



Friends of Corte Madera Creek Watershed

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May 4, 2010

Supervisor Steve Kinsey
Marin County Board of Supervisors
3501 Civic Center Drive, Suite 329
San Rafael CA 94903

Re: 680 Trail, San Anselmo/Fairfax

Dear Supervisor Kinsey,

Friends of Corte Madera Creek Watershed has major environmental concerns about the new multi-use 680 Trail that you are actively promoting. As you know, this trail traverses lands owned by San Domenico School and the County above San Anselmo and Fairfax. We wrote to the Board in February expressing our specific concerns. A revised route was presented in a public meeting on April 13, 2010; however, the revised route also has major problems. The following comments refer to that alternative.

Geotechnical Hazards

The new, currently undeveloped sections of the proposed trail, 5 to 7 feet wide, cut across unstable hillsides. Although the geotechnical report has not yet been made public, we have access to the map of the area prepared by the California Division of Mines and Geology (DMG Open-File Report 76-2). A comparison of the proposed trail to historic landslides causes grave concern. The trail is in areas mapped in three categories: debris flow landslides, block slump landslides, and slopes exhibiting evidence of continuous or intermittent downslope creep. The long switchback north and east of Lomita is dire; it is intrinsically unsafe and should not be considered viable. To the east of the proposed switchback, the loop to the north of the intersection with the Solstice Trail is a poor alternate to improving drainage along the existing trail. It appears the detour is to avoid an area with abundant seeps; however, we recommend addressing the drainage in that area rather than disturbing the steeper uphill slope, with its risk to hillside stability. Finally, most of the long stretch of new trail sub-parallel to the San Domenico Fire Road is redundant.

To make cuts across these slopes is inviting massive slope failure. There are numerous springs shown on the map, contributing to the risk of failure. Soil from slumps erodes into waterways where it reduces flood capacity and harms aquatic life. Approximately 90% of the sediment reaching Corte Madera Creek in Ross originates in upland erosion, according to a geomorphic study by Stetson Engineers published in 2000. Excessive sediment from Sleepy Hollow will contribute to flooding lower in the Ross Valley, exacerbating problems that have already caused huge expense and damage.

Habitat Fragmentation and Impacts to Wildlife

The affected area already has numerous trails and fire roads. Adding new, redundant trails will further destroy and fragment woodland and grassland habitats, and facilitate the spread of invasive non-native plants. The major switchback route traverses an area of native grasses and badger dens. There may well be populations of special status plants in the area. The area appears to be important hunting habitat for raptors, so the project should be evaluated with regard to the Migratory Bird Treaty Act and the Eagle Protection Act. We look forward to a full discussion of biological resources when all the reports, including the report by Wildlife Research Associates, are finally released.

Unrealistic Goals for Shared Use

For most of its length, the proposed trail parallels existing fire roads that could serve the same purpose. To suggest that extensive new trail construction is necessary for safe use by mountain bikers, equestrians, and hikers ignores the reality that a trail heavily used by mountain bikes is virtually never used by equestrians and gets very light use by hikers. A trail used equally by all three groups is an ideal espoused by planners, but not realistic. Eldridge Grade on MMWD land precisely illustrates this reality.

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San Domenico School does not have a prohibition against mountain bikes on single-track trails, so a better option for the 680 Trail would be to recognize that the dominant user group of the 680 Trail would be mountain bikers, many of whom relish the steep slopes and challenging terrain. Let them use existing trails and fire roads, without widening any on San Domenico School property. We recognize that the school would like less public use of the lower section of the San Domenico Fire Road, and we accept that a link to the fire road bypassing the Hetfield property is consistent with the easement agreement with the school. We urge you to advocate for land-swap discussions between Mr. Hetfield and San Domenico so that a longer section of the existing fire road can be used, making a long new trail unnecessary in that area. To reduce impacts, any new trails should have a maximum width of 3 feet, rather than the proposed 5 to 7 feet.

Fiscal Considerations

Building a trail that is 5 to 7 feet wide on steep hillsides will require extensive excavation and construction of high retaining walls and trail surface stabilization. The numerous drainages in the area will require several bridges. Maintenance of even a well-designed trail in this environment will also be a demanding and expensive task. Does the County have adequate funding to complete construction, repair incidental damage caused during construction, and fully fund maintenance of the entire 680 Trail? Can the County meet its obligations to San Domenico to adequately maintain the trail and to repair landslides attributable to the surface disturbance? Is this trail an appropriate use of County funds?

Environmental Review

A Mitigated Negative Declaration is not appropriate CEQA compliance for a project that has potentially significant impacts and is as controversial as the 680 Trail. We request that a focused EIR be prepared to deal with geotechnical issues, hydrology, visual resources, and biological resources. It should also analyze the likely users of this trail and how best to serve them. Another compelling reason for preparing an EIR is to ensure that an adequate analysis of alternatives is conducted. Clearly, there are ways to establish connectivity in this area without such massively destructive trail building.

We fail to see the rationale for this damaging, wasteful project, which seems to have been designed with the aim of a 7% trail grade in total disregard of other factors, including the obvious possibility of linking existing routes to achieve a connection across the head of the watershed. In addition, the access routes at either end are steep fire roads defying the 7% rule.

We urge you to step back from your insistence on building the 680 Trail as currently proposed and take the time to fully evaluate the impacts, financial and political, of its construction.

Sincerely,

Sandra Guldman, President

c: Harold C. Brown, Supervisor, District 2 (email)
Linda Dahl, Director and General Manager, Parks and Open Space District (email)
Ron Miska, Assistant General Manager, Parks and Open Space District (email)
Thomas McInerney, Council Member and Chair, San Anselmo Flood Committee (email)
Roger Roberts, Marin Conservation League (email)