



Protecting Marin Since 1934

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Via email to James.Hansen@Wildlife.ca.gov

Re: Marin County Parks' JARPA application for Hunt Camp Trail Improvements Project

Dear Ms. Fairley and Mr. Hansen:

Marin Conservation League requests that you factor the following comments into Marin County Parks' JARPA application for the subject project.

MCL has been following the implementation of the County's Road and Trail Management Plan for almost four years. The County maintains 16,000 acres in an open space district, distributed among 34 preserves that cover a wide variety of important natural resources, including sensitive plant and animal species and innumerable creeks and streams. We are monitoring each trail project as it is proposed for these open space lands to ensure that it is consistent with key environmental policies and best management practices expressed in the RTMP.

The Hunt Camp Trail project violates environmental policies in both the Countywide Plan and the RTMP in a number of respects and, if implemented, would have significant impacts on sensitive resources. These concerns have been brought to your attention in some detail in letters from the California Native Plant Society and Marin Audubon Society. MCL wishes to echo these concerns and highlight four of them.

1. A key concern is that the County fails to acknowledge that the "improved" trail will invite greater use, even though County's CEQA-compliant "Consistency Assessment" acknowledges that one purpose of the project is to increase opportunities for mountain biking. Any increase in use, primarily by bicycles, will increase the possibility of encroaching into the rich assemblage of rare plants that characterizes the project alignment. Damage from encroachment into rare plants and vegetation is already evident along portions of the existing trail from long usage. The County maintains that usage will

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not increase after the project is complete, but this is countered by evidence that, when a new “single-track” trail is improved and announced as such, the mountain bike blogosphere circulates the information widely.

2. The Applicant asserts that there will be no impacts to vegetation. This fails to acknowledge that almost 90 percent of the trail, including minor realignments, lies within a mapped “Legacy Zone,” the County’s designation for “areas that support unique or irreplaceable remnants of biological diversity, along with other vegetation types with high biological value.” A botanical survey identified nine special status plant species that would be directly impacted by any deviation from the existing narrow path. Such encroachments will inevitably follow intensified recreational use of the trail.
3. The Applicant acknowledges the presence of endangered northern spotted owl (NSO) in the vicinity of the project (the entire Giacomini Preserve is designated as critical habitat), and cites appropriate best management practices to be applied *during construction* but fails to acknowledge the potential longer term impacts of increased recreational use. Unfortunately such impacts are difficult to measure short of the owl’s abandonment of nest or territory, and then it is too late. A full study of the potential impacts to the NSO and its prey should be required.
4. Finally, MCL is concerned that the applicant is relying on a program EIR, prepared in 2015, to cover virtually its entire CEQA obligation as projects within the program are implemented. The program EIR by definition is generic and therefore does not address the specific conditions of each project or project site. Seventy-five best management practices cannot substitute for mitigation measures specific to the unique conditions of the Hunt Camp Trail alignment, as described above. At a minimum, the applicant should have prepared an Initial Study and Mitigated Negative Declaration that might consider alternatives and certainly allow the public opportunity for comment.

MCL appreciates the opportunity to comment.

Sincerely,



Kate Powers, President