

DRAFT Addendum to the 2014 Road and
Trail Management Plan Tiered
Programmatic Environmental Impact
Report:
Inclusive Access Plan

Marin County Open Space District
July 8, 2016

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Introduction and Summary

Purpose of this Report

This report has been prepared by Marin County Parks (the Lead Agency¹) as Addendum to the 2014 Final Tiered Programmatic Environmental Impact Report for the Road and Trail Management Plan (RTMP TPEIR) pursuant to Section 15164 (Addendum to an EIR or Negative Declaration) of the California Environmental Quality Act (CEQA) Guidelines. This Addendum describes the changes and additions to the RTMP TPEIR necessary to achieve CEQA compliance for the Inclusive Access Plan (IAP).

On November 6, 2007, the Marin County Community Development Agency certified the 2007 Marin Countywide Plan EIR. The Marin Countywide Plan EIR addressed the environmental implications resulting from the Marin Countywide Plan. The Marin Countywide Plan is a comprehensive update for the 1994 Marin Countywide Plan, which includes a Natural Systems and Agriculture Element, Built Environment Element, and Socioeconomic Element. The Natural Systems and Agriculture Element provides goals, policies, and implementing programs relating to trails in Marin County.

On December 16, 2014, the Marin County Open Space District (MCOSD) Board of Supervisors certified the RTMP TPEIR. The RTMP TPEIR, which addressed the environmental implications resulting from the RTMP. The RTMP tiered off the 2007 Marin Countywide Plan and has comprehensive coverage for establishing and maintaining a sustainable system of roads and trails that meet management standards; reduce environmental impact of roads and trails on sensitive resources, habitats, riparian areas, and special status plant and animal species with the implementation of best management practices (BMPs); and improve visitor experience. The RTMP and the objectives contained in the RTMP apply to roads and trails located within existing or future MCOSD preserves, and existing or future trail easements maintained by the MCOSD². The 2014 RTMP EIR addressed all of the environmental topics in Appendix G³ of the CEQA Guidelines.

The MCOSD and Marin County Parks Department (Parks Department) are managed under the umbrella label of Marin County Parks. The MCOSD owns and manages 34 open space preserves, while the Parks Department manages 19 parks (County Parks) owned by the County of Marin. In addition, Marin County Parks manages numerous trails on land owned by other public agencies through operation and maintenance agreements. County parks and other public lands were not considered as part of the “Project Area” as defined in the RTMP TPEIR.

The Inclusive Access Plan (IAP) is a supplement to the RTMP to help guide the accessibility component, which aims to increase the equitability of access to Marin County Parks trails. The IAP includes:

¹ The CEQA Guidelines define the “Lead Agency” as the public agency that has the principal responsibility for carrying out or approving a project.

² RTMP Policy SW.1

³ Appendix G covers the following environmental topics: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural and Historic Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Utilities and Service Systems, Mandatory Findings of Significance.

- Definitions, policies, and the regulatory framework related to accessibility;
- The criteria and decision-making process used to incorporate accessible trail design;
- Standards for accessible trail design; and
- The communications strategy intended to assist planning efforts for people with disabilities.

The trails chosen for accessibility improvements in the IAP are located throughout Marin County, California. The Addendum evaluates how the proposed projects would affect road and trail management actions for the trail network owned, managed and/or operated by the Marin County Parks. As stated previously, the trail network is located within MCOSD preserves, county parks, and on other property where Marin County Parks has secured rights through easements or other agreements. The network of roads and trails is comprised of numerous public trails across public and private lands that link the preserves to the surrounding communities. The approximately 250 miles of unpaved roads and trails traversing the preserves represent roughly 44 percent of the estimated 640 miles of unpaved roads and trails, on public lands, in all of Marin County (Marin County 2007).

The following public agency approvals are expected to be necessary to implement the currently proposed IAP:

California Coastal Commission,
California Coastal Conservancy,
California Department of Fish and Wildlife,
Department of Toxic Substances Control,
San Francisco Bay Regional Water Quality Control Board,
San Francisco Bay Conservation and Development Commission,
United States Fish and Wildlife Service, and
United States Army Corps of Engineers.

The purpose of the RTMP TPEIR Addendum is to describe the changes or additions to the RTMP TPEIR necessary to provide the CEQA documentation necessary for Marin County Parks' consideration of the IAP.

As the Lead Agency, Marin County Parks also intends for this RTMP TPEIR Addendum to provide the CEQA documentation necessary for consideration of the IAP project by Responsible Agencies⁴ and Trustee Agencies⁵, which are the public agencies listed above.

Future IAP projects would be subject to internal Marin County Parks review of the Initial Study checklist during the feasibility study phase to determine if any further CEQA analysis is required in order to add accessibility components to sites outside of the scope and details of the current plan.

⁴ Under the CEQA Guidelines, the term "Responsible Agency" includes all public agencies, other than the Lead Agency, which have discretionary approval power over aspects of the project for which the Lead Agency has prepared an EIR.

⁵ Under the CEQA Guidelines, the term "Trustee Agency" means a state agency having jurisdiction by law over natural resources affected by the project which are held in trust by the people of California.

Addendum Determination

Marin County Parks has determined that preparation of an Addendum to the EIR pursuant to Section 15164 of the CEQA Guidelines is the most appropriate method for evaluation of the IAP project. Section 15164 (a) of the CEQA Guidelines states:

The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

Section 15162 (a) of the CEQA Guidelines states:

(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based on the information in this report, Marin County Parks has determined that the necessary changes and additions to the RTMP TPEIR identified in this report meet the above CEQA criteria requiring preparation of an Addendum to the RTMP TPEIR. This document constitutes that Addendum (Addendum to the 2014 Road and Trail Management Plan Tiered Programmatic Environmental Impact Report).

Summary of Addendum Conclusions

The “Proposed Project Changes” section of this Addendum describes the specific differences between the IAP and the RTMP. The “Current Relationship to RTMP TPEIR” describes how the

differences between the RTMP and IAP might affect the impact conclusions of the RTMP TPEIR. The “Current Relationship to the RTMP TPEIR” verifies that *the revisions incorporated in the current IAP would not result in new significant environmental effects or a substantial increase in the severity of the significant effects identified in the certified RTMP TPEIR.*

The RTMP TPEIR concluded that the RTMP project proposed at that time would not have resulted in any significant unavoidable impacts.

Proposed Project Changes

The project area evaluated in the RTMP and RTMP TPEIR was restricted to 34 MCOSD open space preserves. The major components of the RTMP include:

- Framework for Science-based Management (RTMP Chapter 3)
- Road and Trail Visitor Use Policies and Management (RTMP Chapter 4)
- Road and Trail Decision Making Process (RTMP Chapter 5)
- Road and Trail Standards and Best Management Practices (RTMP Chapter 6)

The Inclusive Access Plan modifies and/or expands the:

- Project area (extends beyond the current MCOSD open space preserve boundaries),
- Road and trail policies as it relates to accessibility (IAP Chapter 4),
- Decision making process to select trails to be part of an accessible trail network (IAP Chapter 5),
- Road and trail standards for accessibility (IAP Chapter 6), and a
- Communications strategy (IAP Chapter 7)

These changes, consistent with the policies set forth in the RTMP and Marin Countywide Plan⁶, are described in greater detail in the following sections.

The IAP would apply to all trails maintained by MCOSD. The BMPs as described in the RTMP would apply to these trails. The IAP would help implement the RTMP, and would be consistent with the RTMP.

Project Area

The “Project Area,” as defined by the Draft RTMP TPEIR (p. 4-12), was limited to the 34 MCOSD open space preserves. Four trails out of the 16 trails that have proposed accessibility improvements in the Inclusive Access Plan are not located within the MCOSD open space preserves. County parks or other public lands considered in the Addendum are indicated in **Figure 1**. Corresponding trails that are proposed for accessibility improvements are listed below the names for the MCOSD

⁶ **TRL-2.5: Provide Access for Persons with Disabilities.** Design and develop trail programs to enhance accessibility by persons with disabilities.

TRL-2.8: Provide Trail Information. Strive to provide information to users that facilitates visitor orientation, nature interpretation, code compliance, and trail etiquette. Develop a method for signing trails to assist users and emergency personnel.

TRL-2.e: Design Safe Trails. Design trails so that their surfaces, grades, cross gradients, sight distances, width, curve radii, vegetation clearance, and other specifications are consistent with anticipated uses.

TRL-2.h: Identify Access Opportunities for Persons with Disabilities. Review existing access opportunities for persons with disabilities. Identify and pursue new opportunities.

preserves, county parks, and other public lands. The county parks and other public lands that were not previously evaluated in the RTMP TPEIR include:

Agate Beach County Park
Greenbridge County Park
Hamilton Wetlands Preserve, owned by the California Coastal Conservancy
Whitehouse Pool County Park

For this Addendum, the 12 MCOSD preserves, three county parks, and one California Coastal Conservancy preserve included in the IAP are collectively referred to as the “modified project area” in order to address the collective IAP projects as one group. Although the MCOSD preserves were included in the RTMP, the 12 MCOSD preserves referenced only address impacts proposed under the IAP.

Policies

Expanded guidance pertaining to other power-driven mobility devices (OPDMDs), service animals, and seating are included in Chapter 4 of the IAP. The OPDMDs and service animal policy was included in the 2010 ADA update, and must be incorporated into Marin County Parks Policy. These policies will apply to all roads and trails owned and/or managed by the MCOSD.

Decision-Making Process

The RTMP's decision-making process pertains to existing roads and trails and whether they "should be maintained in their current location and footprint, or be rerouted, reconstructed, or decommissioned and restored" (RTMP p. 5-1).

The IAP expands on RTMP's framework and selects existing trails as candidates for accessibility improvements. The criteria for selecting trails to be a part of the IAP accessible network of trails places emphasis on feasibility and distribution throughout Marin County's ecological communities in order to represent the variety of recreational trail experiences in Marin County. These candidate trails were then designated as an Improved Access Trail or as an Access and Discovery Trail.

The Improved Access Trails and the Access and Discovery Trails are two components of the IAP that provide different levels of accessibility. Trails selected as an Improved Access Trail are "substantially accessible but do not fully meet all of the established accessibility standards for recreational trails," and will focus on enhanced trail communication strategies.⁷ Implementation of the communications strategy is intended to allow people with disabilities to make informed decisions on their ability to use the trail.⁸ These trails will be considered for future accessibility improvements as opportunities for development or redevelopment arise. Trails selected as an Access and Discovery Trail will include accessibility improvements to either parking, alternate means of arrival, trailhead(s), or trail conditions, in addition to implementing the communications strategy stated above.

Standards and Guidelines

The road and trail standards for the RTMP included a combination of design and engineering specifications adopted from the:

- County of Los Angeles Trail Manual
- Los Angeles County Department of Parks and Recreation 2011
- Road and Trail Design Specifications
- Midpeninsula Regional Open Space District 2013
- Handbook for Forest and Ranch Roads
- Mendocino County Resources Conservation District 1994

⁷ In Chapter 7 of the IAP, components of the Communication Strategies include: installation of trailhead signage, wayfinding methods (e.g. directional signage and progression markers), interpretive signage, website information updates, printed materials, and having an accessibility liaison available to answer questions for those who are not able to access information on the Web

⁸ Page 7-77 of the Draft IAP states that the "Independent Living Concept postulates that people with disabilities are best experts on their own needs. It is not appropriate for a public agency to determine if a person with a disability can or cannot use a particular trail. Instead, an individual should be empowered to make an informed decision about their trail selection based on information available to them."

The IAP incorporates additional design and engineering specifications from the:
Architectural Barriers Act Accessibility Guidelines for Outdoor Developed Areas (ABA)
2010 Americans with Disabilities Act Standards for Accessible Design (ADA)
2013 California Building Code

These new standards, as described in Chapter 6, apply to parking lots, alternate means of travel, trailhead, outdoor constructed features, and trail conditions for new trails with a pedestrian component or alteration of trails with a pedestrian component involving more than maintenance, where feasible. Examples of proposed accessibility modifications include:

- **Parking improvements:** modifications to existing parking spaces and facilities including striping or surface improvements in order to provide accessible parking spaces and accessible path of travel applying Americans with Disabilities Act (ADA) Accessibility Standards and the access standards contained in the California Building Code (accessibility) where appropriate.
- **Alternate means of travel:** coordinating with applicable agencies/jurisdictions to modify existing bus loading and unloading areas to be ADA compliant.
- **Trailhead accessibility improvements:** modifying the existing tread to ensure that access points are firm and level, have sufficient space to allow for pedestrians and other power driven mobility devices (OPDMDs) to maneuver through the access point, and have informational signs that indicate trail specifications (e.g. length of trail segment, surface type, typical/maximum running slope, typical/maximum tread width, and typical/maximum cross slope).
- **Trail conditions:** to allow for accessibility include modifying trail widths, adding drainage features, providing a five-foot-wide accessible portion along fire road alignments which may traverse the fire road from one side to the other, replacing loose trail materials with compacted materials, and creating resting intervals within steep trail segments, as appropriate.

Communications Strategy

While the MCOSD has existing protocols for communications, the RTMP did not include a written communications strategy.

The communications strategy in the IAP (Chapter 7) provide specifications relating to trailhead signs, informational exhibits and interpretive signage, websites, and written/graphic publications so that “trail information [is] available to the largest breadth of users” for the Access and Discovery Trails and the Improved Access Trails.

Trailhead signage would provide information to users regarding specific trail conditions, informational exhibits, and interpretive signage and would be installed within previously disturbed areas adjacent to existing signage. Any relevant BMPs from the RTMP would be incorporated for any new signs that are installed. For example, general BMPs would require sign installation to be

limited to areas that do not contain sensitive natural resources, minimization of sign installation construction footprint/impact, erosion minimization measures, reusing topsoil wherever feasible, and worker training (RTMP BMP IDs General-1 through General-9).

Incorporating trailhead signage and informational signage throughout the trail that provides information to users regarding specific trail conditions is consistent with Marin Countywide Plan Policy TRL-2.5: Provide Access for Persons with Disabilities, and TRL-2.8: Provide Trail Information. These Countywide Plan Policies govern Marin County Parks’ roads and trails and are incorporated into the RTMP. In addition, providing this signage is also consistent with policies in the MCOSD Policy Review Initiative, including Policy T2c⁹ and Policy VA2¹⁰, which are also incorporated into the RTMP.

This Addendum concludes that the IAP would not result in new significant environmental effects, consistent with the 2014 RTMP TPEIR. This is consistent with Section 15162(a) of the CEQA Guidelines.

Project Information

Lead Agency Name and Address

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Table 1. General Plan Land Use and Zoning Designations for Proposed Modified Project Area Improvements

Public Land Name	Trail(s)	Location	General Plan	Zoning
Agate Beach County Park*	Agate Beach Bluff Trail ¹	Unincorporated Marin County	Open Space with coastal overlay (C-OS)	Open Area with coastal overlay (C-OA)
Camino Alto OSP	Escalon Fire Road ²	City of Mill Valley	Open Space (OS)	Open Area (OA)
Deer Island OSP	Deer Island Loop Trail ²	City of Novato	Open Space (OS)	Open Space: Baylands: Flood Hazard or Regulation District 2 (OS:B:F2), with “Publicly Owned Open Space Lands” overlay

⁹ Policy T2c: The MCOSD will strive to provide information, including signs, to trail users that facilitate visitor orientation, nature interpretation, code compliance, and proper trail etiquette.

¹⁰ Policy VA2: The MCOSD may provide visitor amenities such as (a) informational displays and signs; (b) portable restrooms in areas where group use is seasonally frequent; (c) facilities for watering and tying equines; and (d) bicycle racks.

Public Land Name	Trail(s)	Location	General Plan	Zoning
Greenbridge County Park*	Greenbridge Trail ²	Unincorporated Marin County	Open Space with coastal overlay (C-OS)	Agriculture Production zone 60 Acres with coastal overlay (C-APZ-60) and Open Area with coastal overlay (C-OA)
Hamilton Wetland Preserves*	Hamilton Path ¹	City of Novato	Open Space (OS)	Planned District with Bayland overlay (PD:B), publicly owned open space lands
Indian Valley OSP	Indian Valley Fire Road ¹	Unincorporated Marin County	Open Space (OS)	Open Area (OA)
Old St. Hilary's OSP	Vistazo Fire Road ^{1,2}	Town of Tiburon	Open Space (OS)	Open Space (OS)
Ring Mountain OSP	Taylor Fire Road ²	Unincorporated Marin County	Open Space (OS)	Open Area (OA)
Roy's Redwoods OSP	Roy's Redwoods Meadow Trail ¹	Unincorporated Marin County	Open Space (OS)	Open Area (OA)
Rush Creek OSP	Bahia Trail ² , Pinheiro Fire Road ² , Rush Creek Fire Road ¹	City of Novato	Conservation (CON) at southern trail segment; Open Space (OS) at northern trail segment	Planned District (PD) at southern trail segment; Open Space (OS) at northern trail segment and publicly owned open space lands
Santa Margarita OSP	Santa Margarita Island Trail ²	Unincorporated Marin County	Multi-Family (MF3)	Residential Multiple Planned (BFC-RMP-5.62)
Santa Venetia OSP	Santa Venetia Marsh Trail ²	Unincorporated Marin County	Single Family (SF6)	Residential Single Family Planned (BFC-RSP-5.8) with coastal overlay
Terra Linda/Sleepy Hollow OSP	Ridgewood Fire Road ²	Cities of San Rafael and San Anselmo, Unincorporated Marin County	OS ³ , Parks/Open Space (P/OS) ⁴ , OS ⁵	P/OS ³ , Public Facilities (PF) ⁴ , OA ⁵
Whitehouse Pool County Park*	Whitehouse Pool Trail ¹	Unincorporated Marin County	Open Space with coastal overlay (C-OS)	C-OA (Open Area with coastal overlay)
Notes: OSP – Open Space Preserves GGNRA – Golden Gate National Recreation Area * Part of the modified project area 1 - Access and Discovery Trails 2 - Improved Access Trails 3 - City of San Rafael 4 - City of San Anselmo 5 - Marin County				

Surrounding Land Uses and Setting

The project sites are located throughout Marin County. Marin County is one of nine counties that surround the San Francisco Bay Estuary. Land uses surrounding the various preserves, county parks, and other public lands include other public conservation lands, agricultural lands, private residences, private undeveloped land, and commercial/mixed uses. The trail locations correspond roughly with ecological communities that can be found in the San Francisco Bay area. For example, Agate Beach County Park is located along the coast and offers hikers access to the beach and to the Duxbury Reef State Marine Conservation Area, where there are opportunities to view tide pools. Estuarine marsh habitats found at Hamilton Wetlands Preserve and Rush Creek Open Space Preserve allow hikers to view multiple species of migratory birds resting and foraging. The trail at Indian Valley Open Space Preserve winds through coast live oak and California bay woodlands, as

well as grassland habitats. Roy's Redwoods Open Space Preserve showcases old-growth coast redwood forests and wet meadows. The trail at Whitehouse Pool County park runs parallel to Lagunitas creek, where trail users can see tidally-influenced riverine habitat. The trail at Old St. Hilary's Open Space Preserve gives hikers a chance to see serpentine grassland habitat, which is home to rare and endangered plant species endemic to California, as well as panoramic bay views.

Project Description

The IAP is a supplement to the RTMP to guide the accessibility component of future trail planning efforts. The IAP identified multiple candidate trails for accessibility improvement based on standards for geographic distribution, creation of a diverse set of experiences within the system, and natural resource stewardship considerations.

Trail design standards related to accessibility that are identified in the IAP, apply to parking lots, alternate means of travel, trailhead, outdoor constructed features, and trail conditions for new trails with a pedestrian component or alteration of trails with a pedestrian component involving more than maintenance, where feasible. Whether or not these trail standards are applied to a future trail project will be determined using the decision-making protocol identified in Chapter 5 of the IAP. If the application of the trail design standards are deemed appropriate for a future trail project, the trail will be classified as belonging to either the Access and Discovery Trail system, or the Improved Access Trail system.

The IAP identified an initial set of Access and Discovery Trails, and contains design and engineering specifications, and diagrams for each trail. Detailed improvement plans for each site can be found in the Inclusive Access Plan - Appendix B: Access and Discovery Trails Improvement Plan. Site-specific descriptions of trail accessibility additions and/or modifications are in the following sections. The proposed modifications to the Access and Discovery Trails integrate the design and engineering standards specified in the RTMP. In addition, all work to achieve these standards will be conducted in conformance with BMPs described in the RTMP. The combination of policies, design and engineering standards, and conformance with BMPs will ensure that the roads and trails will be sustainable with routine maintenance and will minimize resource impacts.

Consistent with the RTMP BMPs, construction equipment ingress/egress routes for the IAP would take place along existing roadways and paths, and staging areas will be confined to areas of existing disturbance, such as a current road or trail alignment whenever feasible. The timing of the construction would be during the dry season and would avoid sensitive species' breeding and nesting seasons, as outlined in the RTMP and listed in the Biological Resources section of this document. Table 4.3, Suggested Seasonal Restrictions for Maintenance Activities Near Special Status Species of the MCOSD Vegetation and Biodiversity Management Plan (VBMP, pp. 4-27 through pp. 4-28) also provides specific seasonal restrictions and measures to avoid impacts to special status species and habitats Note, the VBMP is pending adoption and is not currently official policy of the department.).

Currently, the Improved Access Trails do not have site-specific designs for implementing the communications strategy (specifically, signage installation); however, Marin County has uniformly applicable standards for sign installation to ensure that signs would not impact surrounding resources, and would be ADA-compliant. The communications strategy would also implement BMPs listed in the RTMP, where applicable. Furthermore, the communications strategy helps implement and would be consistent with the RTMP and the 2007 Marin Countywide Plan.

Collectively, trail accessibility improvements for the IAP are referred to throughout this Addendum as the “proposed project.” The preserves, county parks and other public lands that contain these trails are referred to as the “modified project area.”

Agate Bluff Beach Trail

Parking: no changes

Alternate means of arrival: no changes

Trail head: install stabilized decomposed granite at the interface between the trail surface and the concrete paving to eliminate the vertical change in elevation and to minimize needed maintenance.

Trail conditions: Make minor repairs to the existing decomposed granite surface, construct drainage structures, and provide a resting intervals halfway down the Access and Discovery Trail. The trail beyond the memorial bench will be treated as an Improved Access Trail with expanded conditions information being made available. There are two options for the remaining trail: wood tie stairs or cable-tied logs. No trail improvements to the bluff trail are proposed.

Hamilton Path

Parking: provide one van accessible parking space at the pedestrian ramp leading to the trail access gate in the central section of the trail.

Alternate means of arrival: no changes

Trailhead: modify the trail surfaces by installing decomposed granite surfacing or similar firm and stable surfacing.

Trail conditions: replace road base material with compacted decomposed granite or similar firm and stable surfacing in 4 locations.

Indian Valley Fire Road

Parking: re-configure the entrance gate at the Indian Valley Road entrance to provide an accessible parking option.

Alternate means of arrival: no changes

Trailhead: installation of trailhead signs at both the north and south entrances with information about trail conditions. Reconfigure the control fencing at the Indian Valley Road entrance in order to provide accessible parking options. A vehicular access gate for maintenance and emergency vehicles will also be relocated at this entrance.

Trail conditions: Due to the existing width of the existing trail/fire road, only a portion of the width is recommended to be modified. Because of the width of the fire road and the extent of the existing cross slope, the designated accessible path will alternate from side to side to reduce the need for massive regrading. Accessible connections to the existing side trails will be made. Drainage improvements including the construction of gentle drain dips are recommended to control run off from adjacent slopes.

Roy’s Redwoods Meadow Trail

Parking: replace road base materials with firm and stable surface nearest the accessible entrance to the trailhead.

Alternate means of arrival: no changes

Trailhead: reconstruct pedestrian entrance to provide a path of travel consistent with the standards contained in the Outdoor Developed Area Guidelines of the Architectural

Barriers Act (ABA). Lengthening the trail and inclusion of a resting interval will facilitate pedestrian access. In order to provide compliant slopes at the trail entrance, it may be necessary to construct a retaining wall/barrier at the roadway edge to facilitate a longer path of travel with resting intervals.

Trail conditions: Minor grading and surface improvements to the meadow trail are recommended. No trail surface improvements are recommended for the redwood grove at the end of the Meadow trail. An alternative pedestrian entry route with a gentler slope is possible starting further south on Nicasio Valley Road, parallel to the creek, and passing the portable toilet. Any proposed improvements to the Meadow trail will be coordinated with ongoing meadow restoration efforts.

Rush Creek Fire Road

Parking: Provide an accessible area with a single accessible stall including access aisle at the Bugeia Lane entrance and two paved parking spaces not designated for accessibility. Grading and construction of a retaining wall will be required to create a level parking area.

Alternate means of arrival: no changes

Trail head: provide an accessible surface connecting the accessible parking space and the trail/fire road.

Trail conditions: remove sections of loose surface materials and replace with firm and stable compacted surfacing. Install edge protection at the steep slope immediately south of the pedestrian bridges. Modify the trail section between the bridges to provide a more level connection. Provide resting intervals at several locations where the trail has steeper sections. Consider providing a resting place with seating at a shady spot along the trail alignment.

Vistazo Fire Road

Parking: install blue curb and accessible signage at the southern trailhead. The specific location of the blue curb and pole mounted sign is to be determined to minimize visual impact from the adjacent property.

Alternate means of arrival: no changes

Trailhead: minor regrading/surfacing improvements at the entry pathways at both ends of the trail.

Trail conditions: Surface improvements to the trail alignment will be limited to the first 300 linear feet of the road from the south entrance. Improvements include modifying surface as needed to create a 5-foot wide accessible path within the existing road alignment to allow drainage. The remainder of the fire road will be treated as an Improved Access Trail with expanded conditions information being made available regarding wet season conditions and uneven/rocky areas. The County will explore additional environmental improvements to the trail alignment, including fencing along the existing alignment to limit social trails.

Whitehouse Pool Trail

Parking: regrade a portion of the parking lot closest to the trail head; add markings, striping, signage, and an access aisle. Install wheel stops and accessible 48-inch minimum wide path to the existing portable toilets.

Alternate means of arrival: A bus loading/unloading platform could be provided at the existing bus stop. Any improvements to the bus stop will need to be accomplished through

coordination between Marin County Parks, Marin Transit, and any other agencies having jurisdiction.

Trail head: provide a section of stabilized decomposed granite paving or other firm and stable surfacing at the pavements/trail transition to prevent vertical changes in elevation caused by erosion and wear.

Trail conditions: improvements to pedestrian bridge near the parking area (modifying the slope of the approach ramp, installing safety railing to the wooden bridge ramp); widening trail head; and providing accessible trail surfacing to selected benches at the bank of the creek. A section of boardwalk is also recommended to address reduced trail width along the riparian clearing.

Evaluation of Environmental Impacts

- (1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- (2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- (3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- (4) "Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as explained in [5] below, may be cross-referenced).

It is noted that many potential environmental impacts can be avoided or reduced through implementation of uniformly applied trail policies, standards, or regulations – such as best management practices (BMPs), county-wide policies, permitting requirements, design guidelines, a noise ordinance, a historic resource ordinance, and other requirements that the lead agency applies uniformly toward all project proposals. Consistent with CEQA streamlining provisions (e.g., Section 15183), these uniformly applied requirements are not distinguished as project-specific “mitigation measures,” primarily because they have already been adopted to avoid or reduce potential environmental impacts of all future project proposals, not only the particular project being evaluated at the moment.

- (5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. (CEQA Guidelines Section 15063[b][1][c]). In this case, a brief discussion should identify the following:
 - (a) Earlier Analysis Used. Identify and state where they are available for review.
 - (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

- (c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- (6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- (7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- (8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- (9) The explanation of each issue should identify:
 - (a) The significance criteria or threshold, if any, used to evaluate each question; and
 - (b) The mitigation measure identified, if any, to reduce the impact to less than significant.

Current Project Relationship to RTMP TPEIR

Aesthetics

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Have a substantial adverse effect on a scenic vista?			X	N/A
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	N/A
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	N/A
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ("Glare" is defined in this EIR as the reflection of harsh bright light sufficient to cause physical discomfort or loss in visual performance and visibility.)			X	N/A

Conclusion: Regarding aesthetics, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. & c. The RTMP TPEIR (p. 14-4) concluded that the implementation of the project includes maintenance and construction actions that would have the potential to modify the view of current rural residents immediately adjacent to an open space preserve. The view would appear consistent in scale and appearance with other existing rural land uses. The changed view would appear appropriate to most viewers, and would not substantially degrade a scenic vista or visual quality. Therefore, the RTMP would result in a less than significant impact, and no mitigation would be necessary. The proposed project does not propose actions that would substantially modify the view of residents who live adjacent to the trails within the modified project area. Since the proposed project is in compliance with all applicable RTMP standards, the project is not expected to create or substantially worsen impacts previously identified in the RTMP TPEIR. Therefore, the proposed project would continue to have less than significant impacts, consistent with the determination from the RTMP TPEIR.
- b. No state or locally designated scenic highways are located within Marin County (Caltrans 2016). The modified project area would still remain within Marin County boundaries. Therefore, implementation of the proposed project would not adversely affect scenic resources within a designated scenic highway or road corridor. The proposed project would continue to have no impact, consistent with the determination from the RTMP TPEIR.

- d. As undeveloped open space, the MCOSD preserves do not contain any existing lighting, except for aircraft hazard and security lighting associated with utility and communications facilities developed within the preserves. The county parks and other public spaces within the modified project area do not contain existing lighting. Implementation of the proposed project would not introduce any new source of light or glare within the modified project area. No aspect of implementing the proposed project would modify or increase lighting associated with aircraft hazard or utility security lighting. Because implementation of the proposed project would not include any lighted feature or new source of lighting, there would be no impact, and no mitigation would be necessary. The proposed project would have no impact to light, consistent with the determination from the RTMP TPEIR.

Agriculture Resources

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	N/A
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	N/A
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51140 (g))?			X	N/A
d) Result in the loss of forest land or conversion of forest land to non-forest use?			X	N/A
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	N/A

Conclusion: Regarding agricultural resources, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- b. & e. The RTMP TPEIR (pp. 14-5 to 14-6) concluded that “only minor amounts of important farmlands are mapped within the MCOSD system. Although minor amounts of important farmlands, lands protected by Williamson Act contracts, and existing agricultural uses are

located within the preserves, no program, policy, standard, or BMP set forth in the RTMP would interfere with the continuation of these existing agricultural uses. This impact would be less than significant, and no mitigation would be necessary.” The modified project area does not contain important farmlands. The policies, decision-making process, standards/guidelines, and communications strategy proposed in the IAP would not interfere with existing agricultural uses. Therefore, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts and would continue to have no impact to agricultural resources, consistent with the RTMP TPEIR.

- d. & e. None of the preserves, county parks, or public lands within the modified project area are zoned for forest land, timberland, or Timberland Production. No timber management activities occur within the modified project area and there is no designated commercial forest land within the modified project area. Because no important commercial timberlands or forest resources exist within the modified project area, there would be no loss or conversion of timberland or forest lands to other uses. The proposed project would continue to have no impact, consistent with the determination from the RTMP TPEIR.

Air Quality

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Conflict with or obstruct implementation of the applicable air quality plan?		X		Air Quality-1
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		X		Air Quality-1 through -4
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, including releasing emissions that exceed quantitative threshold for ozone precursors?		X		Air Quality-1 through -4
d) Expose sensitive receptors to substantial pollutant concentrations, including, but not limited to, substantial levels of toxic air contaminants?			X	N/A
e) Create objectionable odors affecting a substantial number of people?			X	N/A

Conclusion: Regarding air quality, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. The RTMP TPEIR (pp. 5-11 through 5-13) concluded that “development in conformance with RTMP standards and BMPs has the potential to conflict with or obstruct implementation of Bay Area Air Quality Management District (BAAQMD) air quality plans. Because the RTMP adopts all appropriate measures contained within the BAAQMD’s Bay Area Clean Air Plan, this impact would be less than significant.” The proposed project is not expected to increase population or visitors within the modified project area; the IAP would manage long-term use of the roads and trails in the within the modified project area with the intention of enhancing accessibility for residents and visitors. RTMP-related projects’ criteria air emissions are not expected to exceed thresholds, and the project would comply with applicable BMPs of the BAAQMD as described in the TPEIR (pp. 5-11 through 5-13) and include all feasible control measures included in the Air Quality Plan. In addition, Policy SW.29 directs the MCOSED to “pursue funding to retrofit the existing construction equipment engines with diesel particulate filters or upgrade to equipment with electric, Tier III, or Tier IV off-road engines” in addition to renting “construction equipment that meet these criteria, if available.” This policy is consistent with the 2010 Clean Air Plan strategy to reduce emissions from mobile sources, Mobile Source Measures (MSM) C-1 for Construction and Farming Equipment. The proposed project is in compliance with all applicable RTMP standards and BMPs, and as a result, impacts to air quality would continue to be less than significant, consistent with the RTMP TPEIR.
- b. & c. The RTMP TPEIR (pp. 5-14 through 5-18) concluded that development in conformance with RTMP standards and BMPs has the potential to generate short-term, temporary air emissions during construction, and long-term indirect emissions from on-road vehicles during operation. These emissions would not, however, represent an increase over existing conditions. Requirements of the BAAQMD have been incorporated into BMPs in the RTMP. Compliance with the RTMP policies and BMPs cited in Table 5-4 of the RTMP TPEIR, combined with the Air Resource Board’s (ARB) construction equipment exhaust standards, would ensure that short-term construction emissions generated by continued RTMP trail construction activities would be minimized to the maximum extent feasible. Since the project would not result in an increase in emissions, and BAAQMD requirements have been incorporated into the RTMP, this impact would be less than significant. The proposed project is in compliance with all applicable RTMP standards and BMPs, and as a result, no additional criteria air quality pollutant impacts are anticipated. The proposed project’s impacts will continue to be less than significant, consistent with the RTMP TPEIR.
- d. The RTMP TPEIR (p. 5-11) concluded that development in conformance with RTMP standards and BMPs would not result in a long-term increase in the use of TAC-containing products (fuels, maintenance products), nor would the project introduce sensitive receptors to existing TAC sources. Even though the distance to nearest residences, schools, and medical facilities (sensitive receptors) varies throughout the Marin County Parks road and trail system, cancer risk associated with diesel exhaust exposure is typically associated with chronic exposure, and would be considered less than significant during construction since the exposure would be temporary and no one location would be exposed to continuous construction emissions. There would be no operational emissions of TACs as a result of the proposed project. The proposed project is in compliance with all applicable RTMP standards and BMPs, and as a result, no additional increase in TACs are anticipated, nor will this project expose sensitive receptors to substantial pollutant concentrations. The proposed project’s impacts will continue to have no impact, consistent with the RTMP TPEIR.
- e. The RTMP TPEIR (p. 5-11) concluded that although diesel exhaust from construction activities may generate odors, the level of overall emissions would be low, and the duration

of emissions would be temporary. Further, the proposed project would not change the amount or frequency of the generation of odors from either construction or operation, and there would be no increase in objectionable odors. The proposed project is in compliance with all applicable RTMP standards and BMPs, and as a result, no additional increase in objectionable odors are anticipated. The proposed project's impacts will continue to have no impact, consistent with the RTMP TPEIR.

Biological Resources

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		General-1 through -11; Sensitive Natural Resources-1; Special-status Wildlife-1 through -13; Special status plants-1 through -12; Invasive plants-4, -5, -6, and -7; Construction contracts-1 and -2
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		General-1 through -11; Sensitive Natural Resources-1; Special-status wildlife-1, -4, -6, -7, -8, -11, and -12; Special-status plants-1 through -9 Construction Contracts-1 and -2; Water Quality-1, -2, -3, -4, -6, -8, and -9;
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through		X		Construction Contracts-1 and -2; Water Quality-1, -2,

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
direct removal, filling, hydrological interruption, or other means?				-3, -4, -6, -8, and -9
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		Construction Contracts-1 and -2; Water Quality-1, -2, -3, -4, -6, -8, and -9
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	N/A
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	N/A

Conclusion: Regarding biological resources, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. The RTMP TPEIR (pp. 6-29 through 6-50) concluded that maintenance of existing facilities has the potential to adversely affect sensitive wildlife and plant species or their habitats located within or adjacent to a work area. With the implementation of the policies, procedures, and BMPs identified in the Marin Countywide Plan and the RTMP, this impact would be less than significant because all construction activities would require preconstruction surveys, seasonal restrictions during the wet and bird nesting seasons, worker awareness training, construction monitoring, avoidance and protection of identified sensitive jurisdictional resources, sensitive communities and special status species, and relocation of these species, if needed. In addition, a Biological Resources Assessment was conducted for the proposed trail improvement projects within the modified project area. This report included site reconnaissance for the proposed project locations, evaluated potential for special status species to be present at the proposed project sites, and evaluated the potential for the proposed project activities to impact the special status species that either had a moderate or high potential to be present, or were present at the project sites. The Biological Resources Assessment (pp. 60 through 65) concluded that the proposed project, in conformance with the standards and BMPs outlined in the RTMP, would not have a substantial adverse impact, either directly or through habitat modifications, for the special status species found within the modified project area. Impacts from the proposed project would remain less than significant, consistent with the determination from the RTMP TPEIR.
- b. The RTMP TPEIR (pp. 6-51 through 6-52) concluded that maintenance of existing facilities has the potential to adversely affect riparian habitat or other sensitive natural communities located within or adjacent to a work area. With the implementation of the policies, procedures,

and BMPs identified in the Marin Countywide Plan and the RTMP, this impact would be less than significant because the proposed project would avoid sensitive habitats, schedule construction work during the dry season, prepare a hazardous spill plan, consult with appropriate state and federal agencies, and implement soil erosion and sediment control methods as necessary. The Biological Resources Assessment (p. 65) determined that of the sensitive natural communities present within the open space preserves, two are located adjacent to proposed trail improvements; coastal brackish marsh at Rush Creek Fire Road and serpentine bunchgrass at Vistazo Fire Road. The Assessment concluded that the proposed project is in conformance with the standards and BMPs set forth in the RTMP; therefore, construction impacts would continue to be less than significant, consistent with the determination from the RTMP TPEIR.

- c. The RTMP TPEIR (pp. 6-52 through 6-58) concluded that maintenance of existing facilities has the potential to adversely affect jurisdictional wetlands or regulated waters located within or adjacent to a work area. With the implementation of the policies, procedures, and BMPs identified in the Marin Countywide Plan and the RTMP, this impact would be less than significant. The Biological Resources Assessment (p. 68) determined that jurisdictional wetlands or regulated waters are present within all of the proposed project sites. Potential direct and indirect impacts from construction include sedimentation, accidental spill or release of hazardous materials, inadvertent damage by construction equipment, or decreased water quality due to runoff. Construction staging areas and egress/ingress routes for the proposed project would be limited to areas that are already developed/disturbed, and would be located away from sensitive jurisdictional wetlands or regulated waters whenever possible. In addition, the proposed project would follow applicable BMPs set forth in the RTMP that were specifically intended to avoid impacts to water bodies. Since segments of the trail at Roy's Redwoods Open Space Preserve and Whitehouse Pool County Park have improvements that will take place within 100 feet of creeks or intermittent streams, these activities would have BMPs like seasonal or tidal restrictions, implement sediment/erosion control measures like installing linear sediment barriers made out of natural fibers (i.e. no plastic), immediately revegetating disturbed area with native plants, and avoid sidecasting materials when there is a potential that these materials could reach surface waters. The proposed project would implement all necessary standards and BMPs set forth in the RTMP; therefore, construction impacts to jurisdictional waters would be continue to be less than significant, consistent with the determination from the RTMP TPEIR.
- d. The RTMP TPEIR (pp. 6-58 through 6-60) concluded that maintenance of existing facilities has potential to adversely affect wildlife movement, migratory corridors, or nursery sites located within or adjacent to a work area. With the implementation of the policies, procedures, and BMPs identified in the Marin Countywide Plan and the RTMP, this impact would be less than significant because the proposed project would avoid sensitive habitats, schedule construction work during the dry season, schedule construction work to avoid nesting season, conduct preconstruction surveys, prepare a hazardous spill plan, consult with appropriate state and federal agencies, and implement erosion/sediment control methods as needed. The Biological Resources Assessment (p. 68) determined that there are a number of wildlife corridors within the project sites, including, but not limited to: Tomales Bay, San Pablo Bay, Lagunitas Creek, Rush Creek, and other intermittent creeks that run through the project sites. These wildlife corridors provide valuable habitat for a number of migratory species. Since the proposed project would implement all necessary standards and BMPs set forth in the RTMP, which was specifically developed to protect sensitive habitats and species, construction

impacts would be continue to be less than significant, consistent with the determination from the RTMP TPEIR.

- e. The RTMP EIR (pp. 6-58 through 6-60) concluded that maintenance of existing facilities has potential to conflict with local policies and ordinances to protect biological resources. With the implementation of the policies, procedures, and BMPs identified in the Marin Countywide Plan and the RTMP, this impact would be less than significant. The RTMP incorporates all applicable policies and protection measures of relevant local policies and ordinances, including the Marin Countywide Plan, the MCOSD Strategic Plan, and the County of Marin tree ordinance. As a result, no significant conflicts with applicable local policies or ordinances would result from implementing the IAP. The proposed project was developed in conformance with the RTMP and does not conflict with any local policies or ordinances protecting biological resources. See (a) through (d) above for examples of BMPs that will be incorporated into the project. The proposed project would continue to have less than significant impact with local policies protecting biological resources, consistent with the determination from the RTMP TPEIR.
- f. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the modified project sites. The proposed project would continue to result in no impact related to habitat conservation plans, consistent with the determination from the RTMP TPEIR.

Cultural Resources

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?		X		Cultural Resources - 6
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines §15064.5?		X		Cultural Resources - 6
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	N/A
d) Disturb any human remains, including those interred outside of formal cemeteries?		X		Cultural Resources – 6, 7

Conclusion: Regarding cultural resources, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a., b., & d. The RTMP TPEIR (p. 7-5) indicated that there have been cultural resource investigations conducted on or adjacent to most of the MCOSD preserves. A records search

conducted by the Northwest Information Center (NWIC) for the RTMP TPEIR indicates that 60 previously recorded resources exist within 11 of the 34 sites of the MCOSD preserve system. Some of these resources exhibit prehistoric archaeological features and historic features. The RTMP TPEIR (p. 7-11 through 7-15) concluded that construction of new roads or trails, the maintenance of existing facilities, or changes in use with the RTMP has the potential to lead to substantial adverse changes in the significance of historical or cultural resources, or to an encounter of human remains within and adjacent to the MCOSD's open space preserves. The RTMP contains systemwide policies and BMPs consistent with federal, state, and local regulations to protect cultural resources, historical resources, and human remains from the potentially adverse effects of construction and management activities on known and unknown cultural sites within open space preserves and trails managed by the Marin County Parks. For example, if cultural resources are discovered on a project site during construction or maintenance activities, all earthmoving activity would be halted until a qualified archaeologist examined the findings, assessed the significance, and developed proposals for any procedures deemed appropriate to further investigate and/or mitigate adverse impacts to these resources. In the event that human remains are discovered during construction/maintenance work, work in the area would be discontinued while the County Coroner is contacted and informed of the discovery. If skeletal remains are found to be prehistoric Native American remains, the coroner will call the Native American Heritage Commission within 24 hours. The commission will identify the person(s) it believes to be the most likely descendant of the deceased Native American. The most likely descendant will be responsible for recommending the disposition and treatment of the remains. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation/grading work for means of treating or disposing of the human remains and any associated grave goods as provided in Section 5097.98 of the California Public Resources Code. With implementation of RTMP system wide policies and BMPs, no adverse effects would result, the impact would be less than significant, and no mitigation would be necessary. The construction staging areas and construction activities for the proposed project would take place in existing parking lots, roads, and trails, further reducing the likelihood that documented or undocumented cultural resources would be subject to adverse change. BMP Cultural Resources-1 through -3 states that resource mapping, records search from the NWIC, and tribal consultation is needed if there will be ground disturbance outside of road and trail beds; since the proposed project's construction activities take place within road and trail beds, a records search and tribal consultation is not needed for this project. All project activities that would result in ground disturbance are limited to parking lot, road, and trail regrading and/or resurfacing, and sign installation. The proposed project was developed in conformance with the RTMP and would not result in new significant environmental impacts identified in the RTMP TPEIR. The proposed project would continue to have less than significant impacts, consistent with the RTMP TPEIR.

- c. The RTMP TPEIR (p. 7-16) concluded that the RTMP would lead to construction activities such as grading and sub-surface excavation during road and trail maintenance, that could cause the degradation or loss of paleontological resources or unique geologic features. Potential impacts to these resources would be less than significant because all geological resources within preserves are already protected within permanently protected designated open space or parks, and there are no fossil sites within Marin County. The proposed project is in compliance with all applicable RTMP standards and BMPs, and as a result, no new impact or additional increase in an already identified impacts on a unique paleontological resource/site or unique geologic feature is anticipated. The proposed project would continue to have less than significant impacts, consistent with the RTMP TPEIR.

Geology and Soils

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: The project would not create new geologic hazards that could damage project or nearby facilities. Therefore, this section focuses on the effect of local geologic conditions and activity on the proposed project.				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Division of Mines and Geology Special Publication 42)?			X	N/A
ii) Strong seismic ground shaking?			X	N/A
iii) Seismic-related ground failure, including liquefaction?		X		Geologic Hazards - 4
iv) Landslides?		X		Geologic Hazards - 2
b) Result in substantial soil erosion or the loss of topsoil?		X		General - 3, 5; Water Quality -1, 2, 3, 6
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?		X		Geologic Hazard - 3 and 4
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?		X		Geologic Hazard -1, 2, 3, and 4
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			X	N/A

Conclusion: Regarding geology and soils, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. Marin County is located within the seismically active San Francisco Bay Area. The significant earthquakes that occur in the Bay Area are generally associated with crustal movement along well-defined, active fault zones of the San Andreas Fault system, which trends in a northwesterly direction. Greenbridge and Whitehouse Pool County Parks are located on the San Andreas fault, within the Alquist-Priolo Fault Zone. While the Agate Beach Bluff Trail is approximately 1.25 miles from the San Andreas fault, it is not located directly within the Alquist-Priolo Fault Zone. A 72 percent likelihood of fault rupture with a magnitude of 6.7 or greater has been forecasted to occur on one of the San Francisco Bay Area active faults, including the San Andreas fault, before the year 2042 (USGS 2015). Site-specific information regarding seismic hazards is listed in the table below.

Table 2. Seismic Hazards within the Modified Project Area

IAP Trail Locations	i) Alquist-Priolo Zone?	ii) Shaking Severity	iii) Liquefaction susceptibility	iv) Landslide
Agate Beach County Park**	No	Violent – MMI 9	n/a*	n/a*
Camino Alto OSP	No	Violent and very strong – MMI 9 and 8, respectively	Low/very low	PDFS, Mostly/Many Landslides
Deer Island OSP	No	Very strong – MMI 8	Low/very low	PDFS, Mostly/Many Landslides
Greenbridge County Park**	Yes	Very violent and violent, MMI 10 and 9, respectively	Very high	n/a*
Hamilton Wetlands Preserve**	No	Violent – MMI 9	Very high	n/a*
Indian Valley OSP	No	Very strong – MMI 8	Very high/high	PDFS, Mostly/Many Landslides
Old St. Hilary’s OSP	No	Very strong – MMI 8	n/a*	PDFS, Many Landslides
Ring Mountain OSP	No	Very strong – MMI 8	Low/very low	n/a*
Roy’s Redwoods OSP	No	Very strong – MMI 8	Low/very low	PDFS, Mostly/Many Landslides
Rush Creek OSP	No	Violent and very strong, MMI 9 and 8, respectively	Moderate	PDFS, Mostly/Many Landslides
Santa Margarita Island OSP	No	Very strong – MMI 8	Low/very low	n/a*
Santa Venetia OSP	No	Very strong – MMI 8	n/a*	n/a*
Terra Linda/Sleepy Hollow Divide OSP	No	Very strong – MMI 8	Low/very low	PDFS, Mostly/Many Landslides
Whitehouse Pool County Park**	Yes	Violent – MMI 9	Very high	n/a*

Source: Association of Bay Area Governments

IAP Trail Locations	i) Alquist-Priolo Zone?	ii) Shaking Severity	iii) Liquefaction susceptibility	iv) Landslide
PDFS – potential debris flow source * data not available because area has not yet been evaluated, or there is mapping planned or in progress. ** County parks or public lands that were not previously evaluated in the RTMP TPEIR				

The RTMP TPEIR (p. 8-13) concluded that existing and future trails within the MCOSD preserves has potential to fail or be exposed to seismic related hazards from earthquakes. High intensity ground shaking during an earthquake on a local or regional fault could expose the MCOSD roads and trails to strong ground shaking, potentially leading to ground or slope failure and damage to the MCOSD facilities. The risk to recreationists from failure or damage of the MCOSD roads and trails would be considered to be a low magnitude hazard since no occupied structures would be involved and the number and density of persons at any given time using the MCOSD facilities that could be adversely affected is low. The risk of injury or death for a substantial number of people using the MCOSD facilities during an earthquake would be much lower than for that of an urban area within Marin County. Because the RTMP includes policies and BMPs to ensure that the location and type of any existing or new road or trail would be evaluated, selected, and designed to minimize any risks from strong ground shaking, liquefaction, or landslides that may result from earthquakes or fault ruptures, this impact would be less than significant. Impacts to county parks and other public lands outside the MCOSD preserves would be similar. Since the proposed project was developed in conformance with the design specifications, applicable policies, and BMPs in the RTMP, no new impact or additional increase in an already identified impact for geologic hazard is anticipated; impacts would remain less than significant, consistent with the RTMP TPEIR.

- b. The RTMP TPEIR (p. 8-19) concluded that exposed soils on trails and roads is subject to ongoing erosion. One of the proposed project’s objectives is to repair and improve the trails that have become eroded as a result of improper design and/or normal wear and tear from road and trail users. Although it will not be possible to completely prevent erosion on exposed road and trail surfaces within the Marin County Parks’ trail network, the proposed project will reduce the rate of erosion by implementing widely accepted design standards like:
 - a. Correcting the drainage patterns on and near trails by installing water bars or drain dips to divert water from the trail;
 - b. Compacting loose material to stabilize trail and prevent loss of topsoil
 - c. If the subsurface soils have insufficient strength and cohesion to provide a stable base for the aggregate, then a layer of non-woven geotextile fabric may be applied to the prepared area prior to the installation of aggregate paving.

BMPs in the RTMP were developed specifically to avoid erosion impacts. These BMPs include, but are not limited to: conducting maintenance construction work only during dry periods, recontouring impacted areas soils to natural topography as needed, maintain erosion or sediment control devices during ground disturbance activities, and avoid the use of heavy equipment in areas with soils that are disturbed, saturated, or subject to extensive compaction (RTMP, Table 6.1, General – 3 and – 5, p. 6-17; Table 6.8, Water Quality -1, -2, -3, -6, p. 6-33).

The RTMP was developed to be consistent with federal, state, and county requirements to avoid and minimize erosion hazards. Since the proposed project was developed in conformance with the design specifications and BMPs of the RTMP, the project would not result in any new significant environmental impacts or substantially increase in the severity

of previously identified significant impacts in the TPEIR; impacts from this project would continue to be less than significant, consistent with the RTMP TPEIR.

- c. The RTMP TPEIR (p. 8-15) concluded that maintenance of roads and trails could take place on or near areas subject to slope instabilities or landslides. Hamilton Path, Indian Valley Fire Road, and Rush Creek Fire Road are located in areas that are moderately to very highly susceptible to liquefaction and landslides (see table in section (a)). Landslides and other related slope-stability hazards are likely the main geologic hazards for MCOSD preserves, county parks, other public lands, and trail infrastructure. Hazards might occur as a result of strong seismic shaking, or more commonly, during intense rainfall events that quickly saturate the soil. The proposed project incorporates trail design and engineering specifications that are unique to the terrain and geologic hazards at each site. For example, improvements to trails that are located in areas with high landslide risk like Indian Valley Fire Road and Rush Creek Fire Road include incorporating gentle rolling dips and replacing loose surface material with firm and stable compact surfaces in order to reduce slope-stability hazards (IAP, p. B-155 and p. B-167). At sites with soils that do not have sufficient strength and cohesion to provide a stable base for the trail surface/aggregate, a layer of non-woven geotextile fabric may be applied to the prepared area prior to the installation of the aggregate paving (IAP, p. B-188). The standard details in the proposed project comply with the BMPs for reducing geologic hazards listed in Table 6.9 of the RTMP (p. 6-34). Because the IAP follows RTMP's policies and BMPs to ensure new and existing trails would be designed to minimize risks from slope instability or landslide, this impact would continue to be less than significant, consistent with the RTMP TPEIR.
- d. The Biological Resources Assessment (pp. 28 through 32) concluded that the proposed projects at Hamilton Wetlands Preserve, Rush Creek Open Space Preserve, and Old St. Hilary's Open Space preserve contain soils that have high shrink-swell potential due to the presence of clay soils. There is Reyes clay at Hamilton Wetlands Preserve, Reyes Clay and Novato Clay at Rush Creek Open Space Preserve, and Henneke Stony Clay Loam at Old St. Hilary's Open Space Preserve. Although some parts of the proposed project would be located on expansive soils, it would not create substantial risks to life or property because the project sites do not contain, nor will it include the construction of structures on expansive soils. BMP Geologic Hazard-1 through -4 in the RTMP would impacts from trail location on expansive soils (RTMP, p. 6-34). Since the proposed project was developed in conformance with design specifications and BMPs from the RTMP, impacts from this project would continue to be less than significant, consistent with the RTMP TPEIR.
- e. The MCOSD preserves, county parks, or public lands within the modified project area does not provide restrooms or other facilities that would generate wastewater. The only restroom facilities located within the modified project area are portable toilets at Agate Beach County Park, Roy's Redwoods Open Space Preserve, and Whitehouse Pool County Park, which is routinely cleaned and maintained by a private contractor according to applicable federal, state, and local regulations and standards. Therefore, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts and would continue to have no impact, consistent with the RTMP TPEIR.

Greenhouse Gas Emissions

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	N/A
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	N/A

Conclusion: Regarding greenhouse gas emissions, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. The RTMP TPEIR (pp. 9-12 through 9-16) concluded that the RTMP project would generate short-term, temporary GHG emissions during construction and long-term operational GHG emissions from on-road vehicles. Table 9-2 in the RTMP TPEIR (p. 9-13) includes goals and policies from Marin County planning documents applicable to the RTMP designed to reduce air pollutant emissions. Because there would be no increase in construction or operation-related GHG emissions with the RTMP, and policies and implementation measures contained within the RTMP would further minimize GHG emissions, this impact would be less than significant. Since the proposed project was developed in conformance with will all applicable RTMP policies, standards, and BMPs, the project is not expected to generate additional direct or indirect greenhouse gas emissions that would have a significant impact on the environment. Therefore, the proposed project would continue to have a less than significant impact for GHG emissions, consistent with the RTMP TPEIR.
- b. The RTMP TPEIR (p. 9-12) concluded that the RTMP project would not result in an increase for construction or operation-related GHG emissions because the RTMP is consistent with The Marin County Greenhouse Gas Reduction Plan (2006), which sets out policies to help achieve the County’s greenhouse gas emissions targets (reducing GHG emission 15 to 20 percent below 1990 levels by the year 2020 for internal government and 15 percent countywide). The proposed project was developed in conformance with all applicable RTMP policies, standards, and BMPs; as a result, the proposed project is not expected to result in any new significant environmental impacts and would continue to have no impact to applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, consistent with the RTMP TPEIR.

Hazards and Hazardous Materials

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	N/A
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	N/A
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	N/A
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	N/A
e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			X	N/A
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?			X	N/A
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	N/A
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	N/A

Conclusion: Regarding hazards and hazardous materials, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR and the certified Subsequent EIR for Main Airfield Parcel Record of Decision/Remedial Action Plan for Hamilton Army Airfield.

Documentation:

- a. & b. The project would involve parking space reconfiguration, addition of informational signs at trailheads, trail resurfacing, and regrading. These activities may require the use of heavy construction equipment that uses petroleum based fuels and petrochemicals. Construction fuels and chemicals would be similar to those used in construction projects throughout the region, and would not be used in unusually large amounts. The RTMP TPEIR (p. 10-13) concluded that the temporary use of these chemicals during the maintenance of the trails could

potentially be released into the environment and adversely affect the environment, but implementation of existing County requirements and the RTMP BMPs would reduce the level of this potential effect to less than significant. Table 10-5 of the RTMP TPEIR (pp. 10-14 through 10-17) lists countywide policies and BMPs that would reduce impacts to less than significant levels. These policies and BMPs include, but are not limited to: reducing the use of hazardous materials on County property, identifying evacuation routes, promoting ecologically friendly products, preparing for hazardous materials incidents, and exercising proper use, storage, and disposal of chemicals in conformance with manufacturer's specifications and agency regulations. Since the proposed project was developed in conformance with the RTMP and would comply with all applicable policies and BMPs, the proposed project would not create or substantially increase hazards to the public or the environment resulting from transport, use, or disposal of hazardous materials. Impacts would continue to be less than significant, consistent with the RTMP TPEIR.

- c. The RTMP TPEIR (pp. 10-17 through 10-18) concluded that the RTMP has the potential to involve maintenance and construction activities near schools that would involve the use of heavy construction machinery, which would require the occasional transport and use of fuel and petrochemicals on preserves. There are 16 school facilities within ¼ mile of the MCOSD open space preserves within the modified project area: Dixie Elementary School, San Domenico School, Marindale School, Hidden Valley Elementary School, Brookside Elementary School, The Oak Hill School, and Sun Valley Elementary School near the Terra Linda-Sleepy Hollow Divide Open Space Preserve; Edna Maguire Elementary School and Park Elementary School near the Camino Alto Open Space Preserve; Marin Country Day School, Allaire School, Little School, Ring Mountain Day School, and Bel Aire Elementary School near Ring Mountain Open Space Preserve; the Romburg-Tiburon Center near Old St. Hilary's Open Space Preserve; and College of Marin – Indian Valley Campus adjacent to Indian Valley Open Space Preserve. Marin County and the RTMP contain policies and programs to reduce the risk of exposure to these chemicals, such as reducing the use of hazardous materials on County properties, purchasing non-toxic products when available, and strengthening the training and preparation of County emergency personnel to respond to emergencies involving hazardous materials. The implementation of these programs and policies would reduce this impact less than significant levels. Since the proposed project was developed in conformance with the RTMP and would comply with all applicable policies and BMPs, the proposed project would not create or substantially increase hazards to schools within ¼ mile of the project sites. Impacts would continue to be less than significant, consistent with the RTMP TPEIR.
- d. The proposed trail improvements at Hamilton Wetlands Preserve is located on a site which has an identified active hazardous materials site, or a Cortese List (Government Code Section 65962.5) site. Hamilton Army Airfield (AAF) was constructed in 1932 on reclaimed tidal wetlands by the United States Army Corps, where uses included firing ranges, burning of hazardous materials, waste disposal, and maintenance of antenna equipment. These historical uses have resulted in contamination with petroleum hydrocarbons, volatile and semi-volatile organic compounds, pesticides, metals, polynuclear aromatic hydrocarbons, dioxins/furans, polychlorinated biphenyls, nitroaromatics, and ordnance (DTSC 2016). Active hazardous sites associated with the Hamilton AAF are all located along the U.S. 101 Freeway, 3 miles north of Lucas Valley Road in Novato, California. The site names and details are as follows:

Table 3. Active Hazardous Sites within or near Hamilton Wetlands Preserve

Site or Facility Name	EnviroStor ID/ Site Code	Potential Contaminants of Concern	Potential Media Affected	Status	Size
Hamilton AAF – BRAC	21970008/ 200136	Metals, OCPs, PCBs, PAHs, uncategorized	Sediments, soil	Certified Operations and Maintenance, land use restrictions	712 acres
Hamilton GSA Lot 7	21970009/ 200714	Petroleum, volatile organics, uncategorized*	Indoor air, soil vapor, soil, surface water	Certified	1600 acres
Novato DoD Housing	21970011/ 200529	DDT, metals, petroleum, volatile organics, uncategorized*	Indoor air, other groundwater affected**, soil, soil vapor, surface water	Active	553 acres
Hamilton AAF North Antenna Field IR/MMRP	21970012/ 200714	Dioxin, explosives, metals, organichlorine pesticides, petroleum, PCBs, PAHs, radioactive isotopes, vinyl chloride, uncategorized*	Sediments, soil, surface water affected, under investigation	Active	269 acres
Hamilton AAF GSA Phase II IR	21970010/ 201268	Metals, methane, petroleum, PCBs, volatile organics	Contaminated surface/structure, indoor air, other groundwater affected**, soil, soil vapor	Active	300 acres

Sources: *Envirostor Database, DTSC*

* Hydrocarbon solvents, unspecified solvent mixtures

** uses other than drinking water

DDT – dichlorodiphenyltrichloroethane, used as insecticide

PCB – polychlorinated biphenyl, commonly used as an electrical insulator

PAH – polycyclic aromatic hydrocarbons, an organic compound noted for carcinogenic effects

Hamilton AAF – Base Realignment And Closure (BRAC) (Envirostor ID 21970008) and Hamilton GSA Lot 7 (Envirostor ID 21970009) are adjacent to the proposed project at Hamilton Wetlands Preserve, while the other active and certified sites are within 1 mile of the trail. This is a potential impact that was not previously evaluated in the RTMP TPEIR since the scope of the analysis for hazardous sites only focused on the 34 preserves the MCOSED owned at the time, not all of the roads and trails that the Marin County Parks maintains. Hamilton Wetlands Preserve is under ownership of the California State Coastal Conservancy. These sites associated with army operations at Hamilton Army Airfield has undergone extensive studies and remedial actions to remove contaminants resulting from historical use (Jones and Stokes 2003). The subsequent EIR for the Main Airfield Parcel Record of Decision/Remedial Action Plan for Hamilton AAF BRAC determined that the remedial actions taken at the site would reduce hazards to human health to a less than significant level. Shortly after the SEIR was certified, land use restrictions were placed the site which require any grading, excavation, and intrusive activities to obtain a soil management plan and/or health and safety plan approved by the Department of Toxic Substances Control and the San Francisco Bay Regional Water Quality Control Board (State) (Ch2MHill 2003, p.13). The installation of half-mile markers and trail resurfacing activities along Hamilton Path Trail would involve ground disturbance; these activities would take place no deeper than 12 inches below ground surface (IAP, pp. B-152 through B-153). Marin County Parks would coordinate with the California Coastal Conservancy to ensure that proper procedures regarding ground disturbance activities will be followed. The Hamilton Army Airfield also has land use restrictions prohibiting residences, schools, daycare facilities, hospitals, hospices, or similar sensitive uses (Ch2MHill 2003, p.14). The proposed project does not include any sensitive

uses prohibited by the land use restriction. In 1996, the State certified that contaminant levels at Hamilton GSA Lot 7 have been remediated to standards that are protective of human health and the environment (DTSC, 1995). There are no land use restrictions specific to this cleanup site. The 1996 DTSC letter also states that if new information is found during development or other activities, the State must be notified immediately so that a determination can be made if any further actions are warranted. All other sites within the modified project area for the proposed project are not located in an area with an active hazardous materials site. Since the proposed project would follow all applicable federal and state requirements pertaining to hazardous materials sites, this project would not create a significant hazard to the public or environment. Impacts would continue to be less than significant, consistent with the RTMP TPEIR.

- e. & f. Rush Creek Open Space Preserve is located 1.5 miles south of the Marin County Airport (Gnoss Field), Hamilton Wetlands Preserve is located 2.25 miles north of the Marin Ranch Airport (Smith Ranch), and Old St. Hilary’s Open Space Preserve is located 3 miles east of Richardson Bay Heliport (Sea Plane Adventures). The RTMP TPEIR (10-13) concluded that although these preserves are located near airfields, nothing about the proposed project would change airport operations or air travel at any of these identified facilities, nor would it result in any changes to where people live or work. Therefore, the proposed project would not change the exposure of people living or working near one of these fields, and there would continue to be no impact, consistent with the RTMP TPEIR.
- g. An evaluation of the potential for the proposed project to interfere with emergency response is presented in Transportation and Traffic section. For reasons set forth in the referenced section, this potential effect would continue to be less than significant, consistent with the RTMP TPEIR.
- h. The RTMP TPEIR (pp. 10-19 through 10-20) concluded that the RTMP and the proposed project could expose people or structures to wildland fires. The following project sites were evaluated with respect to wildfire hazard levels and amount of area considered as wildlife-urban interface:

Table 4. Fire Hazard within the Modified Project Area

Open Space Preserve/Park/Other Public Land	Fire Hazard Level Areas (acres)			WUI Interface Area (acres)	Adjacent to Residential Use?
	Moderate	High	Very High		
Agate Beach County Park	n/a	n/a	n/a	n/a	Yes
Camino Alto OSP	None	None	None	170.94	Yes
Deer Island OSP	None	0.59	None	11.05	No
Greenbridge County Park	n/a	n/a	n/a	n/a	No
Hamilton Wetlands Preserve	n/a	n/a	n/a	n/a	Yes
Indian Valley OSP	571.93	1.33	None	137.60	Yes
Old St. Hilary’s OSP	None	0.18	None	123.77	Yes
Roy’s Redwoods OSP	281.58	None	None	41.11	No
Rush Creek OSP	246.37	None	None	205.82	Yes

Open Space Preserve/Park/Other Public Land	Fire Hazard Level Areas (acres)			WUI Interface Area (acres)	Adjacent to Residential Use?
	Moderate	High	Very High		
Ring Mountain OSP	None	312.74	None	294.50	Yes
Santa Margarita Island OSP	None	None	None	None	Yes
Santa Venetia OSP	None	None	None	0.50	Yes
Terra Linda/Sleepy Hollow Divide OSP	182.44	None	None	942.32	Yes
Whitehouse Pool County Park	n/a	n/a	n/a	n/a	Yes

Source: Marin County GIS 2013, Table 10-1 from RTMP TPEIR
n/a = data not available because area has not yet been evaluated

11 out of 14 MCOSD preserves, county parks, and other public lands within the modified project area are located in areas of moderate or high wildland fire risk are adjacent to residential use, with the exception of Deer Island Open Space Preserve, Greenbridge County Park, and Roy’s Redwoods Open Space Preserve. In response to this concern and adopted Marin County and MCOSD policies, many of the roads within the open space preserves serve as fire and access (i.e., patrol, maintenance, emergency) roads in addition to their recreational use. The Marin Countywide Plan, the MCOSD Policy Review Initiative, and the RTMP contain policies to reduce the likelihood of wildfires, and to improve access and response by emergency personnel when wildfires do occur. These goals, policies, implementation measures, and their effects on limiting the impacts of the RTMP implementation related to wildfires are shown in Table 10-6 of the TPEIR (p. 10-20). Examples of measures taken to limit the impacts of wildfire include, but is not limited to: constructing and maintaining fuel breaks and emergency access routes to facilitate effective fire suppression; planning and conducting fire fuel reduction activities; working with adjoining property owners to create defensible space surrounding homes and other improvements; restricting trail access when red-flag conditions exist; and equipping all vehicles with a suitable fire extinguisher. Although the RTMP would not eliminate the existing risk of wildfire, it includes many policies to reduce the current risk, and activities conducted under the RTMP would not create a reasonably foreseeable increase in risk. Existing fire access would be maintained, and the RTMP would not interfere with any existing or future fire prevention activities. For these reasons, this would be a less than significant impact, and no mitigation would be necessary. Since the proposed project was developed in conformance with the RTMP and would comply with all applicable policies and BMPs, the proposed project would not create additional risk or substantially increase risk for people or structures to loss, injury, or death involving wildland fires. The proposed project would continue to have a less than significant impact, consistent with the RTMP TPEIR.

Hydrology and Water Quality

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Violate any water quality standards or waste discharge requirements?		X		Construction Contracts-1; Water Quality -1 through -9
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	N/A
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?		X		Construction Contracts-1; Water Quality -1 through -9
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		X		Construction Contracts-1; Water Quality -1 through -9
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?		X		Construction Contracts-1; Water Quality -1 through -9
f) Otherwise substantially degrade water quality?		X		Construction Contracts-1; Water Quality -1 through -9
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X	N/A
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?			X	N/A
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X	N/A
j) Inundation by seiche, tsunami, or mudflow?			X	N/A

Conclusion: Regarding hydrology and water quality, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. & f. The RTMP TPEIR (pp. 11-49 through 11-62) concluded that future maintenance activities on roads and trails has the potential to release sediment and other pollutants into streams and watercourses within and adjacent to MCO SD preserves. Additionally, continued operation of existing roads and trails could generate sediment from improperly designed and located facilities. Existing federal, state, and local policies and regulations act to limit pollutant generation. The policies, procedures, and BMPs contained in the RTMP are consistent with federal, state, and local policies, and would manage maintenance and construction activities according to these policies to reduce erosion and sediment generation. For these reasons, this would be a less than significant impact. Construction activities for the proposed project associated with decommissioning and improving roads and trails can create temporary disturbance and serve as a sediment source. One of the primary objectives of the RTMP is to reduce the environmental impact of roads and trails on sensitive resources, habitats, riparian areas, and special status plant and animal species. The long-term effect of the RTMP would be to improve water quality over existing conditions. Some of the policies, procedures, and BMPs in the RTMP that help to reduce the proposed project's impacts to water quality include, but are not limited to: conducting construction work during the dry season whenever possible; avoiding working in or near water bodies; maintaining erosion- and sediment-control devices during ground disturbance activities; employee and contractor education and training; and covering loose soil (Tables 11-7 through 11-11 of the RTMP TPEIR, located on pp. 11-50 through 11-60). The policies and practices discussed in this impact discussion and set forth in Tables 11-7 through 11-11 of the RTMP TPEIR would be followed by Marin County Parks, its representatives, and project contractors as applicable and appropriate. Permits from the San Francisco Regional Water Quality Control Board (SF RWQCB) may be applied for on a site-specific basis as needed, and all mandatory mitigation or conditions would be implemented by Marin County Parks. When required, this process typically results in implementation of measures to protect water quality related to trail construction, in addition to the RTMP policies and BMPs set forth in Table 11-11 of the TPEIR (pp. 11-56 through 11-60). Compliance would include adhering to the National Pollutant Discharge Elimination System (NPDES) programs, including the development of a Stormwater Pollution Prevention Plan (SWPPP), where ground disturbance is greater than one acre, rigorous site monitoring, and storm water sampling and reporting. Where these measures overlap, the more protective measure will apply. For projects not requiring permits or regulatory involvement, the RTMP BMPs will be implemented to protect sensitive resources. The policies and BMPs of the RTMP would apply to the proposed project. The RTMP policies for improving the road and trail system, standardizing sustainable road and trail designs, implementing temporary and permanent BMPs, and complying with existing NPDES and other water quality regulations would reduce or avoid potential impacts to water quality. At a programmatic level, this would be a less than significant impact, and no mitigation would be necessary. The proposed project was developed in conformance with all applicable RTMP standards, policies, and BMPs; thus, the project would continue to have a less than significant impact on the existing water quality, consistent with the RTMP TPEIR.
- b. The RTMP TPEIR (p. 11-64) concluded that the RTMP would not result in the use of groundwater or interfere with groundwater recharge. There are no facilities proposed as part of this project that would require the use of groundwater, nor would the proposed project increase impermeable surfaces to an extent that would interfere substantially with

groundwater recharge. Therefore, there continues to be no impacts to groundwater, consistent with the RTMP TPEIR.

- c. & d. The proposed project would regrade trails, stabilize stream crossings, and add water control features according to design and engineering specifications in the RTMP that are meant to follow the natural contours of the landscape, improve stormwater conveyance over the trails to prevent erosion, and improve the user experience for people with disabilities using wheelchairs or other power-driven mobility devices. The RTMP TPEIR (p. 11-62) concluded that future maintenance or construction activities would have the potential to alter waterways within MCOSSD preserves and provide an ongoing source of erosion and sedimentation of water bodies. The policies, procedures, standards, and BMPs contained in the RTMP would manage maintenance and construction activities, and result in the reconstruction of improperly designed or located facilities to reduce erosion and sediment generation. For these reasons, this would be a less than significant impact. Examples of standard design measures in the proposed project meant to reduce negative impacts resulting from poor drainage patterns include incorporating the appropriate road and trail cross sections, incorporating dips and water bars, compacting trail surface to improve slope stability, and providing the appropriate drainage/wetland/stream crossing to avoid sedimentation and erosion (IAP, p. B-155, B-156, B-167, B-181, B-182; also Tables 11-7 through 11-11 of the RTMP TPEIR, located on pp. 11-50 through 11-60). The proposed project was developed in conformance with all applicable standards, policies, and BMP in the RTMP; thus, the proposed would continue to have a less than significant impact on the existing drainage pattern, consistent with the RTMP TPEIR.
- d. & e. Improvements to the existing parking area at Rush Creek fire road would include the modification of an existing parking area to include 3 spaces of paved parking, one of which would be accessible, see IAP, p. B-170. The design specifications indicate that if feasible, the parking spaces would be a permeable concrete pad. Otherwise, other proposed activities would replace road aggregate with compacted decomposed granite or similar firm and stable surfacing, and would not increase the area of impermeable surfaces that would lead to an increase in the rate or amount of stormwater runoff. The RTMP TPEIR (p. 11-63) concluded that future development of impervious surfaces such as parking areas with hardened gravel or asphalt surfaces would limit infiltration and increase runoff volumes and peak flows. Increased runoff volumes and peak flows associated with impervious surfaces may lead to increased erosion and resultant pollution, or overwhelm downstream storm drain facilities or waterways. Because the development of large areas of impervious surfaces would be rare within project area, and the RTMP contains policies to avoid these adverse effects, this impact would be less than significant. Some of the policies to avoid adverse effects include RTMP Policy SW.29, which requires all new impervious surfaces to be constructed of permeable paving or an equivalent. The permeable paving at the Rush Creek Open Space Preserve trailhead follow this policy, which permits the infiltration of rainfall from the improved parking area. Since the proposed project's trail improvements include hardened surface treatments with proper drainage controls/conveyances, runoff would be managed and the proposed project will prevent negative downstream impacts. The proposed project was developed in conformance with all applicable policies, standards, and BMPs in the RTMP; therefore, the proposed project will continue to have a less than significant impact to stormwater runoff, consistent with the RTMP TPEIR.
- g. The MCOSSD does not currently provide housing within its preserves that could be exposed to floodwaters, and would not construct residences within preserves with the RTMP. The

proposed project does not include housing. Therefore, the project would continue to have no impact, consistent with the RTMP TPEIR.

h., i., & j. The RTMP TPEIR (p.11-65) concluded that the RTMP would not expose people or structures to flooding, and this would be a less than significant effect. Flooding is probable and often beneficial in the lower elevation wetland and lagoon preserves like Greenbridge County Park, Hamilton Wetlands Preserve, Rush Creek Open Space Preserve, Santa Venetia Marsh Open Space Preserve, and Whitehouse Pool County Park. The following table indicates whether project sites are located in the 100-year flood zone:

Table 5. Flood Risk in the Modified Project Area

Open Space Preserve/Park Name	Flood Zone	FEMA Category
Agate Beach Bluff	No	X
Camino Alto Open Space Preserve	No	X
Deer Island Open Space Preserve	No; but surrounding land including trailhead is in flood zone	X; surrounding land categorized as AE (EL 10 feet)
Greenbridge County Park	Yes	AE (EL 13 to 18 feet); regulatory floodway overlay
Hamilton Wetlands Preserve	Yes	AE (EL 9 feet)
Indian Valley Open Space Preserve	No	X
Old St. Hilary’s Open Space Preserve	No	X
Ring Mountain Open Space Preserve	No	X
Roy’s Redwoods Open Space Preserve	No	X
Rush Creek Open Space Preserve	No in upland and trail areas; Yes in wetlands	X in upland and trail areas; AE (EL 9 feet) in wetlands
Santa Margarita Open Space Preserve	Yes for majority of the trail; No in upland areas containing trailhead at island	AE (EL 10 feet) for majority of trail; X in upland areas containing trailhead at island
Santa Venetia Marsh Open Space Preserve	Yes	AE (EL 10 feet)
Terra Linda-Sleepy Hollow Divide Open Space Preserve	No	X
Whitehouse Pool County Park	Yes	AE (EL 13 to 16 feet); regulatory floodway overlay

Source: FEMA’s National Flood Hazard Layer (official), 2016. Interactive flood mapping located at <http://fema.maps.arcgis.com/home/webmap/viewer.html>

X – Areas determined to be outside the 1 percent and 0.2 percent annual chance floodplains.

AE – Areas subject to inundation by the 1 percent annual chance flood event. Base flood elevations are shown as “EL x feet”.

The areas that are subject to 100-year floods are also subject to increased inundation as a result of predicted sea level rise and sudden high water from a tsunami event. Many of the actions under the RTMP would help to alleviate localized flooding by eliminating and properly designing for stream and drainage crossings. Since the proposed project was developed in conformance with the RTMP and its associated policies and BMPs, the project would continue to have less than significant impacts, consistent with the RTMP TPEIR.

Land Use and Planning

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Disrupt or divide the physical arrangement of a community?			X	N/A
b) Be incompatible with existing land use in the vicinity?			X	N/A
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?			X	N/A

Conclusion: Regarding land use and planning, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. There are no residences or neighborhoods within the modified project area. There are residences located adjacent to preserves, county parks, or other public lands at Agate Beach County Park, Camino Alto Open Space Preserve, Hamilton Wetlands Preserve, Indian Valley Open Space Preserve, Old St. Hilary's Open Space Preserve, Ring Mountain Open Space Preserve, Rush Creek Open Space Preserve, Santa Venetia Open Space Preserve, and Terra Linda/Sleepy Hollow Divide Open Space Preserve. Because there are no residences or established communities within the modified project area, and the proposed project would have no effect on adjacent residential land uses, implementation of the proposed project would not physically divide an established community. The proposed project would continue to have no impact, consistent with the RTMP TPEIR.
- b. The proposed project would result in continued open space uses of the preserves. The open space use would not be modified and would remain consistent with goals and policies to protect and enhance open space adopted by Marin County and the various cities. Implementation of the proposed project would ensure that resource protection policies outlined in the RTMP would be applied modified project area, thereby enhance the existing open space values. The proposed project would continue to have no impact, consistent with the RTMP TPEIR.
- c. The RTMP TPEIR (p. 14-8) concluded that there are "no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation

plan has been approved for the project area.” The modified project area would not contain locations that have approved conservation plans. The proposed project would continue to have no impact, consistent with the RTMP TPEIR.

Mineral Resources

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?			X	N/A
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			X	N/A

Conclusion: Regarding mineral resources, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. & b. The RTMP TPEIR (pp. 14-8 through 14-9) concluded that there are no designated mineral resource zones on or near the proposed project sites. The modified project area does not contain designated mineral resources zones, nor are any of the preserves, county parks, and public lands located adjacent to mineral resource zones. The proposed project would continue to have no impacts, consistent with the RTMP TPEIR.

Noise

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		Noise – 1 and 2
b) Expose persons to or generate excessive ground-borne vibration or ground-borne noise levels?		X		Noise - 1

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?		X		Noise – 1 and 2
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		X		Noise – 1 and 2
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?			X	N/A
f) For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels?			X	N/A

Conclusion: Regarding noise, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

a. c. & d. Noise in Marin County is governed by the Marin Countywide Plan, Marin County Code, and the MCOSD Code. The proposed project would require heavy machinery and other powered equipment, as well as traffic from construction and employee vehicles to and from Access and Discovery Trails. Implementation of the proposed project would generate short-term, temporary noise during construction and maintenance activities. A number of the proposed project sites share boundaries with residential uses at the trailhead or along the trail, including Agate Beach Bluff trail, Hamilton Path, Indian Valley Fire Road, Rush Creek Fire Road, and Vistazo Fire Road. Construction noise from activities adjacent to residential areas could result in a temporary annoyance for residents of these areas. Construction noise is largely a function of the construction equipment used, the location and sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Construction noise levels would vary depending on construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of barriers between the noise source and receptor. All noise-generating construction activities are anticipated to be conducted on weekdays between the hours of 7 am to 6 pm and Saturdays between 9 am to 5 pm. Construction work would not take place on Sundays and Holidays.

The proposed project would not expand the road and trail system; however, it would require an increase in maintenance activities, and expand existing policies to allow other power-driven mobility devices. The increase in maintenance activities would primarily result from maintaining accessibility for decomposed granite for trails in the Access and Discovery Trails. Activities related to maintaining trail surface would be minor (filling in gaps, compacting surfaces, evening out surface) and would cause temporary increases in ambient sound levels

due to use of machinery (e.g. soil compactor). Maintenance activities are subject to the same policies that govern construction activities. The proposed project would also expand policies regarding power-driven mobility devices (e.g. electric bicycles and Segways) to be used by qualified users, which is consistent with Policy TRL-2.5¹¹ and Policy T1g¹². As part of the proposed policy/guidance expansion, the other-power driven mobility devices that would be allowed within the Marin County Parks roads and trails includes restrictions on engine type and noise level. Page 4-14 of the IAP states “the engine noise level from an OPDMD may not exceed 60 dB measured on the A-weighted scale at a distance of 50 feet.” In the Marin Countywide Plan, the “normally acceptable” noise limit for land use categorized as “playgrounds and neighborhood parks” is 70 dB. Therefore, the expanded policies regarding the use of other powered driven mobility devices would not conflict with existing noise policies. The primary intent is to improve the trail system for existing users. Overall, the proposed project would not represent an increase over existing conditions.

The RTMP includes implementation measures that commit Marin County Parks to comply with the Marin County Noise Ordinance to minimize the noise impacts of construction and maintenance activities on adjacent sensitive receptors, in addition to policies to prohibit the use of recreational motorized vehicles within the preserves (with exceptions) and to regulate special uses to prevent adverse levels of noise. One of the Noise Construction BMPs include ensuring that equipment and vehicles utilize the best available noise-control techniques (e.g. mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures). Finally, both the Marin County and MCOSD codes prohibit loud or unnecessary noises within and adjacent to open space preserves. For these reasons, there would be no increases in either permanent or temporary noise levels that would exceed local standards, or that would result in an adverse impact. The RTMP TPEIR (pp. 12-8 through 12-12) concluded that the RTMP would not expose persons to noise levels in excess of adopted standards, cause a significant permanent increase in noise levels, or result in a substantial temporary or permanent increase in ambient noise levels. This impact would be less than significant, and no mitigation would be required. Since the proposed project was developed in conformance with the RTMP and its associated policies and BMPs, impacts to noise levels would continue to remain less than significant, consistent with the RTMP TPEIR.

- b. The proposed project includes maintenance and construction activities that would generate ground-borne vibration or noise in the vicinity of work areas. Resurfacing activities at the project sites will require the use of excavators, vibro plate compactor, or vibratory roller to compact road and trail aggregate material. The RTMP TPEIR (p.12-12) concluded that since all activities initiated under the RTMP would meet Marin County noise standards and adhere to BMPs to attenuate noise levels, this impact would be less than significant. Since the proposed project was developed in conformance with the RTMP and its associated policies and BMPs, impacts to ground-borne vibrations or ground-borne noise levels would continue to be less than significant, consistent with the RTMP TPEIR.
- e. & f. Rush Creek Open Space Preserve is located 1.5 miles south of the Marin County Airport (Gnoss Field), Hamilton Wetlands Preserve is located 2.25 miles north of the Marin Ranch Airport (Smith Ranch), and Camino Alto Open Space Preserve, Ring Mountain Open Space Preserve Old St. Hilary’s Open Space Preserve is located within 3 miles of Richardson Bay Heliport (Sea Plane Adventures). Nothing about the proposed project would change air travel at any of these facilities, nor would it result to changes where people live or work. The RTMP

¹¹ TRL-2.5: Provide Access for Persons with Disabilities. Design and develop trails and trail programs to enhance accessibility by persons with disabilities.

¹² Policy T1g: The MCOSD will prohibit the use of motorized vehicles on open space, with authorized exceptions.

TPEIR (p.12-7) concluded that the RTMP would not expose people residing or working in open space preserves to excessive aircraft noise, and this would be a less than significant impact. The proposed project would continue to have a less than significant impact, consistent with the RTMP TPEIR.

Population and Housing

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	N/A
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?			X	N/A
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?			X	N/A

Conclusion: Regarding population and housing, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. Implementation of the proposed project would result in the continued maintenance of existing roads and trails, and the accessibility improvements for existing recreational roads and trails. Implementation of the proposed project would not result in the construction of any new residences or employment-generating land uses. No existing infrastructure or roads within or adjacent to the modified project area would be negatively affected. No modification to the open space uses of the modified project area would occur with implementation of the proposed project, nor would the proposed project modify any General Plan land use or Zoning designations that would permit any additional developed or urban uses within or adjacent to the preserves. Implementation of the proposed project would not result in the need for a substantial number of new workers. Therefore, the proposed project would not induce substantial growth in Marin County. The impact of growth inducement for the IAP would continue to be less than significant, consistent with the RTMP TPEIR.
- b. & c. There are no occupied housing units within the MCOSD preserves, Marin County Parks, or other public lands located in the modified project area. Therefore, neither housing units nor people would be displaced with the IAP, so no replacement housing would be required. There would continue to be no impact, consistent with the RTMP TPEIR.

Public Services

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?			X	N/A
Police protection?			X	N/A
Schools?			X	N/A
Parks?			X	N/A
Solid waste?			X	N/A

Conclusion: Regarding public services, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. Implementation of the proposed project would not result in the placement of housing within the modified project area or result in any other action that would require the provision of non-emergency public services. Because the IAP would help maintain existing emergency access (through improvement and maintenance of fire roads), it would not interfere with emergency access. Although public use of the trails identified in the IAP may increase in the future, this increase is expected to result from increased accessibility, population growth, or changes in recreation demands. No aspect of the proposed project would result in significantly increased visitation that would lead to significant increases in service demands to serve additional users. No new public facilities for emergency services would need to be constructed to serve uses proposed in the project. This would continue to be a less than significant impact, consistent with the RTMP TPEIR. (For an evaluation of wildland fire hazards, please see the Hazards and Hazardous Materials section in this Initial Study.)

Recreation

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Result in an increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	N/A
b) Include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?			X	N/A

Conclusion: Regarding recreation, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. The Marin Countywide Plan and the MCOSED policy documents, including the RTMP, set forth numerous policies that are intended to preserve desired recreation experiences and thereby prevent displacement to other regional parks and recreation areas. These policies include Goal TRL-1 (maintain the trail system), TRL 2.6 and Policy P2 (maintain multiple entry points), and SW.14 (displacement of existing users). While it is likely there could be some displacement within the modified project area from one trail to another, it seems unlikely that displacement outside the modified project area would occur. Marin County Parks provides more than 44 percent of the county’s unpaved trails, and more than 200 miles of inventoried roads and trails across 34 preserves and more than 15,000 acres. The proposed project does not include construction or removal of developed recreation facilities such as playfields, courts, or picnic facilities within the MCOSED open space preserves, county parks, and other public lands within the modified project area; therefore there would be no displacement of these uses to adjacent neighborhood parks, and this potential effect will not be examined further. The proposed project would increase user accessibility, and would not likely result in displacement of trail users within the modified project area. Potential displacement to available trails on adjacent lands would not be substantial. Since the proposed project was developed in conformance with the policies and objectives within the RTMP, impacts from this project would continue to be less than significant, consistent with the RTMP TPEIR.
- b. Implementation of the proposed project will result in construction to maintain and improve trails and its associated facilities, but will not add or decrease the total amount of trails. As stated in the RTMP TPEIR (pp. 14-14 through 14-15), the environmental effects of roads and trails on sensitive resources, habitats, riparian areas, and special status species would be reduced to less than significant levels due to the policies, design standards, and BMPs in the RTMP. As assessed in this Addendum, implementation of the proposed project would continue to avoid or reduce all identified physical effects of maintaining, reconstructing, or

constructing the trails within MCOSED preserves, county parks and other public lands to less than significant levels, consistent with the RTMP TPEIR.

Transportation/Traffic

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?			X	N/A
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?			X	N/A
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			X	N/A
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?			X	N/A
e) Result in inadequate emergency access?			X	N/A
f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X	N/A

Conclusion: Regarding transportation/traffic, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. & b. The RTMP TPEIR listed and evaluated plans, ordinances, and policies that establish measures of effectiveness for the performance of the transportation system in Marin County. Table 13-3 of the TPEIR (pp. 13-14 through 13-15) lists the relevant policies from the Marin Countywide Plan and the MCOSED Policy Review Initiative and demonstrates that the RTMP would be consistent with, or avoid conflicts with, the listed policies. The RTMP also developed system-wide policies for Marin County Parks to reduce potential parking conflicts. These policies include requiring a permit for organized or recreational activities or events and prohibiting unofficial/non-sponsored group activities of more than 15 people. These policies allow Marin County Parks to ensure that there are proper traffic controls in place and adequate parking spaces for special events, which avoids the potential for adverse parking effects in neighborhoods adjacent to trailheads. The proposed project has potential to increase visitor use of the trails within the Access and Discovery Trails and Improve

Access Trails network, particularly visitors with disabilities. Physical trail improvements at the Access and Discovery Trails would potentially attract new users to the MCOSD preserves, county parks, and other public lands since the trails will be easier to navigate. In addition, the communications strategy could also potentially increase trail use because it would allow people to match trail conditions with their physical ability. The increase in trail use resulting from the proposed project is not expected to substantially increase the existing volume of trail users at Marin County Parks, and would not cause substantial increases in vehicle trips to and from the modified project area. The modification of the project area and addition of accessibility-related policies was developed in conformance with the policies and within the RTMP. The project would continue to result in a less than significant impact, consistent with the RTMP TPEIR.

- c. The proposed project would not result in a change in air traffic patterns any airports within Marin County, would not increase air traffic levels, or change in air traffic location (e.g., flight paths). The RTMP TPEIR (p.13-13) indicates that there may be a very small number of visitors who travel to Marin County by airplane; a visitor survey of the MCOSD preserves indicated that 91 percent of visitors live in Marin County and 3 percent live in Sonoma County. The RTMP may change which trail they use, but it would not create additional travel by out-of-region travelers, nor would it change patterns of air travel. Because of these reasons, the proposed project would continue to have a less than significant change in air traffic patterns, consistent with the RTMP TPEIR.
- d. The proposed project does not include any actions to redesign or modify any public roads or intersections, and it would not change the use of any roadways by agricultural equipment. In addition, the policies of the RTMP would not encourage or place additional cycle, pedestrian, other power driven mobility device, or equestrian traffic on major roadways. For these reasons, implementation of the proposed project would not substantially increase safety hazards on roadways within Marin County; this would continue to be a less than significant impact, consistent with the RTMP TPEIR.
- e. The RTMP TPEIR (pp. 13-17 through 13-18) concluded that the RTMP would maintain existing levels of access, would permit additional access for people with disabilities as demonstrated and necessary, and would not interfere with emergency access to the wildlands for fire suppression. Therefore, this impact would be less than significant. The RTMP acknowledges that emergency access is an important purpose for many of the roads and trails within preserves, particularly for fire protection, but also for other utility infrastructure. Some of the trails within the proposed project (e.g. Escalon Fire Road, Indian Valley Fire Road, Pinheiro Fire Road, Ridgewood Fire Road, Rush Creek Fire Road, Taylor Fire Raod, and Vistazo Fire Road) currently provides emergency access, thus maintaining these trails would only serve to ensure that emergency response teams and vehicles would continue to have adequate access to wildlands for fire suppression. Since the proposed project was developed in conformance with the policies, objectives, and BMPs within the RTMP, impacts from this project would continue to be less than significant.
- f. The RTMP TPEIR (p. 13-19) concluded that the RTMP would not conflict with adopted plans, programs, or policies encouraging alternative modes of transportation. This would be a less than significant impact because Marin County Parks has adopted several policies as set forth in Table 13-6 (RTMP TPEIR, p. 13-19) to encourage recreationists to use alternative modes of travel. The proposed project helps implement the policies in the RTMP. For example, the proposed trail improvements at Whitehouse Pool County Park involves interagency coordination with Marin County transit to improve the bus stop located adjacent to the trail. In addition, the expanded policies regarding other power driven mobility devices and service

animals sets forth specific guidelines that would ensure the safety of pedestrians, cyclists and other trail users. The Marin Countywide Plan and the Marin Congestion Management Program contain policies to encourage non-vehicle modes of travel. These policies focus on the provision of facilities and services for public transit, bicycles, and pedestrians in urban areas, and are therefore not directly relevant to the RTMP. Similarly, policies contained in the Bicycle and Pedestrian Master Plan pertain only to the biking and walking as modes of transportation, not recreation, and focus on urban areas. For these reasons, this impact would be continue to be less than significant, consistent with the RTMP TPEIR.

Utilities and Services Systems

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	N/A
b) Require or result in the construction of new water or wastewater treatment or distribution facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	N/A
c) Require or result in the construction of a new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	N/A
d) Result in the need for new or expanded water supply entitlements?			X	N/A
e) Result in a determination by the wastewater treatment provider that serves the project area that it does not have adequate capacity to serve the project area's projected demand in addition to the provider's existing commitments?			X	N/A
f) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	N/A
g) Fail to comply with federal, state, and local statutes and regulations related to solid waste?			X	N/A

Conclusion: Regarding utilities and service systems, the proposed project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines Section 15162). All impacts are adequately evaluated in the certified RTMP TPEIR.

Documentation:

- a. b. & e. The RTMP TPEIR (p. 14-17) concluded that no wastewater collection or treatment services are provided to the MCOSD open space preserves, and since the preserves consist solely of undeveloped open space, there is no existing demand for such services. The county

parcs and Coastal Conservancy preserve property that is part of the modified project area are not provided with wastewater collection or treatment services. No aspect of implementing the proposed project would result in increased residents or visitation that would lead to increases in service demands for wastewater collection and treatment. Because no wastewater facilities serve the modified project areas, the proposed project would not require wastewater treatment and collection; therefore, there would continue to be no impacts, consistent with the conclusion in the RTMP TPEIR.

c. There are existing stormwater drainage facilities (storm drains, v-ditches, culverts, etc.) within the modified project area. No aspect of implementing the proposed project would result in developed uses that would lead to an increase in stormwater generation that could require the addition or modification of any storm drainage facility. Since the proposed project does not require additions or modifications for existing stormwater drainage facilities, the proposed project would continue to have no impact, consistent with the RTMP TPEIR.

d. & e. The RTMP TPEIR (p. 14-17) concluded that no community water treatment or distribution facilities serve the MCOSED open space preserves, and since the preserves consist solely of undeveloped open space, there is no existing demand for treated water supply or treatment and delivery facilities. The open space preserves serve to protect water quality within several watersheds that serve as a source of raw water for the urban residents of Marin County. There are developed water storage and transmission facilities located in several of the MCOSED preserves. These facilities are components of larger urban water storage, treatment, and distribution systems, and do not provide treated water to preserves.

No aspect of implementing the proposed project would result in developed uses that would lead to an increase in demand for treated water that would require the construction of new facilities, or result in any adverse effects to water supply or quality. Because no urban water facilities serve the MCOSED preserves, and the IAP would not require the provision of treated water, there would be no impact to either existing or projected water supplies, and no new water infrastructure would be needed. There would continue to be no impact, consistent with the RTMP TPEIR.

f. & g. The RTMP TPEIR (p. 14-17) concluded that no solid waste collection or disposal services are provided to the MCOSED open space preserves, and since the preserves consist solely of undeveloped open space, there is no existing demand for such services. The county parks and Coastal Conservancy preserve property that is part of the modified project area are not provided with solid waste collection or disposal services. No aspect of implementing the proposed project would result in the increase of residents, changes to land uses, or increase in visitation that would lead to new service demands for solid waste collection and disposal. Because no solid waste services or facilities serve the modified project area, and because the proposed project would not require solid waste collection and disposal, there would continue to be no impact, consistent with the RTMP TPEIR.

Mandatory Findings of Significance

Would the project:

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
a) Does the project have the potential to degrade the quality of the environment, substantially		X		See respective

	New significant impact not identified in the EIR	Less than significant impact with BMPs, consistent with the EIR	Less than significant impact or no impact, no BMPs req'd, consistent with the EIR	Relevant BMPs
reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				sections above for relevant BMPs
b) Does the project have impacts that are individually limited, but cumulatively considerable (“cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		X		See respective sections above for relevant BMPs
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X		See respective sections above for relevant BMPs

Documentation:

- a. Based on the preceding discussion, it has been determined that the proposed project would have a less than significant potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. This is consistent with the RTMP TPEIR.
- b. According to CEQA Guidelines Section 15355, “Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. The potential cumulative impacts of the project together with these related projects have been considered for each environmental topic evaluated above. Given the relatively short-term nature of the proposed project’s construction schedule, and the fact that the proposed project would serve residents within a relatively urbanized area, the project is not anticipated to have any cumulatively considerable impacts beyond those identified and analyzed in the RTMP TPEIR.
- c. The proposed project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, beyond those previously identified and analyzed in the RTMP TPEIR.

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Appendix A: Biological Resources Assessment

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