



MARIN COUNTY BICYCLE COALITION

Marin County Parks
3501 Civic Center Drive, Suite 260
San Rafael, CA 94903
Attention: Jon Campo

May 10, 2017

Dear Mr. Campo,

Thank you for the opportunity to comment on the Project Description (PD) for the Hunt Camp Trail Improvement Project (Project). The Project is a perfect example of what the Road and Trail Management Plan (RTMP) is designed to achieve. The PD and RTMP Programmatic Environmental Impact Report (PEIR) provide a science-based package of information, policies, best management practices, and tools to guide Parks and the public through a process that will enhance recreation while reducing overall impacts on the environment.

The RTMP has three goals:

1. Establish and maintain a sustainable system of roads and trails that meet design and management standards.
2. Reduce the environmental impact of roads and trails on sensitive resources, habitats, riparian areas, native and special-status plant and animal species.
3. Improve the visitor experience and visitor safety for all users, including hikers, mountain bikers, and equestrians.

The PD achieves all of these goals through thoughtful consideration of site conditions and history, a landscape-scale approach to environmental and recreation enhancement, and practical application of trail building best practices. Our comments on the PD are as follows:

Acknowledgement of Site History. Hunt Camp Trail has been used by San Geronimo Valley residents for over 40 years, and is an important recreational connector between San Geronimo Ridge and the valley floor. Hikers, runners, and bikers have shared the trail for decades without incident, and this history of cooperation is reflected in its proposed designation as a hiker-biker trail. Hunt Camp Trail's importance to the

community is underscored by the anonymous locals who have devoted considerable time and effort to maintain the trail over decades.

Recreation in a Legacy Zone. Hunt Camp Trail's alignment largely within a Legacy Zone is both an opportunity and a constraint. The trail's unique landscapes and primitive nature are a large part of its appeal, but its sensitive resources require a conservative approach to improvement that minimizes disturbance and the need for long-term maintenance. We appreciate the measures the PD proposes to avoid impacting and fragmenting sensitive habitats and rare plants, particularly populations of the endemic Mount Tamalpais Manzanita. The abundance of trail decommissioning proposed in the PD demonstrates the seriousness with which Parks is approaching adopting a trail in a legacy zone. The proposed decommissioning of Trails 25440, 25552, 25710, and 25810 will result in significant environmental improvements, especially in the reduction of sediment loads to sensitive downstream habitats. Nonetheless, while we support the proposed decommissioning, we do not believe this project should establish a precedent for projects that are proposed in the remaining three landscape zones, where recreation is more sustainable and would not require as much compensatory decommissioning.

Balancing environmental conservation with recreational access is one of the central challenges of open space management. Instead of simply banning people from places with high resource values, we believe a smarter and more effective long-term approach to achieving proper balance is to consolidate trails into sustainable systems, and educate recreational visitors about why such places are special. For example, the National Park Service (NPS) has been implementing a series of projects in the Presidio Bluffs area of San Francisco that improve and consolidate popular urban trails while restoring sensitive serpentine, coastal prairie, and coastal scrub vegetation communities. Along the way, the NPS has engaged in extensive community outreach that's highlighted the ecological value of the bluffs. Similarly, Marin County Parks' efforts to improve and adopt Hunt Camp Trail can serve as a powerful vehicle to broaden awareness and appreciation of the rare plant and animal communities that call this portion of San Geronimo Ridge home.

Future Use. We concur with Parks that improvement and adoption of Hunt Camp Trail is unlikely to result in a significant increase in use. As previously mentioned, the trail is already a well-established feature that has long been used and maintained by locals. The physical ability required to access the trail is considerable, and well known to those who frequent Giacomini OSP. Coupled with the fact that the Project does not include the construction of any new parking or access features, this will mitigate future use of the trail.

We strongly support construction of the proposed connector between Lower Hunt Camp Trail and Manzanita Fire Road. Building this connector opens up a range of loop possibilities for hikers and bikers that are currently impossible without navigating

excessively steep, loose, and potentially dangerous fire roads. This connector would further leverage the recent investments made by Parks to improve and adopt the Contour, Candelero, and Boulder Spring trails.

Finally, to reduce the potential for erosion from Hunt Camp Trail to impact downstream receiving waters, and to help ensure it lasts for future generations, we would support closures in wet winters for all users. The criteria for seasonal closures should be developed by Parks in consultation with local stakeholders; closure efforts could be managed by Parks staff in cooperation with local volunteers.

Thank you again for the opportunity to comment on the Hunt Camp Trail Improvement Project, and we look forward to partnering with Parks on future RTMP efforts.

Tom Boss, Off-Road Director
Jim Elias, MCBC Executive Director

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