

DATE: December 7, 2018
PRESERVE: Mount Burdell Open Space Preserve
PROJECT: Eagle Rim Trail Improvement Project
STAFF: Jon Campo

Project Summary

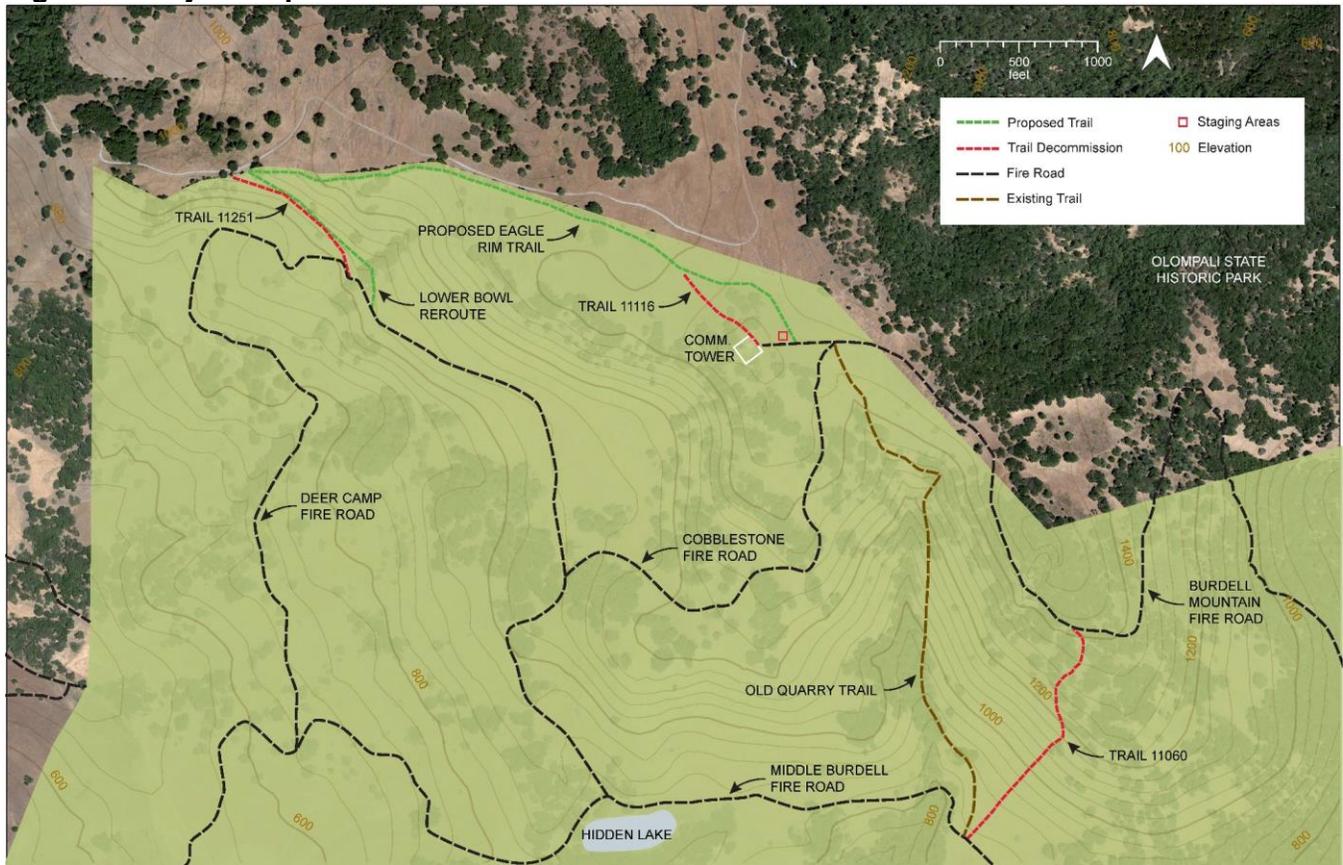
The proposed project is to improve the existing Eagle Rim Trail through proposed realignments, constructing a lower bowl reroute, installing drainage features, decommissioning specific trails, and installing fencing and signage as needed in order to support incorporation of the improved trail into the Marin County Open Space District (MCOSD or District) trail system as a trail designated for use by hikers and cyclists, reduce the trail's impact on the areas hydrology and sedimentation, and improve safety features of the trail (Proposed Project or Proposed Eagle Rim Trail). The Proposed Eagle Rim Trail would be a 4,815-foot long single-track trail, with an average grade of 9.34 percent, that predominately meanders along the northwestern corner of the Mount Burdell Open Space Preserve. As referenced above, proposed improvements to the trail would ensure that it is properly drained, minimize future maintenance, improve sustainability, and improve user safety. Additionally, as referenced above, to meet the Road and Trail Management Plan (RTMP) Policy SW.4: Overall Reduction of Road, Trail and Visitor Impacts, the Proposed Project includes the decommissioning of three unsanctioned trails: Trail 11251, 1116, and 11060. Trails 11251 and 1116 are two segments of the existing Eagle Rim Trail and total 1,401 linear feet. Trail 11060 is a 1,621-linear foot unnamed fall line social trail connecting Burdell Mountain Fire Road to Middle Fire Road, as shown on Figure 1. Decommissioning these trails would reduce erosion and habitat fragmentation.

The proposed realignments, drainage features, 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 Best Management Practices (BMPs), and trail design standards. These measures would substantially reduce impacts from erosion and runoff into nearby drainages, thereby reducing sedimentation into the Novato Creek Watershed. These improvements would reduce the trail's physical impacts to the preserve and watershed. Based on the recommendations of the feasibility study, adoption, and construction of the 4,815-foot Eagle Rim Trail would require the following (Figure 1):

- Improve existing Eagle Rim Trail to meet trail standards;
- Construct lower bowl reroute;
- Install drainage improvements to produce a more sustainable and hydraulically stable trail;
- Decommission trails 11251, 11116, and 11060, totaling 3,022 linear feet;
- Install fencing and signage, as needed; and
- Designate Eagle Rim Trail for hikers and cyclists.

See the initial study (Attachment 1) for a complete description of the Proposed Project and trail details.

Figure 1: Project Map



Background

The MCOSD road and trail projects are part of the science-based, public inclusive, comprehensive plan (known as the “RTMP”), which addresses the complex challenges of the MCOSD roads and trails. The MCOSD developed the plan over the course of four years based on extensive outreach and public input.

The MCOSD designs and implements its road and trail projects 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 would advance the goals of the plan. Proposed projects must demonstrate familiarity and compliance with the RTMP’s adopted standards and procedures.

Public Comments

On May 13, 2017, the MCOSD hosted a community workshop in Novato to discuss the designation of system trails in Region 4 (which included the provisional designation of Eagle Rim Trail). Staff presented a proposed formal road and trail designation for Region 4 open space preserves (Mount Burdell, Rush Creek, Deer Island, Little Mountain, Verissimo Hills, Indian Tree), solicited public input, and described the public process to suggest changes to the proposed designated trail system. The designation map identified the Eagle Rim Trail conditional designation as a system trail pending a project to improve the trail. Following the workshop, the public had an opportunity to view and comment on the proposed road and trail system for Region 4, including the provisionally designated Eagle Rim Trail.

The MCOSD published an initial study for the Eagle Rim Trail Improvement Project on August 14, 2018, and solicited comments from the community during a 30-day comment period. The comment period ended on September 14, 2018, and the District received a total of 68 comments from members of the community. Comments were largely supportive of the project but there were some that stated the following concerns:

- Designation of the Eagle Rim Trail will encourage new spur social trails. How will MCOSD address these social trails?
- Designating and improving this trail will result in increased human activity of this trail resulting in disturbance to sensitive natural resources, flora & fauna
- Designation of the trail will further fragment the habitat and disrupt wildlife
- How will the designation of the trail affect recreation circulation patterns with Olompali State Historic Park which is closed to bikes?

The MCOSD is committed to reducing social trails in open space, and since the implementation of the RTMP in 2016 the District has incorporated significant trail decommissionings into all its trail improvement projects, which has resulted in a significant reduction of social trails within the open space preserves. The MCOSD has had unprecedented success in social trail decommissioning by a variety of site-specific strategies and remains committed to restoring these non-system trails back to natural conditions. These strategies include: physical trail obstruction, stakeholder partnerships, signage, fencing, active revegetation, and rehabilitation. As the District moves to a more managed and sustainable trail network, it will reduce the related social-trail erosion and environmental impacts of the system.

The existing social trail, known as the “Eagle Rim Trail,” has existed since at least the mid-1990s, based on satellite imagery of the area. During that time, the District has not observed that this trail receives heavy use. Access to the trail is potentially the most limiting factor as this backcountry trail is over two miles from the closest access point, at the end of San Andreas Drive, and is a 700-foot climb. The District has adopted and placed signage on similar backcountry trails for which it has conducted pre- and post-adoption monitoring. The District has found that the intensity and type of use changed very little from the process of signing and mapping the trail. Due to the challenging access to the Eagle Rim Trail, the District expects that it will have similar visitor use results. Furthermore, the Eagle Rim Trail is only a one-mile long trail and itself is not a destination, merely an access connection for people hiking or cycling to the summit of Mt. Burdell.

One of the central goals to the RTMP is to reduce the footprint of the roads and trails on open space land. By reducing social trails and encouraging people to use fewer trails, the District is setting more areas aside for wildlife and habitat protection. Consistent with these RTMP goals, the MCOSD is proposing to decommission and restore the contours and vegetation over 3,000 linear feet of trail as part of the Proposed Project.

MCOSD has had remarkable success in reducing the social trail network since the implementation of the RTMP. Part of that success has been due to the approach of bundling trail adoption and trail decommission projects together. This has allowed the District to take a holistic perspective to an area of open space. This approach has allowed the District to continue to reduce fragmentation of open space and maintain a sustainable network of roads and trails.

The Region 4 RTMP designation described the road and trail network for the Mt Burdell Open Space Preserve. The process included releasing a draft of the Region 4 trail-designation map. During the comment period for the draft designation map, the District received numerous comments from the public regarding concern of bicycles riding up to the summit, which is on the preserve, and illegally riding into Olompali State Historic Park (SHP), which does not allow bicycles. Recognizing that the designation of trails on Mount Burdell could lead to an increase of illegal bicycle riding on the SHP, the District selected and designed the Eagle Rim Trail improvements to provide alternative access to the peak of Mount Burdell that is not adjacent to the SHP. The Proposed Project would provide open space visitors legal trail access to the peak of the mountain away from the SHP and would reduce the potential for bikes accessing the SHP from the Mount Burdell Open Space Preserve.

Environmental Review

The MCOSD prepared an evaluation, known as a “consistency analysis,” that determined, pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15162, that the 2014 RTMP EIR alone

did not adequately analyze the Proposed Project, because it would result in potentially significant impacts to tribal cultural resources as defined in Public Resources Code section 21074 and included a provision to allow for work during the rainy season, which were not addressed in the RTMP EIR. Based on this conclusion, the MCOSD prepared an initial study pursuant to Section 15063 of the CEQA Guidelines. This initial study identified mitigation measures that reduced the potentially significant effect to tribal cultural resources and work during the rainy season to a level that is less than significant. The MCOSD filed a notice of determination for a mitigated negative declaration with the Marin County Clerk on December 7, 2018, in compliance with CEQA (Attachment 2).

Consistency Analysis

Countywide Plan Consistency

The Proposed Project is consistent with the Marin Countywide Plan (CWP) for the following reasons:

- A. The Proposed Project is consistent with the CWP woodland preservation policy (BIO-1.3) because the project would not entail the irreplaceable removal of a substantial number of mature, native trees.
- B. The Proposed Project is consistent with the CWP special-status species protection policy (BIO-2.2) because the project would not remove habitat for special-status species of plants or animals.
- C. The Proposed Project is consistent with the CWP natural transition and connection policies (BIO 2.3 and BIO 2.4) because the project would not substantially alter the margins along riparian corridors, wetlands, baylands, or woodlands.
- D. The Proposed Project is consistent with the CWP stream and wetland conservation policies (BIO-3.1 and CWP BIO-4.1) because the proposed trail would not encroach into any Stream Conservation Areas or Wetland Conservation Areas.
- E. The Proposed Project is consistent with CWP water quality policies as the project would reduce soil erosion (WR-1.3, WR-2.2, WR-2.3) because the project would reduce the trail's slope and improve drainage.
- F. The Proposed Project is consistent with CWP seismic hazard policies (CWP Policies EH-2.1, EH-2.3, and CD-2.8) because the project site is not constrained by unusual geotechnical problems, such as existing fault traces.
- G. The Proposed Project is consistent with CWP trail policies (TRL-1.1 and-1.2) because it would enhance and expand the existing countywide trail system, improve access to or between public lands, and enhancing public trail use opportunities for all user groups.

City of Novato General Plan

- A. The Proposed Project is consistent with the Novato General Plan Watercourses, Wetlands and Bayland Area Policies because the project does not affect any streams, creeks, wetlands, baylands, or other watercourses. Additionally, the proposed modifications to the trail and the decommissioning of the social trails would reduce sedimentation into the Novato Creek watershed.
- B. The Proposed Project is consistent with the Novato General Plan Wildlife and Native Plant Protection Policies because it would reduce habitat fragmentation by removing non-system social trails from the area. Additionally, the new trail is predominantly within the footprint of the existing trail and the project would result in a net reduction of linear feet of the trail within the Mount Burdell Open Space Preserve.

- C. The Proposed Project is consistent with the Novato General Plan Woodlands policies because the project does require the removal of any existing trees and the area is predominantly grassland. The project may require tree trimming to improve access and safety, but this would not have any impact on the overall health of the woodlands on Mount Burdell.
- D. The Proposed Project is consistent with the Novato General Plan Scenic Resource Policies because the proposed trail is visually consistent with other trails in the area and the open space characteristics of the preserve. Additionally, the proposed project includes decommissioning of other non-system social trails resulting in a net reduction of trails within the preserve and improving the visual quality of the area.
- E. The Proposed Project is consistent with the Novato General Plan Water Resource Policies because the project will reduce sedimentation into the Novato Creek watershed by improving the trail to reduce its impact on the hydrology of the area and by decommissioning non-system trails within the preserve.
- F. The Proposed Project is consistent with the Novato General Plan Open Space Policies by improving the public access and recreational opportunities within the preserve.
- G. The Proposed Project is consistent with the Novato General Plan Parks and Trails Policies by improving the Mount Burdell trail system to minimize impacts to wildlife, reducing sedimentation, and minimizing impacts to vegetation.

Marin County Open Space District Strategic Plan

- A. The Proposed Project is consistent with the Goals 1 and 2 because it would expand the network of trails in a manner that protects, restores, and preserves the natural systems of the preserve and implement land management best management practices.
- B. The Proposed Project is consistent with Goal 3 because it would improve accessibility to the Mount Burdell Open Space Preserve.

Road and Trail Management Plan Consistency

The Proposed Project is consistent with the Road and Trail Management Plan (RTMP) for the following reasons:

- A. The Proposed Project would improve the visitor experience and provide a range of desired user experiences within the Mount Burdell Open Space Preserve by improving the trail conditions, reducing slopes, and improving drainage (Policy 1).
- B. The Proposed Project would improve sustainability and visitor safety by realigning the trail to reduce steep grades, improve sightlines, install drainage improvements, and establishing clear signage (Policy 2, 4, 7, and 9).
- C. The Proposed Project would minimize impacts to sensitive resources by designing the alignment to reduce trail redundancy and improve habitat connectivity, improving drainage, reduce sedimentation to the local waterways, and maintain habitat for wildlife (Policy 3).
- D. The Proposed Project would enhance trail connectivity by providing an alternate trail to the Mount Burdell Summit (Policy 5).
- E. The Proposed Project provides an alternate route to the Mount Burdell summit to provide an incentive for visitors to stay on MCOSD lands and not trespass on the neighboring property or illegally ride a bicycle on Olompali State Historic Park (Policy 8).

Inclusive Access Plan Consistency

The proposed project is consistent with the Inclusive Access Plan (IAP) for the following reasons:

- A. At the onset of the project design, the MCOSD used the decision-making process identified in the Inclusive Access Plan to determine whether accessible trail design standards apply to the project.

While proposed improvements exceed routine maintenance and the project would adopt the Eagle Rim Trail into the MCOSD trail system as a hike/bike trail, the trail is a remote back country trail that does not connect to a trail that is accessible.

- B. Despite the lack of accessible trail connections, the project would make trail improvements according to accessible design standards where possible. The terrain at the project site prevents full compliance because of the steep topography and obstacles such as rocky terrain within the trail corridor. While the proposed project would improve accessibility and safety by reducing the trail gradient to an average of 10%, maintain cross slopes averaging 3%, improving surface condition to be firm and stable where soils allow, improving site lines, and improving drainage, full compliance cannot be reasonably met without substantial grading, earthwork, and major tree and vegetation removal, including the removal of sensitive plant species protected by state and federal law. The narrow trail width (two to three feet) is also a barrier to meeting accessibility standards. Widening the trail is not feasible for the entire segment due to limitations imposed by bedrock and the trails desired character as a single-track trail, which according to the design standards established in the RTMP is two to three feet.

Action

The General Manager of the Marin County Open Space District has evaluated the Proposed Project and its mitigated negative declaration and hereby approves the Eagle Rim Trail Improvement Project. This decision certifies the proposed project’s conformance with the Marin CWP, City of Novato General Plan, the MCOSD Strategic Plan, and the Marin County Parks Road and Trail Management Plan.

[Original Document Signed](#) _____

Max Korten, General Manager
Marin County Open Space District

Date