



# MEMORANDUM

**DATE:** February 12, 2019  
**FROM:** Carl Somers, Chief of Planning and Acquisition  
**SUBJECT:** Ponti Fire Road to Trail Conversion Project Update

## Purpose

This Memorandum summarizes the public comment received during the public comment period for the [draft Project Description](#), which was conducted November 7 – December 7, 2018.

## Background

The Marin County Open Space District (MCOSD)<sup>1</sup> Board of Directors approved the [Road and Trail Management Plan \(RTMP\)](#) and certified the associated program Environmental Impact Report (PEIR) on December 16, 2014. The purpose of the RTMP implementation is to reduce erosion from the road and trail network and to enhance visitor experiences and safety. The RTMP divided the MCOSD's 34 open space preserves into six regions and provided a process for the public to participate in decision-making regarding the designation of existing roads and trails within each of the open space preserves on a region-by-region basis and for the public to propose projects.

Ponti Fire Road is an existing fire road within Pacheco Valle Open Space Preserve within Region 3 and on Marinwood Community Service District (CSD) property<sup>2</sup>. Region 3 also includes Lucas Valley, Loma Verde, Ignacio Valley, and Indian Valley Open Space Preserves. The [Region 3 proposed conditional designation process](#) occurred in August 2016. The MCOSD approved the Region 3 proposed conditional designation after conducting a public process, including a workshop, and considering all comments received. A result of this process included the proposed conditional designation of the upper segment of the Ponti Fire Road as "*Road to Multiuse Trail Conversion subject to re-alignment*" and the lower segment to remain as a "*Multiuse Fire Road*." The proposed Ponti Fire Road to Trail Conversion Project is the result of a staff driven project that built upon the Region 3 designation process, met the pre-requisites included in the RTMP, and was then prioritized for implementation.

## Proposed Project Setting, Purpose, and Description

The existing Ponti Fire Road is a 1.7 miles long, 14 feet wide, unpaved fire road. It is used year-round as a public recreational trail but has limited access by MCOSD maintenance vehicles and fire and other emergency vehicles due to the geologic instability of the road. The upper segment of the Ponti Fire Road is 1.2 mile in length and is characterized as very steep with gradients between 20 and 35 percent, rendering it poorly suited for trail access. The lower segment of the Ponti fire road is 0.5 mile in length and consists of moderate gradient slopes along the ridge crest and is generally in good condition. There are several undesignated non-system trails associated with the Pontii Fire Road.

<sup>1</sup> The MCOSD is a special district pursuant to the California Public Resources Code. Marin County Parks oversees the management of the county parks system and provides public information on behalf of the MCOSD

<sup>2</sup> As of this writing, the MCOSD is in the process of obtaining a trail easement from the Marinwood CSD. Trails on the Marinwood CSD property were not included on the MCOSD's Region 3 Trail Designation Map because they are not on MCOSD Property. These trails were subsequently identified as redundant and incompatible with the proposed trail alignment through the design process for the proposed project.

<sup>3</sup> A system trail is one that was designated as such or as provisional system trails as part of the Region 3 trail designation process.

The existing Trail 18645 located in Ignacio Valley Open Space District is 5,706 feet in length, 2 to 3 feet wide, undesignated non-system trail between Chicken Shack Fire Road and Thornhill Court. It is a very steep undesignated trail with grades exceeding 50 percent in some places.

The purpose of the proposed project is to implement the RTMP by converting the existing upper segment of the Ponti Fire Road to multi-use trail and implement improvements to provide the public with a safe multi-use trail system that enhances the visitor experience, reduce the environmental impacts of the road on sensitive resources by reducing sedimentation and erosion, and establish a sustainable system of roads and trails that meet design and management standards. The project includes the following elements:

- **Upper Segment of the Ponti Fire Road.** Realign the 1.2-mile upper segment of fire road to a sustainable 5-foot wide multi-use trail. Trail realignment would be accomplished by incorporating approximately 18 switchbacks, also referred to as climbing turns, to reduce existing trail grade from 20 – 35 percent to an average of 10 percent. This would also lengthen the upper trail segment to 2.8 miles. Rock buttresses or retaining walls, the tallest estimated to be 4.5 feet in height, would be required to support the switchbacks and specific locations along the proposed trail alignment. The 5-foot trail width would meet the Novato Fire Department's request for emergency access by all-terrain vehicles (ATVs). Drainage dips would be installed to create a more sustainable trail. The realigned trail would connect to the lower segment of Ponti Fire Road. The final trail layout would be determined in the field by MCOSD staff. After implementation, the upper segment of the Ponti Trail would require dogs to be on-leash, consistent with MCOSD dog policy.
- **Lower Segment of the Ponti Fire Road.** This 0.5-mile lower segment would be maintained as a 14-foot wide fire road multi-use road to maintain access for emergency vehicles. This section would connect to the new connector trail, which would be maintained as part of the proposed project. After implementation, the lower segment of the Ponti Fire Road would continue to allow dogs off-leash, consistent with MCOSD dog policy.
- **New Connector Trail.** Construct a new connector trail from the lower section of the Ponti Fire Road trail to the Pacheco Pathway, which is an existing paved trail adjacent to State Highway 101. The connector trail would be 0.4 mile in length, 5 feet wide, earthen surface, and a grade of less than 10 percent. After implementation, the new connector trail would require dogs to be on-leash, consistent with MCOSD dog policy.
- **Road and Trail Decommissioning.** Approximately 6,900 feet of trail associated with the Ponti Fire Road would be decommissioned. This includes portions of the existing Ponti Fire Road that would become redundant after implementation of the proposed project along with several undesignated, non-system trails. In addition to reducing trail redundancy, the proposed decommissioning would reduce erosion and habitat fragmentation. Trail 18645 in the Ignacio Valley Open Space District would also be decommissioned. In total, approximately 12,606 miles of trail would be decommissioned consistent with RTMP Policy SW.45 – Overall Reduction of Road, Trail, and Visitor Impacts.<sup>4</sup>

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<sup>4</sup> RTMP Policy SW.4 - Overall Reduction of Road, Trail and Visitor Impacts. The designated system of roads and trails will have less overall impact to resources compared to the network of roads and trails existing as of November 2011. Impacts will be reduced by decommissioning non-system roads and trails, and by the improvement, conversion, or rerouting of system roads and trails. The MCOSD will maximize the reduction of road, trail, and visitor impacts in Sensitive Resource Areas compared to Conservation Areas and Impacted Areas. Impacted Areas will exhibit the widest range of acceptable road, trail, and visitor impacts.

- **Signage.** New signage would be installed along the new trail alignment to provide locational information, notices, and MCOSD rules and regulations.

The combined segments, including the realignment of the upper portion of the Ponti trail, improvement of the lower portion of the Ponti Fire Road, and the new connector trail to the Pacheco Pathway would have a total length of 3.7 miles and would provide multi-use shared access for hikers, bicyclists, and equestrians. The proposed project would comply with the IAP's accessibility trail design standards to the greatest degree feasible however, full compliance is not practical because an average slope of less than 10 percent cannot be achieved for the entire length of the trail improvements due to the steep topography. Additionally, the Ponti Fire Road does not originate from an accessible trailhead and the proposed project does not include relocation of the trailhead.

### **Project Description Comment Period**

MCOSD circulated the draft Project Description for the Proposed Ponti Fire Road to Trail Conversion on November 7, 2018 and solicited comments from the community during for a 30-day period. The MCOSD hosted a public meeting at the Marinwood CSD on November 13, 2018. MCOSD staff presented the proposed project, listened to public comments, and requested approval of the trail easement from the Marinwood CSD Board of Directors. The public comment period for the Project Description ended on December 7, 2018. A total of 25 comments were received, which are summarized below into general topic areas followed by a brief MCOSD response.

- **General support for the project.** The MCOSD appreciates public support for the proposed project.
- **Concerns about proposed trail decommissioning.** Some commentators expressed concern that the proposed road and trail decommissioning would reduce a non-designated aggressive, challenging mountain biking trail.

One of the three goals of the RTMP is to reduce the environmental impacts of roads and trails on sensitive resources within MCOSD's Open Space, which the proposed project would accomplish by removing steep, erosive, and unsustainable trails. Additionally, many of the road segments and trails proposed for decommissioning as part of the proposed project would become redundant after the proposed trail improvements are implemented.

- **Concerns about reducing the grade.** Some commentators expressed concern that the proposed project is not reducing the trail grade enough. One of the primary goals for the proposed realignment of the upper portion of the Ponti Fire Road is to reduce the existing 20-35 percent slope to a sustainable and more comfortable recreational experience. After extensive review and consideration of several factors including multiple alignment options, the steep topography, landslide potential, and natural resources within the project area, the realignment options to achieve a grade of less than 10 percent proved to be limited. The proposed realignment of the upper portion of the Ponti Fire Road reduces the existing grade to the greatest extent feasible, in consideration of all the factors.
- **Desire to maintain existing rugged features and character.** MCOSD constructs and maintains a variety of styles of trails from primitive and rugged to a more inclusively accessible trail with a firm a stable surface compliant with the IAP. The proposed project will maintain a certain ruggedness similar to the Big Rock Trail but will not be fully compliant with the Inclusive Access Plan due to the steep topography of the site.
- **Desire for a connection to Fairway Drive.** The existing Ponti Fire Road ascends from the southern slopes of Pacheco Valle and connects with Chicken Shack Fire Road. The proposed project does not change this general alignment. Chicken Shack Fire Road has multiple

connection points including Pebble Beach Fire Road which offers a connection to Fairway Drive which are available to the public.

- **Concerns about off-leash dog walking.** Some commentators expressed concern that implementation of the proposed project would remove existing areas where off-leash dog walking is currently permitted. After project implementation, dogs will be required to be on-leash in the upper section of the Ponti Fire Road because this section will be designated multi-use trail. The lower 0.5-mile section of Ponti Fire Road will remain designated as a multi-use road and will remain available as an off-leash dog walking area.

### **Next Steps**

The next step is to proceed with an Initial Study pursuant to the requirements of the California Environmental Quality Act (CEQA). CEQA is a statute that requires state and local agencies to analyze the effects of proposed projects, identify the potentially significant environmental impacts, and propose mitigation measures to avoid or reduce the significance of identified potentially significant environmental impacts. The Initial Study will be circulated to the public for a 30-day review and comment period.

### **MCOSD Contact**

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