



Protecting Marin Since 1934

September 14, 2018

James Raives
Senior Open Space Planner
Marin County Open Space District
3501 Civic Center Drive, Suite 260
San Rafael, CA 94903

JRaives@marincounty.org

Subject: Draft Initial Study/Negative Declaration for Eagle Rim Trail Improvement Project

Marin Conservation League wishes to submit the following comments on the subject IS/Neg. Dec. We appreciate that we have been fully apprised as the project moved forward -- from original designation in the Region 4 Workshop in 2017, to alternative concepts, and eventually to the designed project which is the subject of this document. Throughout this process, staff has carefully studied Mt. Burdell as a whole: its sensitive resources, the existing network of roads and trails and unsanctioned social trails that criss-cross the mountain, and examined how a trail such as Eagle Rim might fit into a reasonable number and network of fire roads and trails. For the record, however, we feel that some points are missing from the Draft IS/Neg. Dec. and should be added or clarified.

3 PROJECT PURPOSE AND NEED; 5 PROJECT DESCRIPTION

One of the specific objectives listed on Page 12 is to "improve the visitor experience for hikers and cyclists," generally cited as MCOSD's objective for all trail improvements. As we have pointed out in previous comments, hikers and cyclists do not always share in their preferred "visitor experience." However, the only way to construct a so-called "single track" trail that is safe and sustainable for shared hiker/biker use, is to improve it by widening and hardening the trail tread. Hikers will accommodate and generally stay on a well-defined trail; with proposed improvements the trail will be more sustainable; but bikers wishing a more challenging experience are tempted to go off trail – to form parallel narrow tracks (sometimes called "eyebrows" where there is a bankside), or, given Mt. Burdell's abundant grassy slopes, form new off-shoots from the intended trail. The evidence of off-trail migration is abundant across all of Marin's public lands.

Section 5.5 Fencing and Signage (Page 17) briefly addresses this issue of off-trail migration by noting that MCOSD would install signage to promote use of the designated trail rather than unsanctioned trails and install fencing to prevent use of decommissioned trails. Further, MCOSD would monitor success of signage and fencing. One standard included in the RTMP (Page 6-2) does address "users veering off designated trails" by applying trail delineation measures, such as wood fencing, vegetation barriers, boulders, and or signs. This standard should be specifically cited and applied in this IS/Neg. Dec.

7.4 Biological Resources

According to anecdotal evidence from visitors who have hiked on Mt. Burdell for many years, formerly abundant native wildlife that were once frequently observed, such as coyotes, badgers, bobcats, foxes, have become increasingly rare. Many factors play into the shifting abundance of wildlife species, but certainly increasing recreational use over recent years has been a significant one on Mt. Burdell. The

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



relatively “wild” lands that adjoin the preserve no doubt have offered refuge to wildlife with the advance of human activity, including dogs. Our concern is that the Eagle Rim Trail penetrates the northern-most parts of the preserve, and that improvements to the trail will increase human activity in this part of the preserve, further inhibiting native wildlife in this area. The concern over increased human activity that comes with improvements to trails is generally dismissed in MCOSD environmental documents as less than significant – or even nonexistent. (See also Section 7.16 Recreation. Setting - a)

We continue to argue, however, that trail improvements, while beneficial in many respects, can have the unintended consequence of attracting more use, with resultant impacts on both sensitive plants and common wildlife. At a minimum, possible off-trail use should be identified as a potential impact in this IS/Neg. Dec., and the standard cited above – delineate trails and use various means to inhibit “veering” off-trail – be applied to “mitigate” the impact.

7.16 Recreation

Without identifying that Mt. Burdell OSP directly abuts Olompali State Historical Park, the Setting (Page 84) states that “these changes (i.e., improvements to eagle Rim Trail) would not impact other regional or local parks.” First, the Setting should note the neighboring presence of Olompali SHP, which could be impacted by any activities on the Mt. Burdell Preserve and therefore should be protected. Further, the Recreation Setting should note that a trail connects the two “parks” and is used by both hikers and cyclists, even though the Olompali trail is closed to bikes. The need to prevent cyclists from entering Olompali has been cited frequently by Marin Conservation League as well as others for many reasons, notably due Olompali’s sensitivity as a cultural resource as well as for safety concerns. The IS/Neg. Dec. should note that signage and other means will be installed on the Eagle Rim Trail to prevent bikes from entering the connecting trail to Olompali.

Thank you for responding to MCL’s concerns.



Nona Dennis
Chair, Parks & Open Space Committee
Marin Conservation League