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May 15, 2017

Carl Somers, Chief of Planning and Acquisition
Marin County Parks
3501 Civic Center Drive, Suite 260
San Rafael, CA 94903

Subject: Trail Decommission and Adoption Gary Giacomini Preserve; Hunt Camp Trail Improvement Project

Dear Carl:

Marin Conservation League appreciates the opportunity to comment on the proposed subject project. We recognize that this project contains challenging elements and that considerable analysis has gone into developing the proposal. However, after reviewing the related documents and conducting a field visit of the existing Hunt Camp/Juniper Trail and surrounding terrain, MCL cannot support the project as currently proposed.

The Hunt Camp Trail Improvement Project is actually a package of several individual actions that involve improving existing trail, constructing new trail, and decommissioning existing trail lengths. The proposed actions appear to have been assembled into one proposal to demonstrate sufficient environmental benefits ("points") to offset the impacts that would result from implementing the central component, which is to improve the Upper and Lower Hunt Camp (aka Juniper) Trail to accommodate hiker and biker shared use. In our view, the MCOSD is proposing to adopt and improve a trail that will compromise sensitive natural resources and, even with planned improvements to preserve its "primitive nature," will be marginally sustainable and unsafe for two-way travel for visitors, whether on foot or on a bike.

Significance of Legacy Zone. MCL's over-riding issue is that nearly the entire length of the Upper and Lower Juniper Trail lies within the mapped legacy zone of the Giacomini Preserve (Benson 2016). Before the RTMP process began, District staff inventoried the vegetation communities of the 34 preserves and aggregated them into "zones" based on their comparative biological sensitivities. The intent was to guide future planning and management decisions. According to the Vegetation and Biodiversity Management Plan (VBMP), and as noted in the Project Description, legacy zones "include lands that support unique or irreplaceable remnants of natural biological diversity, along with other vegetation types with high biological value . . . a sanctuary for natural resources that otherwise could be permanently lost from Marin, California, and the world" (emphasis added). This inventory and "zoning" concept continue to be among the most important contributions of the VBMP.

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The habitat values of the legacy zone in the project area are well-supported by the survey conducted in 2016 by Shelly Benson, who documented the presence of nine special status plant species, primarily associated with pockets of serpentine scattered within the forest, woodland, and chaparral communities, and three communities (alliances) recognized as rare by the state. Beyond these recognized taxa and communities is the evident biological richness of species along the trail corridor, notably within the diverse and well-preserved ground and shrub layers under the redwood and Douglas fir canopies. Geophytes like fetid adders tongue, trillium, Clintonia, shooting-star, Oakland star tulip, and others crowd the banks of the trail, and openings in the canopy reveal patches of diverse forbs and native bunch grasses. A significant portion of the upper trail traverses the rare *Arctostaphylos montana* Alliance associated with rocky serpentinite-derived soils. Taken together, the areas traversed by the trail constitute a botanical treasure! To limit protection of vegetation to trees greater than eight inches dbh is to ignore the numerous shrub species, such as Western azalea, wood rose, coffeeberry, ninebark, as well as wildflower species of interest. “Improving” this trail in any way, except to repair creek crossings and minor trail erosion caused by foot and bike traffic, could cause irreparable loss and also expose soils to invasion by opportunistic non-natives (or encourage further invasion of chaparral by Douglas fir).

Applicable policies. The priority of the MCOSD to protect such sensitive biological resources in managing its preserves is overwhelmingly supported by policies BIO-1 and BIO-2 in the Countywide Plan; by Goal-1 in the Marin County Parks and Open Space Strategic Plan (2008); and, specifically, by policy SW-22 in the RTMP, which states that “as a general policy visitors will be directed away from areas of high value vegetation types, as identified in the MCOSD’s mapped Legacy Vegetation Management Zones. . . to prevent disturbance and adverse impact.” A stated objective of the RTMP is to reduce environmental impacts over time. Recognizing that many informal trails already existed in sensitive areas like the legacy zones before the preserves had been studied, it follows that an objective of the RTMP also should be to reduce recreational pressures on these sensitive areas over time, or at a minimum, not intensify them.

User experience and safety. Among several stated objectives in the project fact sheet, the Hunt Camp Trail Improvement Project purports to “. . . improve the sustainability of visitor experience.” This is an ambiguous objective, given the distinctly different desired experiences of the visitors who are asked to share the trail – bikers desiring a challenging run down a steep single-track, and hikers desiring a safe and serene walk. We also do not understand the use of the term “sustainability” in this context – a term that the RTMP consistently uses to denote the long-term physical condition of the trail. We disagree that the trail, even with some “improvements” to lessen gradient, will be safe for shared use by pedestrians and bicyclists. To avoid sensitive vegetation, it would be narrow, in some cases traversing steep, banked side slopes, leaving no room for passing without stepping into vegetation (including abundant poison oak) or down slope. The trail is also rocky and “rooty” – to be left in as “primitive” a condition as possible to protect vegetation and also retain the rugged character of the trail. Bicyclists negotiating the trail will have to focus on the trail directly ahead, with little opportunity to anticipate other slow-moving visitors beyond. Proposed improvements will not “maximize” visitors’ safety, as assured by the fact sheet!

Alternative strategies. The dilemma facing the District is how to balance appropriate access with protection of resources. Given the prevalence of legacy zone sensitivities, one solution would be to respect SW-22 policy and prevent entry by decommissioning the trail entirely. However, practical problems are

posed by the long existence and popularity of Hunt Camp and Juniper as “social” trails. To address such problems, the overall project should be disaggregated and the merits of each part examined independently. Certainly the proposed decommissions, two of which are geographically separate, would be beneficial in reducing habitat fragmentation and sediment production, but these are necessary actions under any circumstances and should not be used to rationalize (offset impacts of) the main project.

The Upper and Lower Hunt Camp/Juniper Trail should be viewed as two trails and treated differently. Like many “social” trails in Giacomini Preserve, Lower Juniper Trail currently is a low-impact narrow foot-path created years ago primarily by local residents. To decommission it would be to deprive people of the botanical feast it offers. To expose it to further pressures by designating it for shared use including bikes would invite intensified use and be inconsistent with policy, notably SW-22. A possible solution would be to leave it as a local, non-designated hiking in-and-out trail, signed, however, to prohibit bikes. This would also eliminate the need to construct a new trail for bikes to connect with Manzanita Fire Road.

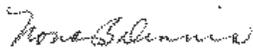
Upper Juniper Trail poses different problems. Steep, rocky, and “rooty,” it has attracted bicyclists for its technical challenges, resulting in significant damage to the trail and adjacent vegetation. Improving the gradient with minor re-routes and repairing the worst of eroded trail surface would lessen but not fully resolve the need for considerable ongoing maintenance. Nor would it improve safety for visitors on foot, in MCL’s view. If designated and improved for shared use, however, hikers would use at their own risk, and a different entry would be necessary at the downhill (north) end, with a sign (or barrier) installed to prevent access to the Lower Trail by bikes. Improving the Upper Trail for ANY visitors would not conform with SW-22, but the practicality of trying to prevent access by decommissioning it is questionable. Ongoing monitoring would be necessary to ensure that rare vegetation along the trail corridor was not damaged due to widening to avoid a deteriorating trail surface.

In conclusion, MCL believes that the proposal as configured presents a serious breach of County , MCOSD, and RTMP policies to protect sensitive resources. Additional time should be spent in considering alternative approaches that are highly protective of sensitive resources and, at the same time, offer practical means of appropriate access.

Sincerely,



Kate Powers, President



Nona Dennis, Chair, Parks and Open Space Committee

cc. Executive Director Max Korten; Senior Resource specialist Jon Campo;

Marin County Open Space District Directors: Dennis Rodoni, Judy Arnold, Katie Rice, Kate Sears, and Damon Connolly