



Protecting Marin Since 1934

To: Board of Directors, Marin County Open Space District
From: Nona B. Dennis, President, Marin Conservation League
Date: February 8, 2010
Subject: February 9 : Request to transfer up to \$248,810 from the Trails Legacy Fund to the Open Space District to offset costs associated with planning and building the 680 Trail

At the joint Board of Directors and Parks and Open Space Commission on February 2, District staff presented four "approaches" for addressing conflicts among trail users and continuing with the Road and Trails Management Planning. One of "approaches" was the construction of the 680 Trail. At the conclusion of the meeting, I asked why the 680 Trail was not included in the list of approaches, reduced to three, on which the Board was to give direction to staff. The response by President Arnold was that "it" (the 680 Trail) was in a work plan that had already been approved by the Board. There was no further explanation – what level of planning for the 680 Trail had been approved? Did the approval include construction of the Trail? In every respect the 680 Trail was presented on February 2 as a *fait accompli*.

The Board is now requested to transfer funds from the Trails Legacy Fund to offset costs associated with planning and building the Trail. The Marin Conservation League requests that the Board defer approving the request until the required environmental review under CEQA has been completed and the public has had an adequate opportunity to comment. To approve those funds at this time is tantamount to approving the project before CEQA compliance – a violation of the law. As an alternative, the funds could be divided, allowing partial funding for essential environmental investigations to take place, and deferring transfer of funds for actual construction until that has been authorized.

Even at a preliminary glance, the proposed Trail, which crosses undisturbed grasslands and wildlife habitat, has potentially significant impacts – geological, esthetic/visual, biological, and safety, at the least. The Initial Study, supported by field investigations, will provide essential information. It appears, however, that the I.S. is being conducted on the assumption that an alternative already has been selected (with possible minor adjustments), allowing no opportunity for evaluation of alternative alignments, including existing fire roads. Furthermore, the public has been exposed to the plan only in the past two weeks, and has not been given adequate opportunity to participate.

We continue to be very concerned that the Board and staff are pushing a project under an unrealistic time schedule, and without adequate attention to its environmental impacts or the law that addresses them.

Nona Dennis
President