MARIN CONSERVATION LEAGUE

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Dain Anderson
Marin Municipal Water District
220 Nellen Ave.
Corte Madera, CA 94925-1105

By email: danderson@marinwater.org

Subject: Amendment of the Mt. Tamalpais Road and Trail Management Plan – Restoration of Azalea Hill

Marin Conservation League appreciates the opportunity to submit comments on the Initial Study/Mitigated Negative Declaration for the subject project. In accordance with CEQA Guidelines, we request that the MMWD Board consider our comments on October 17 as it determines whether potentially significant impacts of the project have been mitigated adequately and whether benefits of the project outweigh impacts.

The project also requires amending MMWD's *Mt. Tamalpais Watershed Road and Trail Management Plan* (RTMP, 2005), whose primary objective has been to repair hundreds of sources of erosion that deliver sediment into four watersheds that comprise the District's lands. The RTMP anticipated improving the existing Azalea Hill Trail to Class VI standards and rerouting a section to eliminate significant areas of erosion. It did not anticipate developing old Liberty Gulch road as a Class IV road ("multi-use route"), hence the need to amend the Plan.

Taken together, the four parts of the subject project – improving and realigning a portion of the existing Azalea Hill Trail, decommissioning more than four miles of non-system trails that criss-cross the hill, improving the parking area, and developing the multi-use Liberty Gulch Road – would result in benefits but also potentially significant impacts to the environment. These need to be balanced such that the environmental benefits clearly outweigh adverse impacts.

We have divided our comments into two parts: Comments that consider the adequacy of the IS/MND in mitigating the adverse impacts; and comments that consider the overall merits of the project. **Specific recommendations to include in the IS/MND or the Azalea Hill Restoration project are shown in bold face.**

Adequacy of the IS/MND

The IS/MND is not a stand-alone document. To determine whether it identifies impacts and recommends adequate mitigations for this project, one must go back to the program EIR for the RTMP. That EIR identifies a range of impacts that are expected from various types of projects

PHONE: 415.485.6257
FAX: 415.485.6259
EMAIL: mcl@marinconservationleague.org
WEB: marinconservationleague.org
ADDRESS: 175 N. Redwood Dr., Ste. 135
San Rafael, CA 94903-1977

and recommends a palette of mitigation measures to be used, depending on site-specific environmental conditions where a project might occur. For most projects, the mitigation measures and BMPs recommended in the EIR are intended to apply to individual projects and reduce impacts to less than significant levels.

Thus many mitigation measures from the RTMP EIR are incorporated by reference in the Azalea Hill IS/MND, in some cases augmented by additional measures. In many instances, these mitigation measures adequately address potential significant impacts. For example, the impacts of crossing some 25 streams are mitigated through a variety of structures and design techniques and mitigation measures, including Best Management Practices from the RTMP EIR, that will reduce erosion effectively and ensure long-term sustainability of creek and wetland crossings along proposed routes.

The impacts associated with rerouting and improving the existing Azalea Hill Trail are identified and adequately mitigated. Areas of erosion are identified in the RTMP EIR (Page 105), which also identifies sensitive plant communities along the trail and (mostly) avoids them by realigning part of the trail. Impacts that could result from decommissioning social trails across the top and down the slopes of Azalea Hill that currently fragment and damage serpentine grasslands and chaparral are self-mitigated by the proposed improvements and BMPs, and/or mitigated with other appropriate measures. The result will be a significant net environmental benefit. Similarly, the impacts of improving the parking area are self-mitigating by design and represent a benefit of the project.

The IS/MND is flawed, however, because it does not consider the impacts of use. The focus of the IS/MND analysis is on the approximate nine-month *construction period and maintenance activities*. Thus the IS/MND fails to identify the likely impacts of *actual use* of the Liberty Gulch route into the future – whether by mountain bikers, equestrians, or hikers. The CEQA Guidelines section 15063(a)(1) state: "All phases of project planning, implementation, and *operation* must be considered in the initial study of the project." (emphasis added).

The Liberty Gulch route has had very little use in decades. Opening it will significantly increase human use. This is not mentioned anywhere in the document as a cause of impacts. The only reference in the IS/MND to future use of the route is a statement that the project will incorporate "calming" design features to slow bike speed. In contrast, the RTMP and its EIR are explicit in stating (more than once) that ". . . actively used roads and trails generate a chronic, or persistent, type of erosion and source of sediment. Causes include pulverizing and wearing down of the surface by vehicles, horses, bicycles or foot traffic . . ." The RTMP EIR also states that "as trails become incised, they tend to widen as users avoid incised areas." *Use* of a trail also can promote the spread of invasive weeds from seeds carried on boots, tires, hooves, and even clothing. (Note that Mitigation Measure 4-1B in the IS/MND addresses the spread of weeds as an impact, but limits the impact to the construction phase). These are all impacts of recreational *use* that should be included in the IS/MND.

The RTMP (Page 2.6) summarizes these effects as follows:

> "Roads and trails can have many undesirable effects on the environment. They can *increase the number of visitors and intensify human use in seldom-visited areas.* They can provide migration routes for non-native invasive plants into previously un-infested areas and facilitate the spread of Sudden Oak Death syndrome. They can fragment habitats by creating migration or foraging barriers to some wildlife. They can physically remove habitat or a portion of it. Moreover, construction of roads and trails can disturb or destroy, directly or indirectly, plants or animals that are legally protected. Wetland areas, riparian areas, serpentine soils (which are fragile, erodible soils that can contain a host of endemic, rare and endangered species of plants), and active nesting or roosting areas, are all sensitive habitats that require protection in one form or another. Furthermore, *an increase in the density and amount of human presence in previously untrammeled or seldom visited areas leads to an increase in the severity of effects and a proliferation of additional effects."* (Emphasis added)

The centerpiece of the project, the Liberty Gulch route exemplifies this issue. Almost two miles of relatively undisturbed (at least in recent decades) old roadbed will be opened up to intensified recreational use. Roughly two thirds of the route go in and out of sensitive plant communities and would require limited tread improvement. It is our understanding that the western end of this segment was rerouted to avoid serpentine chaparral and therefore was not included in June 2016 botanical surveys. That area may contain sensitive species that could not have been detected in the January survey by Pacific Biology. The other one-third of the route is a "fisherman's trail" that will need to be widened to a four-foot Class IV road (emergency, multi-use route) standard, resulting in direct removal of portions of relatively pristine serpentine communities. These communities could be further disturbed by intensified use of the route, as aptly described in the District's own words above.

While the need to minimize the width of the route to avoid impacts to sensitive resources is obvious, the four-foot tread also represents a *minimum* standard for a safe two-way multi-use route that leaves little room for passing, especially where the route traverses a steep downhill slope at its western end – a potential hazard for all users. This must be viewed as somewhat experimental in that the District is accustomed to multi-use by hikers, equestrians, and bikers only on fire or old ranch roads. Therefore, displacement of slower users due to safety concerns could be an unintended consequence of increased bicycle use.

We acknowledge that the IS/MND project description incorporates design standards, BMPS and "calming" devices into construction of the project to address many of the impacts of improving the Liberty Gulch Route. Mitigation measures from the RTMP EIR include avoiding sensitive resources wherever possible – or, where complete avoidance is not possible, following a recommended protocol to relocate by collecting seed or transplanting, as detailed under Mitigation Measure 4-1A, bullet #4 in the IS/MND (which supplements Measure 3.2-B.2 in the RTMP EIR). As mentioned before, however, these impacts and mitigations are discussed only in the context of construction, and not ongoing use.

MCL requests that impacts of *use* of trail facilities be identified and discussed in the IS/MND

and that additional mitigation measures and/or design features be added to reduce, if not eliminate, impacts of use of the Liberty Gulch Route:

1. **At the main trail head at the upper parking lot, erect interpretive signage (kiosk, etc.) that explains and illustrates the sensitive plants and communities on Azalea Hill, and encourages their avoidance and protection, as discussed on Page 21, IS/MND. Interpretive signage should also be placed at the lower trailhead on Bull Frog Road for both the Azalea Hill Trail and the Liberty Gulch route. In both cases, signs should clearly indicate allowed use and direct bikes away from the Azalea Hill Trail.**

2. **Conduct a botanical survey of the western end of Liberty Gulch route at the appropriate growing season, to complete a comprehensive inventory of sensitive plant species.**

3. **Wherever either the Liberty Gulch Route or the Azalea Hill Trail crosses through sensitive plant communities, incorporate specific design features that clearly demark tread margins (barriers such as logs? rocks?) to prevent encroaching (stepping, riding) into adjacent sensitive vegetation.**

4. **Expand the restoration plan and post-construction monitoring program (Mitigation Measure 4-7B) to include an ongoing-program that monitors the impacts of recreational use on weed invasion (including annual grasses encroaching into native grassland); establish baselines and record any changes due to use and eradicate invasives.**

5. **Include a mitigation measure that outlines a rigorous monitoring program that tracks use of both the Liberty Gulch Route and the Azalea Hill Trail. Incorporating calming features on the Liberty Gulch Route to control bike speed may help to assure other users of a safe experience, but actual behaviors on the route should be monitored. The mitigation measure should note that use of the Azalea Hill Trail by bikes is illegal and will be monitored using a variety of tools, and the prohibition enforced.**

<u>Merits of the project.</u>

This project is complicated from MCL's perspective. As stated above, MCL has followed this project for years. Board members and others have hiked the alignments of both the proposed Liberty Gulch route and the to-be-improved Azalea Hill horse-hiker trail from the top, down (steeply) to Bull Frog Road. The scene across reservoirs and other landmarks in the watershed is hard to equal! Several components of the project make good environmental sense and warrant support; one of them is problematic.

1. <u>Improving the Azalea Hill horse-hiker trail for sustainability.</u> Barry Spitz, in Mt. Tamalpais Trails (2016) (Page 92), describes the Azalea Hill Trail as steep, extremely steep in parts. He writes that it is "in extremely poor condition, with sections dangerous and indistinct. . . the 'traditional' trail continues down 'through a maze of serpentine' and crosses dark, often wet rock. . ." He cautions to descend with care. He also points out attractive natural features – azalea bushes that give the hill its name, and a grove of black oaks and madrones. This appraisal is consistent with the analysis in the IS/MND and argues for

supporting the project. MCL's support is contingent on effective adherence to rules of use.

2. Decommission social trails. Decommissioning a total 4.4-mile network of social trails that crisscross the serpentine-covered slopes of the hill will also be beneficial. MCL appreciates that a main purpose of this project is ". . . to keep cyclists from continuing beyond the road and down the trail, or worse, creating new trails that damage the environment and stress limited enforcement resources." (IS/MND Page 15.) As noted above, this latter objective will only be met effectively if decommissioning is effective for all users and the prohibition of bikes is strictly enforced.

   Note, however, that Barry Spitz, apparently unaware of the botanical significance of chaparral vegetation on the hill, continues: "A path at the crest leads to the 1,217-foot top of Azalea Hill, a side trip definitely worth taking. Wade through the shrubby leather oak and manzanita and over the serpentine rocks to check out even broader views." (Page 92)

   In decommissioning the network of social trails, it may be prudent to select one narrow in-and-out foot path to the top of the hill with minimal disturbance to the serpentine-associated chaparral. Without that option, foot traffic will continue, inevitably, to find a way to the top, which is only 100 yards or so from the existing Azalea Hill Road.

3. Improving the parking area. The parking area off Bolinas-Fairfax Road and ascending fire road is highly eroded and in need of improvement. In fact, MMWD is presenting this project as a sediment control project. Other proposed amenities will be a benefit to all visitors, given the popularity as a trailhead for numerous destinations in the Pine Mt. and Azalea Hill areas. Again, as noted above, signage with appropriate user direction should also be installed at the lower trailhead(s) on Bull Frog Road.

4. Liberty Gulch Route. The Liberty Gulch Route is problematic, for the reasons stated above. To off-set unavoidable impacts along that route, the project will decommission the network of social trails that currently fragment the serpentine communities on much of the hill. It will improve the sustainability of the popular Azalea Hill Trail and the visitor experience for equestrians and hikers. The route also fulfills a long sought objective of the mountain bike community to create a bike-legal connection between the lakes area and Pine Mt. area that avoids the narrow, circuitous Bolinas-Fairfax Road. In so doing, it is also intended to keep bikes from creating social trails across the hill or using the Azalea Hill horse-hiker trail.

   The District's approach to the overall Azalea Hill Restoration Project is a deliberate trade-off of impacts – a compromise solution that will yield net environmental benefits if carefully monitored and legal usage is enforced. Therefore, MCL can support the project.

Thank you for considering our comments.

Sincerely,

Kate Powers, President

Nona Dennis, Chair, Parks & Open Space Committee