

RESPONSE TO COMMENTS

NEGATIVE DECLARATION

Camp Tamarancho Mountain Bike Trail System Improvements Project

Prepared for:

Marin County Community Development Agency, Planning Division (MCCDA)

3501 Civic Center Dr., Suite 308

San Rafael, CA 94903

Tammy Taylor

Senior Environmental Planner

(415) 473-7873

Tammy.Taylor@MarinCounty.gov

Prepared by:

Grassetti Environmental Consulting

7008 Bristol Drive

Berkeley, CA 94705

May 2025

INTRODUCTION

The Proposed Negative Declaration (ND) for the Camp Tamarancho Mountain Bike Trail System Improvement Project was circulated for public and agency review from February 26, 2025 through March 31, 2025. Due to County offices being closed on March 31, 2025 in observance of Cesar Chavez Day, comments were accepted in-person through April 1, 2025.

A number of comments were received on the document. This Response to Comments document includes the comments received and a discussion of how the environmental issues raised in the comments have been addressed in this Response to Comments document, and the Final ND. The IS/ND has been revised as needed based on the responses to these comments. In addition, the County has made minor clarifications to the Final IS text. These revisions to the IS/ND were only minor clarifications that do not trigger recirculation. None of the responses to comments resulted in changes to the impact significance conclusions in the IS/ND (per State CEQA Guidelines Section 15162).

Comments were received from the following individuals and organizations:

Commenter	Date	Letter	Letters Attachment Pages
Wittenkeller	03 07 25	A	1
Tatum	03 10 25	B	2
Tatum	03 10 25	C	3
J. Beck	03 18 25	D	4
Oei	03 20 25	E	5
Liskamm	03 23 25	F	6 – 9
Warner	03 24 25	G	10
Liskamm	03 24 25	H	11
Meliuk & Stryhas	03 27 25	I	12 – 14
Luchessa	03 27 25	J	15 – 17
Ruggles	03 27 25	K	18 – 20
Kreinberg	03 27 25	L	21 – 23
Johnson	03 27 25	M	24 – 26
Hug	03 27 25	N	27 – 29
Ruley	03 27 25	O	30 – 33
Culhane	03 27 25	P	34 – 36
Tumminia	03 27 25	Q	37 – 39
Schmidt	03 28 25	R	40 – 42
Tibbs	03 31 25	S	43

Response to Comments

Brody	03 30 25	T	44 – 45
Morita	04 01 25	U	46 – 48
Reale	03 30 25	V	49 – 50
Dybeck/Curfman (Scouting America, Marin County Chapter)	03 31 25	W	51 – 56
Morgan	03 30 25	X	57 – 59
Pedersen	03 30 25	Y	60
Bria	04 01 25	Z	61 – 63
Maxwell	04 01 25	AA	64 – 66
M. Beck	04 01 25	BB	67 – 69
Liebscher	04 01 25	CC	70 – 72
Simon	04 01 25	DD	73 – 75
J. Beck	04 01 25	EE	76 – 150
Howard	04 01 25	FF	151 – 153
Calonico	04 02 25	GG	154 – 156

These letters, with individual comments numbered and keyed to the responses, are included as an attachment at the end of this Comments and Responses document (Letters Attachment).

RESPONSES TO COMMENTS

Letter A: Mark Wittenkeller

The comment supporting the project is noted.

Letter B: Cheryl Tatum

The comment expresses concern regarding potential erosion and noise impacts. Please see Responses to Comments 2, 3, and 5, in Letter F (below) regarding these issues.

Letter C: Cheryl Tatum

Please see response to Letter B, above.

Letter D: Jon Beck

Please see Response to Comment 1 in Letter F, below.

Letter E: Brian Oei

The comment supporting the project is noted.

Letter F: Thea Liskamm

Responses to numbered comments are provided below:

Comment 1 - Notification: Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15087, the Notice of Availability (NOA) was published in the Marin Independent Journal, a newspaper of general circulation, on Wednesday, February 26, 2025 announcing the start of the public comment period. Additionally, copies of the notice were mailed by U.S. Postal Service to surrounding property owners within 625 feet of the two project parcels, the notice was published on the State Land Use and Climate Innovation (formerly Office of Planning and Research) CEQA Submit webpage, the NOA was posted on the Marin County Clerk's bulletin board, and the NOA and Initial Study/Proposed Negative Declaration were posted on the County webpage with email notifications sent to subscribers of the project webpage all on the same opening day of the comment period. Any interested party could also visit the front counter of the Marin County Community Development Agency Office and request to view a hard copy of the Draft Initial Study (IS)/Negative Declaration (ND). Moreover, commentors had the opportunity to submit written comments by email, hard copy, and/or deliver them in person at the front counter. Hence, the County met and exceeded, its legal obligation to provide adequate public notification of the NOA for the project Draft IS/ND.

Comment 2 – Hydrology and Water Quality: The soil erosion, stormwater flows, drainage patterns, and water quality issues are addressed in Section 10, Hydrology of the IS. Landsliding and slope stability issues are addressed in Section 7, Soils and Geology, in the IS. As discussed in those sections, the Project area is subject to erosion, landsliding, and high-water flows during extreme rainfall events. Studies have indicated that that project would not aggravate these existing conditions. No evidence is provided in the comment that the proposed Project would exacerbate these existing conditions. No substantial evidence supporting fair argument to the contrary has been received by the County. (State CEQA Guidelines Section 15384). Also, see response to Comment 4, below.

Comment 3 – Soils and Geology: As described in Section 7, Soils and Geology of the IS, portions of the project area are prone to landsliding, and several landslides have been mapped along the Caballo Rojo Trail alignment. As described in the section, while areas of the Project trails could be affected by landslides, as designed and based on past trail construction activities in the Camp Tamarancho trail system, trail construction is unlikely to trigger landslides or substantial erosion. No substantial evidence supporting a fair argument to the contrary is in the record.

Comment 4 – Nuisance Impacts: It is acknowledged that some users of the Camp Tamarancho mountain bike trails may create nuisance conditions (i.e. cyclist-related noise and rapidly descending bike traffic – see discussions below) with respect to nearby residents. The Project would make relatively minor changes to the existing trail system which would not increase the number or change the behavior of cyclists. The trail construction proposed by the Project would be re-routes of existing trails and re-routing of descending bikes from Iron Springs Road to the Caballo Rojo Trail. The proposed improvements are intended to reduce traffic hazards and erosion. The Project would not provide new access to the trail system where access currently does not exist. Use of the trail system is not anticipated to increase beyond existing levels.

Comment 5- Noise Impacts: It is acknowledged that existing noise associated with cyclists entering and exiting the existing Camp Tamarancho trail system may disturb neighboring residents. As described above and addressed on pp. 101-102 of the Final IS/ND, the proposed Project would not increase use of the facility and, therefore, would not increase noise from Camp Tamarancho trail system users on Iron Springs Road beyond existing levels. Further, cyclists descending on the proposed extension of Caballo Rojo Trail would be more distant from houses along Bothin and Iron Springs Road than at present, potentially reducing cyclist noise effects to those residents.

It also is acknowledged that the house at 137 Iron Springs Road was inadvertently omitted from Project location figures. This omission does not affect the noise impact analysis in the IS. The conclusion of impact remains less than significant. The commenter's request that the Camp Tamarancho operators work to reduce existing noise associated with facility cyclists is acknowledged and has been noted as a project merits issue.

Comment 6 – Traffic Safety Impacts: The commenter's concern regarding bicycle/motor vehicle conflicts on Iron Springs Road is acknowledged. The proposed Caballo Rojo segment of the

Project is intended to reduce potential for these conflicts by reducing downhill (fast-moving) bicycle traffic on the upper part of road compared with existing conditions, thus improving traffic safety. Parking is currently not permitted along Iron Springs Road, nor as part of the proposed Project, and the Project would not facilitate any other additional parking. As discussed in response to Comment 5, above, the Project also would not increase use of the facility, and therefore would not increase traffic accessing the facility.

Comment 7- Cumulative Impacts: Please see responses to Comments 2-7, above regarding Project impacts. Cumulative development is defined as overlapping impacts of the proposed Project and other projects causing related impacts (State CEQA Guidelines Section 15130 (a) (1)). No cumulative development is proposed along Iron Springs Road. The County Public Works Department is currently working with the applicant to address past unpermitted trail work. Under CEQA, past trail work, some of which occurred 20+ years ago, is considered part of the existing conditions for purposes of evaluating the proposed Project.

Analyses of potential Project alternatives are not required in an IS. Project components are intended to increase traffic safety and reduce environmental impacts of existing trails.

Letter G: David Warner

The comment supporting the Project is noted.

Letter H: Thea Liskamm

Please see responses to Letter F, above.

Letter I: Maryia Melink and Anton Strykas

Please see responses to Letter F, above.

Letter J: Michael Luchessa

Please see responses to Letter F, above.

Letter K: Karen Ruggles

Please see responses to Letter F, above.

Letter L: Janette Kreinberg

Please see responses to Letter F, above.

Letter M: Randall and Sharon Johnson

Response to Comments

Please see responses to Letter F, above.

Letter N: Richard Hug

Please see responses to Letter F, above.

Letter O: Anne Ruley

Please see responses to Comments 4, 5, and 6 in Letter F, above.

Letter P: Nancy Culhane and Family

Please see responses to Letter F, above.

Letter Q: Charles Tumminia

Please see responses to Letter F, above.

Letter R: Jenny Schmidt

Please see responses to Letter F, above.

Letter S: Lisa Tibbs

Response to March 22 Letter: Please see Responses to Letter F, above.

Response to March 30 Letter: Comments regarding past flooding and erosion on the commenter's property are acknowledged. The Project does not include any trails or other improvements that would re-purpose the neighboring residents' back yards for the use of a new bike park. Rather, one property owner has agreed to allow a trail to run through their property.

Letter T: Jonathan Brody

With respect to Soil Stability Please see response to Comment 3 in Letter F, above. Comments on noise are addressed in Response to Comment 5 in Letter F, above.

Letter U: Nancy Morita and Michael Emery

Comment 1: Please see response to Comment 5 in Letter F, above, with respect to noise. Please see response to Comment 4 in Letter F, above with respect to nuisances from existing cyclists. Please see response to Comment 2, below, for impacts to wildlife.

Comment 2: Natural habitat impacts are evaluated in Section 4, Biological Resources section of the IS, which included a field reconnaissance of accessible parts of the proposed trail alignments. The analysis concludes that the proposed project, with the incorporation of the County's standard conditions of approval and incorporated practices from the County's Road and Trail Management Plan, would have less-than-significant impacts on natural habitat and special status species, including the Northern Spotted Owl. As shown on Table BIO-2, p. 58 in the IS/ND, the project sites have low suitability for the California Giant Salamander. Michael's Piperia is special status with a California Rare Plant Rank of 4.2. However, it is unlikely to occur at Camp Tamarancho, as the nearest the Marin County records for the species are from Point Reyes. The other plants mentioned in the comment are not special-status species.

Comment 3: Existing illegal bike trails are not part of the proposed Project. It is acknowledged that occasional unpermitted nighttime use of the facility may currently occur. As described in the IS Project Description section, p. 9, Camp Tamarancho trails are open only during daylight hours; night riding is prohibited and nor is it being proposed as part of the Project. There is no Use Permit being proposed as part of the Project application.

While the current unpermitted trail may or may not have been professionally built, the County's Public Works Department would inspect the proposed Project trails and bridges for construction methods and design. Bridges also would be subject to County Design Review. The structural design of the bridges will be reviewed by CDA Building & Safety prior to the issuance of construction (building) permits.

The unpermitted trail noted in the comment (Hobo Trail) is unrelated to the proposed project or the Camp Tamarancho trail system .

Comment 4: The proposed Caballo Rojo trail, one segment of the Project, is intended to reduce the potential for automobile/bike conflicts, and would also reduce bike use of the Iron Springs Road overall. This should reduce the need for emergency medical services, including MEDEVAC helicopters, associated with bicycle accidents on this portion of Iron Springs Road.

Comment 5: The proposed Caballo Rojo trail and the other trail work proposed by the Project does not closely parallel any creek. Rather it removes unstable creek crossings and builds boardwalks and bridges to avoid creeks. The Project would result in a net benefit to the creeks and drainage channels. See also response to Comment 2 in Letter F, above.

Letter V: Eva Reale

Comment 1: Geologic issues - Please see response to Comment 3 in Letter F, above.

Response to Comments

Comment 2: Issues of fiscal responsibility are not addressed in CEQA. The trails would be managed by the Marin Council, Scouting America (MCSA). Work performed by affiliated cycling groups and volunteers would be under MCSA management.

Comment 3: Noise Issues: Please see response to Comment 5 in Letter F, above.

Comment 4: The commenter's opposition to the project is noted.

Letter W: Michael Dybeck, Marin Council, Scouting America

Comment 1: The comment regarding thinned fuels and Tamarancho vigilance regarding fires is noted.

Comment 2: The Tamarancho Fuel Reduction and Community Protection Program that has been implemented on Camp Tamarancho is noted.

Comment 3: The applicant's meeting with neighbors is noted.

This letter suggests a number of minor edits to the document. None of these edits change the substance or conclusions of the IS. These clarifications have been made in the Final IS, as noted below.

Comment 4: p. 5: Correction made

Comment 5: p. 7, first paragraph: Sentence deleted

Comment 6: p. 7, last paragraph: correction made

Comment 7: p. 9: bullet point deleted

Comment 8: p. 9, Original Loop discussion: the phrase "for use by the public" has been deleted.

Comment 9: p. 9, additional Trails section: suggested change has not been made.

Comment 10: p. 12: Suggested edits have been made.

Comment 11: p. 17: Suggested revisions made

Comment 12: pp. 45, 46, 47, 48, 73, 99, and 100 : Text has been revised to include construction methods described on p 29.

Comment 13: p. 35: "Mitigated" deleted.

Comment 14: p. 38: Sentence summarizing biological resources impact of the project has been added.

Comment 15: pp. 39-40: Requested revisions to Aesthetics discussion, Item c, have been made in the Final IS.

Comment 16: p. 44: text has been revised.

Comment 17: p. 55: Correction to delete "MND" has been made.

Comment 18: The requested language regarding the applicant's proposed location, avoidance ,and protection of the native grasses and the stand of Mt. Tamalpais manzanita (*Arctostaphylos montana ssp. montana*) has been added to the IS/ND text.

Comment 19: p. 63: Text regarding Northern Spotted Owl use of the area has been added to the IS.

Comment 20: p. 70: The requested Archaeological Report has been provided to the applicant. Note that this report is confidential and is not available to the public.

Letter X: Jeffrey Morgan

Please see responses to Letter F, above.

Letter Y: Brian Pedersen:

Comment supporting the project is noted.

Letter Z: Virginia Bria:

Please see responses to Letter F, above.

Letter AA: Lila Maxwell

Please see responses to Letter F, above.

Letter BB: Marla Beck

Comment 1 - Safety: The commenter's concerns regarding bicycle accidents are noted. Please see response to Comment 6 in Letter F, above. As described in response to Comment 4 in Letter F, above, the Project is not expected to increase use of the Camp Tamarancho facility.

Comment 2 - Water flow and Drainage: Please see response to Comment 2 in Letter F, above.

Comment 3 – Noise: Please see response to Comments 4 and 5 in Letter F, above. The Project would not substantially change the number of cyclists using the facility and road.

Comment 4 - Parking: The concerns expressed in the comment are acknowledged. As discussed in response to Comment 4 in Letter F, above, the Project would not substantially change the number of cyclists using the facility and road.

Comment 5 – Courtesy: The comment's concerns regarding courtesy are acknowledged.

Comment 6 – Previously Submitted Comments: Please see Responses 17-22 to Letter EE for responses to earlier comments sent to County Planning.

Letter CC: Sheryl Liebscher

Please see responses to Letter F, above.

Letter DD: Rebecca Simon

Please see responses to Letter F, above.

Letter EE: John Beck

Comments 1-8: Please see responses to Letter BB, above.

Comments 9-16: Please see responses to Letter F, above.

Comment 18 – Previously Submitted Comments: With respect to April 1, 2025 attachment, the commenter’s opposition to the Project is noted. Past construction on the Warner property associated with the Caballo Rojo Trail is being addressed by the County Department of Public Works. As described in the IS Project Description section, past construction is considered part of the environmental baseline (existing conditions) for CEQA analyses.

Comment 19: Please see response to Comment 6 in Letter F above with respect to traffic safety concerns. Please see response to Comment 8 in Letter F, above, regarding Alternatives.

Comment 20: The Comment questions the increased safety stated as a Project objective. The Lower Caballo Rojo Trail extension would be one-way down, to relocate existing downhill bicycle traffic from Iron Springs Road. This would remove many downhill riders travelling at speed from that segment of Iron Springs Road, resulting in reduced potential for bicycle/pedestrian and bicycle/vehicle conflicts on the avoided road segment. It is acknowledged that vehicles and pedestrians below the confluence of the proposed Caballo Rojo trail extension and Iron Springs Road would not experience any changes in bicycle-related conflicts.

Comment 21: The comment asserts that that Project promotes and expands the use of the trail system. The proposed Saddlecut Fire Road and Broken Dam Trail improvements are re-routes of existing trail segments to avoid existing eroding areas, thus resulting in a net environmental benefit. The existing segments would be removed after the re-routes are constructed. None of these trails would alter existing access coming uphill from Fairfax, and they would not bring access to the Camp Tamarancho trailheads closer to Fairfax.

Comment 22: CEQA is intended to focus on a Project’s impacts on the environment. The geological and hydrologic issues noted are impacts of the environment on the Project. Such

impacts only need be considered in CEQA documents if a project would exacerbate those conditions¹. As described in the IS/ND, that is not the case here.

Comment 23: Please see response to Comment 5 in Letter F, above. The comment's objections to this conclusion are noted.

Letter FF: David and Sandra Howard

Please see responses to Letter F, above.

Letter GG: Fred Calonico

Comments 1-8: Please see responses to Letter F, above.

Comment 9 – Flooding along Bothin Road: The concerns raised regarding Bothin Road flooding issues are acknowledged. Flooding of the small watersheds on the slopes of Mt. Tamalpais is common due to the steep and “flashy” nature of the watersheds. This flooding is often accompanied by high winds, which, in combination with the saturated soils and steep slopes, results in toppling trees. Heavy rains on steep slopes also can result in landsliding. Climate change may be further intensifying storm rainfall and winds. The comment provides no substantial evidence that bike trails are affecting runoff quantities, flooding, or tree toppling. The trails cover a very small portion of each sub-watershed and are not impermeable. Further, they are designed to direct runoff water within its watershed of origin. Additionally, there is no substantial evidence in the record to support a fair argument that the proposed Project would cause any new flooding related impacts or further any such existing impacts.

Errata

It is acknowledged that the home at 137 Bothin Road was inadvertently omitted from the Project site plan (PDF p. 26).

¹ California Building Industry Association v Bay Area Air Quality Management District (S213478, December 17, 2015).