated into design of a single project. The 680 Trail has been removed from the District's more deliberate road and trails planning process and is being "fast-tracked" to completion by the end of the year. This may be an unrealistic timeframe. We believe that the public needs to compare alternatives for this trail. Further, the public should be able to review technical reports to determine whether there is substantial evidence of potentially significant impacts that would warrant preparation of a Focused EIR.

PHONE: 415.485.6257
FAX: 415.485.6259

EMAIL: mcl@marinconservationleague.org
URL: www.marinconservationleague.org

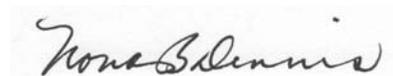
ADDRESS: 1623-A Fifth Avenue
San Rafael, CA 94901



To ensure that an environmentally superior trail alignment is chosen, MCOSD would be well served by taking the time necessary to complete a Focused EIR on the 680 Trail rather than a Negative Declaration. The only other option would be to identify feasible alternatives, clearly show their comparative advantages and disadvantages (impacts), and prepare an expanded Mitigated Negative Declaration that permits public comment and does not foreclose other alternatives.

We hope you will consider this recommendation.

Sincerely,

A handwritten signature in black ink that reads "Nona Dennis". The signature is written in a cursive style and is positioned above the typed name.

Nona Dennis
President

cc.

Chair, Marin County Parks and Open Space Commission
Sandy Guldman, President, Friends of Corte Madera Creek
Supervisor Steve Kinsey
Supervisor Susan Adams