

DATE: June 7, 2017
FROM: Carl Somers, Chief of Planning and Acquisition
SUBJECT: Hunt Camp Trail Improvement Project Update

Background

The Marin County Open Space District (MCOSD) road and trail projects are part of a science-based, public inclusive, [comprehensive plan](#) (RTMP) which addresses the complex challenges of the MCOSD roads and trails. The plan was developed over the course of four years on the basis of extensive [outreach and public input](#).

The MCOSD road and trail projects are designed and implemented to reduce the environmental impact of the road and trail network and enhance visitor experience and safety. The RTMP establishes a process whereby members of the public, working alone or in coordination with others, can submit proposals for projects that will advance the goals of the plan. Proposed projects must demonstrate familiarity and compliance with the RTMP's adopted standards and procedures.

The road and trail designation for Region 2 occurred in late 2015. The Region 2 Designation Workshop was held on October 3, 2015. Following the workshop, the public had an opportunity to view and comment on the proposed road and trail system for Region 2.

Proposed Project

The project would make improvements to the Hunt Camp Trail, including the construction of two trail reroutes (Reroute 1 and 2 on Upper Hunt Camp) and the installation of rock armored wet crossings and bridges to reduce sediment discharge into the watershed. These improvements would reduce steep grades, improve sightlines and would minimize environmental impacts, while maximizing user safety. The project proposes to establish a new connector trail for hikers and cyclists, which would be constructed from the Lower Hunt Camp Trail to Manzanita Fire Road to respect private property rights and reduce unsanctioned trail use through bands of chaparral. Additionally, a small portion of the existing Hunt Camp Trail, connecting to Juniper Avenue, would be designated as hiking only, and would continue to provide a neighborhood connection to open space. To further reduce environmental impacts in the Gary Giacomini Preserve, the proposed project includes the decommissioning of over 6,000 linear feet of unsanctioned trails to reduce erosion and habitat fragmentation.

The proposed reroutes, drain dips, and other actions to protect the environment and improve the user experience would improve the sustainability of the trail consistent with the RTMP policies, applicable BMPs, and trail design standards. These measures would substantially reduce impacts from erosion and runoff into nearby drainages, thereby reducing sedimentation into the Lagunitas Creek Watershed. These improvements would reduce the trail's physical impacts to the preserve and watershed. Based on the recommendations of the feasibility study and staff recommendations the MCOSD is proposing the following project components:

- Upper Hunt Camp improvements;
- Lower Hunt Camp improvements;
- Construction of new hiker/biker connector trail from the Lower Hunt Camp Trail to Manzanita Fire Road and subsequent designation;
- Designate a portion of existing Hunt Camp Trail as a hiker only trail; and
- Decommission and restore a total of over 6,000 linear feet of unsanctioned trails for five segments of unsanctioned trails, identified as trails 25440, 25552, 25710, and 25810.

Administrative Comment Period

MCOSD published the Hunt Camp Trail Improvement Project Description and Fact Sheet on April 13, 2017 and solicited comments from the community during a 30 day administrative comment period. The comment period ended on May 15, 2017 and a total of 134 comments were received from members of the community. The majority of the comment letters (113) submitted to the MCOSD supported the project. Other commenters raised concerns about increased use and posed questions about the efficacy of the project. Specifically, these comments included the following stated concerns:

- The trail decommissionings would reduce recreational opportunities and increase user conflicts;
- Improvements to the Hunt Camp Trail should maintain the narrow and primitive nature of this trail as possible.
- Improving Hunt Camp Trail would reduce the environmental score and the decommissioning of the other trails are not needed to offset impacts.
- Hunt Camp Trail from the Hunt Camp Fire Road should not be designated as Hike/Bike Only. It should be designated as Hike Only.
- Designating Hunt Camp Trail would encourage mountain bikes at unsafe speeds.
- Decommissioning Road 25552 and 25810 would push riders on to Conifer Fire Road, which is unsafe for all parties.
- This project is narrow, steep and goes through environmentally sensitive areas.
- The project site is within northern spotted owl habitat and the project may affect the northern spotted owls.
- The project may increase bike use.
- Bikers don't need parking to access the trail.
- The project is unnecessary and would have detrimental effect on the environment.
- The project traverses the "Legacy Zone" which is intended to protect sensitive plant species.
- Reducing the ecological footprint of the trail would best be accomplished by decommissioning the Upper Trail, but allowing the Lower Trail to remain open to hikers as a social trail, rather than creating a mountain biker/hiker trail in a Legacy Zone.
- The project violates Policy SW 22, which protects the Legacy Zone, and sets a precedent for violating this critical environmental policy.
- Trail segments are steep and probably exceed 10 percent. More specific information on gradients should be provided for public comment.
- The two proposed reroutes would not solve the safety problems inherent in combining hiking and biking.
- The number of streams and springs indicates that the project site is an important part of the watershed.
- The project increases trail density and saturation in this area, especially considering the two adjacent fire roads to its east and west.
- The project would facilitate the Giacomini Preserve becoming a popular mountain bike destination.

- Decommissioning 25810 not only reduces fragmentation, it also protects the safety of hikers and equestrians on Willis Evans Trail.
- Several of the proposed trails to be decommissioned traverse Legacy and Sustainable Natural Systems land (25440, 25552, and 25710) and are appropriate for closure. However, they are not heavily frequented, which reduces the environmental benefit of their closure.
- The need for the Project has not been demonstrated.
- Proposed trail is not wide enough for the safe usage by hikers and bikers.
- Permitting cycling on Hunt Camp Trail would fail to protect native plants and wildlife.

Project Analysis

Factors considered in the project evaluation included the following technical and policy considerations, which are discussed in detail below:

- Effects to trail safety;
- Effects to trail circulation patterns within the preserve;
- Effects to trail sustainability;
- Effects or impacts to natural and/or cultural resources;
- Effects or impacts to maintenance and operational costs; and
- Compatibility with RTMP policies and goals.

Trail Safety

The Hunt Camp Trail currently receives low to moderate use from hikers and cyclists. The primitive rugged surface of trail encourages trail users to travel at reduced speeds to safely navigate the trail cobble. To further reduce the risk of user conflict on the trail, steep trail sections would be decommissioned and rerouted to reduce linear grades and provide better sightlines whenever possible. Additionally, trail side vegetation would be pruned back to improve visibility and sightlines. Bridges and rock armored crossing would be implemented to improve safety for the seasonal wet crossings. The associated decommissions of undesignated trails (25440, 25552, 25710, and 25810) with the Hunt Camp implementation would improve trail safety by discontinuing the use of steep, unmaintained social trails that do not meet MCOSD safety standards.

Effects to Trail Circulation Patterns

As stated in the project description, MCOSD expects the level and types of recreational use in the Gary Giacomini to remain categorically the same as existing use patterns upon completion of the project. The Hunt Camp Trail has been used for hiking and biking for over 40 years by the local communities of San Anselmo, Fairfax, and the San Geronimo Valley. The 2016 Marin County Parks Visitor Study Report illustrated that over half of the people recreating in the MCOSD preserves lived within one mile of the preserve. Adopting Hunt Camp Trail as a hiker/bike use is not expected to significantly change circulation patterns. Implementation of the project would largely legalize existing use patterns demonstrated by public comments received on the project and use tracking as well as provide an alternate egress on to Manzanita Fire Road. The vast majority of public comments received were from locals living in Fairfax, San Anselmo, and unincorporated communities in the San Geronimo Valley who are current trail users. The roads and trails that access the Hunt Camp Trail are very steep and challenging for the average recreational user in addition to extremely limited parking opportunities. It is widely recognized that parking and accessibility are the primary driving factors to limiting recreational use in open space. The associated trail (25440, 25552, 25710, and 25810) decommissions with the Hunt Camp implementation would reduce social trail fragmentation of the open space. Furthermore, trail 25710 and 25810 intersect with private property at different boundary points on the Gary Giacomini

Open Space Preserve, which lead park visitors off of public land and onto private land. The MCOSD does not adopt trails which encourage social trail trespass on neighboring private property.

Effects on Trail Sustainability

The Hunt Camp Trail is currently an unmanaged rocky surface ridgeline trail. The trail has been used by the local community for many decades and has proven to be a popular route with opportunities for environmental improvement. Proposed improvements would reduce linear grades through trail re-alignments in approximately 1,000 feet of steep and erosive sections of trail. The re-aligned sections would be built with best management practices to employ a sustainable design at less than 10 percent grade which would require little ongoing maintenance. Additionally, drainage features such as rolling dips and rock armored causeways would be installed at targeted locations along the trail to drain water off the trail and reduce erosion. Also, sections of trail would be hardened with boulders and cobble to reduce soil erosiveness. The lower portion of trail has nine (9) wet crossings of various size and scale. The project would improve all of the crossings by implementing seven (7) armored fill crossing and 2 recreational bridges to reduce sediment discharge into the Lagunitas Creek Watershed. The associated trail decommissions (25440, 25552, 25710, and 25810) would improve trail sustainability by decommissioning and erosive fall line trails that do not meet MCOSD standards. These poorly performing trails interface with creek crossings without designed drainage features, discharging sediment into the Lagunitas Creek Watershed.

Effects to Natural and Cultural Resources

Initial evaluations indicate there should be no significant impacts to natural or cultural resources associated with the trail adoption and modifications. A complete bio-assessment of the flora and fauna of the site would guide trail construction to minimize the impacts to the natural resources. Other agency permits (Regional Water Quality Control Board, U.S. Army Corps of Engineers, California Department of Fish and Wildlife) would be required for drainage crossing re-engineering necessary for trail sustainability. Plant surveys would also be required as part of project development and implementation. Identified sensitive plant locations, as determined by surveys, would be avoided and/or construction techniques would be modified for minimization of potential impacts. Plant surveys would also be required as part of project development and implementation. Identified sensitive plant locations, as determined by surveys, would be avoided and/or construction techniques would be modified for minimization of potential impacts.

The proposed trail decommissions (25440, 25552, 25710, and 25810) associated with the Hunt Camp Project implementation would further reduce impacts to natural resources by defragmenting the Gary Giacomini Open Space Preserve. The majority of these undesignated trails impact Legacy Zone vegetation communities and are found to be poorly performing redundant trails. This decommissioning would set aside larger areas of open space for wildlife to move through habitat corridors without recreational disturbance.

Effects to Maintenance and Operations Costs

Although the trail is not currently recognized as a system trail it has received a great deal of maintenance from the local community and is in a relatively stable condition aside from a couple of steep trail sections. It is anticipated that through design modifications and re-alignments for sustainability and safety that there would be a significant reduction in trail maintenance required. Furthermore, the local community has expressed a great deal of interest in providing a volunteer workforce to maintain the trail in a sustainable manner. MCOSD estimates that the construction cost would be \$70,000 to complete the safety and environmental improvements to the trail. Maintaining user compliance through signage, education and cooperative efforts with user groups is not expected to create significant additional workload or added cost for park staff. This is a relatively low cost to raise the standards of our trail network and advance the goals and objectives of the RTMP.

Policy Consistency Analysis

As part of the RTMP, the MCOSD adopted goals and policies that direct the designation of, improvements to, and use of its road and trail system. In determining whether to move forward with a project, the MCOSD evaluates it for consistency with these goals and policies. In the case of the proposed improvements to the Hunt Camp Trail, the staff has determined that the project is consistent with and implements these goals and policies.

Goal 1: Establish and Maintain a Sustainable System of Roads and Trails that Meet Design and Management Standards:

The proposed upgrades to the Hunt Camp Trail are consistent with this goal. The MCOSD is proposing to realign existing steep sections to reduce the grade, install drain dips, improve wet crossings, and incorporate other actions to protect the environment and improve the user experience. These measures would improve the sustainability of the trail and are consistent with the design standards and best management practices contained in the RTMP. As such, it would substantially reduce impacts from erosion and runoff into nearby drainages, thereby reducing sedimentation into the Lagunitas Creek Watershed.

Implementing this goal are policies SW.4, TRL-2.1, TRL-2.b, and T2a1, which direct the MCOSD to design and build a sustainable trail system that protects natural resources and reduces the overall environmental impact from current conditions. The existing trail has several segments that are steep and erosive. Additionally, this trail has numerous creek crossings that are in poor condition, discharging sediment into the watershed. The proposed improvements would substantially reduce the running slope of these segments, improve existing creek crossings, and install drainage features that would dewater it without causing significant erosion or sedimentation. The project also includes decommissioning redundant trail segments rerouted by the project. These improvements would reduce the trail's physical impacts to the preserve and watershed.

Goal 2: Reduce the Environmental Impact of Roads and Trails on Sensitive Resources, Habitats, Riparian Areas, and Special Status Plant and Animal Species:

The proposed improvements to the Hunt Camp Trail are consistent with this goal. Implementing this goal are policies BIO-5.f, SW.22, SW.23, SW.24, SW.27, SW.28, and TRL-2.a, which direct the MCOSD to protect rare and sensitive biological and cultural resources and reduce overall impacts compared to baseline conditions. The Hunt Camp Trail is located in an area that provides habitat to a number of sensitive or special status plants and animals. The MCOSD classified vegetation within the preserves into four management zones, based on the ecological and/or cultural importance of distinctive vegetation types, the condition of resources in particular locations, and the proximity of particular locations to urban or suburban areas. As described in the Hunt Camp Improvement Project Description:

"The legacy zone includes lands that support unique or irreplaceable remnants of natural biological diversity, along with other vegetation types with high biological value. The habitats for plants that have been identified as threatened, endangered, or rare in the world, the nation, the state of California, or Marin County are included in this zone, along with wetlands and selected upland vegetation types, including redwood forest, serpentine grasslands, and chaparral. Also included are habitats and vegetation types that are at the boundaries of their geographic distributions and that may be important to detecting, and managing for adaptation to, the effects of climate change. Native vegetation in this zone remains largely intact and free of invasion by nonnative plants. Because of their rarity and ecological importance, many species and vegetation types within this zone are protected by federal and state laws and regulations, or by other initiatives, such as the Upland Habitat Goals Project. The legacy zone will serve as a sanctuary for natural resources that otherwise could be permanently lost from Marin, California, and the world."

MCOSD recognized the importance of preserving and minimizing development and trail construction with the Legacy Zone and protecting our sensitive plant species. As stated in the Project Description, the project site traverses through mixed chaparral vegetation community that contains some rare plant species. The primary purpose of the proposed project is to officially designate an established trail with a pattern of use reaching back many decades as part of the MCOSD trail system in a sustainable manner that reduces the ecological footprint of the trail. Some of the stated objectives of the project are to reduce impacts to rare and sensitive vegetation and reduce habitat fragmentation. Overall, the project reduces the total miles of trail within the Legacy Zone and re-aligns some trail segments to increase habitat connectivity and create increased buffers to especially sensitive plant resources. The RTMP compels the MCOSD to reduce the biological and physical impacts of a project which has components within a sensitive resource area. The majority of the Hunt Camp Trail adoption is within sensitive resource area, therefore the associated decommission of unsanctioned trails are maximized.

Goal 3: Improve the Visitor Experience and Visitor Safety for All Users, Including Hikers,

Mountain Bikers, and Equestrians: The third goal of the plan is to improve visitor experience and safety. The proposed realignment of the Hunt Camp Trail would achieve these benefits by incorporating the trail into the MCOSD system to allow bicycles, reducing its steep grades, and improving the wet crossings. The change in use would allow bicyclists to use the trail to connect to other preserves in the area. Additionally, the improved trail would be easier to use, especially for people with reduced mobility. The improved grade would also reduce erosion impacts and finally, the project would improve the safety of the trail reducing steep grades through reroutes and improving sightlines.

Implementing this goal are policies SW.12, SW.17, SW.19, T.1, T1d, T.3, TRL-2.3, TRL-2.5, and TRL-2.e, which direct the MCOSD to: (1) increase trail connectivity for all users; (2) improve public safety; (3) provide access for people with disabilities; (4) permit mountain bikes on new and existing trails built for that purpose; (5) increase trail opportunities for all users; and (6) provide opportunities for long-distance connections. The proposed project would incorporate the trail into the MCOSD system and would provide hikers and bicyclists with access to the San Geronimo Ridge Fire Road and the White Hill, Loma Alta, and Cascade Canyon Open Space Preserves to the east. Additionally, the proposed modifications to the trail would meet the district's design standards for hiker/biker use trails, including appropriate trail width and sightlines to protect public safety.

The proposed trail project would include measures to improve safety and increase trail connectivity for all users by designing it to meet the MCOSD's multiuse standards. These improvements include realigning the trail to reduce its grade and improving sightlines along the trail. With these measures, the trail would provide a safe experience for various users and would minimize any displacement of other recreationalists.

Policy SW-22: This policy supports directing visitors away from high-value vegetation areas, including within the Legacy Zone to prevent disturbance and adverse impacts. The proposed project is consistent with Policy SW-22 as it selectively reroutes an existing and historic trail to overall improve habitat connectivity for special status species, specifically the Marin manzanita. By not designating the trail at all, MCOSD would not be able to enforce use on the trail or perform needed improvements and maintenance. The trail must be designated in order to protect the watershed and patrol the site. The goal of this policy is to prevent disturbance and adverse impacts. In order to ensure that the project would not disturb sensitive species and cause adverse impacts, the project site was studied extensively by an independent botanist and MCOSD resource staff over the course of several years. A biological report prepared for the project determined that it would not adversely affect sensitive plant species potentially located onsite with implementation of applicable RTMP Best Management Practices.

Note Regarding CEQA Compliance (in response to concerns raised during the comment period)

The project description was provided to educate the public on the scope of the proposed project. It was not intended to satisfy CEQA and therefore did not contain any analysis of potential environmental impacts. The appropriate CEQA path will be determined now that the MCOSD administrative public comment period has closed.

CEQA Guidelines Section 5378, *Project* states that the CEQA "Project" includes:

"the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment".

The term "project" refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. Under CEQA, the Lead Agency (MCOSD) is prohibited from "piecemealing" under CEQA. The State CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA. Under CEQA, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that would have to be approved by responsible agencies. When future phases of a project are possible, but too speculative to be evaluated, the CEQA document should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review. The project description included the proposed decommissionings because these components of the project are in the planning stages and being examined by MCOSD at the same time as the other actions within the same trail complex and Open Space Preserve. Further, this process is supported by the RTMP which states: "*A single proposal may bundle two or more projects if doing so could reduce their combined overall impact compared to the baseline impact (RTMP page 5-8).*" Further, "*When advancing projects in Sensitive Resource Areas, as these are described in chapter 4, the MCOSD project staff will seek to maximize the reduction of physical and environmental impacts. This does not mean that decisions regarding projects in these areas will disregard considerations of fiscal responsibility or visitor experience and safety, but it does mean that considerations of net environmental impacts and sustainability will receive disproportionate weight in these decisions and that, measured on both an annual and cumulative basis, the reductions in physical and environmental impacts should be significantly greater for Sensitive Resource Areas as compared to other areas (RTMP page 5-10).*"

Recommendations

MCOSD recognizes the importance of preserving and minimizing development and trail construction with the Legacy Zone and protecting our sensitive plant species. The primary purpose of the proposed project is to officially designate the established trail as part of the MCOSD trail system in a sustainable manner that reduces the ecological footprint of the trail. In order to develop the proposed trail alignment, MCOSD prepared a preliminary biological assessment and also hired Jason Hoorn of Gold Ridge Resource Conservation District, a professional trail designer to assist in the assessment and feasibility of improvement options for the Hunt Camp Trail. Through the design review process Gold Ridge Resource Conservation District evaluated; public safety, natural and cultural resource management, maintenance, engineering, and visitor services; evaluation of the trail; and final

recommendations. Based on the recommendations of the feasibility study and the public comments received, the MCOSD plans to move forward with the implementation the Hunt Camp Trail Project as described in the project description circulated on the MCOSD website circulated in April 2017.

Next Steps

The next step for the project is to proceed with environmental review to satisfy the requirements of the California Environmental Quality Act (CEQA). CEQA is a statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. The environmental impacts associated with implementation of the RTMP were analyzed in the 2014 RTMP EIR, a certified programmatic EIR evaluating environmental impacts from MCOSD trail projects. The RTMP EIR was certified by the Marin County Board of Supervisors on December 16, 2014.

The appropriate CEQA path for the proposed project will be determined now that the MCOSD administrative public comment period has closed and all comments have been reviewed. MCOSD will proceed with the preparation of a checklist for the proposed project, in compliance with CEQA Section 15162, to determine if the project requires additional environmental review. If the checklist determines that analysis and mitigations are required, MCOSD will prepare a Mitigated Negative Declaration that will be circulated for an additional 30 day comment period. If the checklist determines that the RTMP EIR adequately addresses the project, a Notice of Determination will be filed with the County Clerk, completing the CEQA process.

After completion of environmental review, the next step is for consideration of project approval by MCOSD.