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Subject: Comments on Buck Gulch Falls Creek Restoration and Trail Improvement Project Initial Study and Mitigated Negative Declaration

Dear Mr. Hoorn,

Marin Conservation League (MCL) appreciates the opportunity to comment on the Draft Initial Study (IS) and Proposed Mitigated Negative Declaration (MND) for the Buck Gulch Falls Creek Restoration and Trail Improvement Project (Project). Marin County Open Space District (MCOSD) staff have actively engaged the community, including MCL, in developing this project, and have provided multiple presentations and site visits to garner input. We appreciate the opportunities for public participation and MCOSD efforts to incorporate feedback into project designs.

We think the proposed project as described in the IS/MND is a good example of balancing habitat enhancement and trail improvements to protect natural resources. The current alignment of Buck Gulch Falls Trail directs visitors to cross through the creek channel at two locations, and the undefined nature of the trail has led to streambank trampling, loss of vegetation, and ongoing erosion. The proposed project creates a trail system which allows visitors to experience the riparian corridor while reducing direct impacts to the stream. The project moves the trail away from the stream channel allowing for native revegetation and protection of the riparian corridor, which is essential habitat for many wildlife species. The proposed project also includes a streambank stabilization component along a deeply eroded creek section which features large rock for toe protection and willow, big-leaf maple, and coast live oak plantings to increase shade and cover in this sunny, exposed area of the creek. We expect that the proposed changes will reduce erosion, improve riparian habitat, and protect the stream channel.

The purpose of the proposed project is to provide the public with a safe multi-use trail system to enhance visitor experience, reduce environmental impacts on sensitive resources by reducing sedimentation and erosion, and establish a sustainable trail system that provides safe year-round access. Objectives of the proposed project include restoring Arroyo de San Jose Creek and improving in-stream, riparian, and upland habitat by implementing streambank stabilization, providing bridges for crossing the creek channel, and reducing erosion and sedimentation. Enhancing habitat protection and ecological conditions for listed species is also included as a project objective. We have reviewed the document with those objectives in mind, and have the following comments:

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Wildlife

We have reviewed the wildlife sections of the IS/MND and relevant supporting documents, and find that the descriptions of existing conditions, potential impacts, and mitigation measures for wildlife resources are thorough and adequate, with one exception, that being the inclusion of salmonids in the special-status wildlife section as described in comment #1 below. We note, in particular, that the proposed elimination of equestrian use on Buck Gulch Falls Trail; realignment/relocation, narrowing, stabilization, resurfacing, and improved stream crossings (bridges); along with the proposed decommissioning and restoration of streamside social trails, would provide substantial beneficial impacts to aquatic and terrestrial wildlife habitats and species in the project area on a long-term basis.

1. Potential for Salmonid Species in Arroyo de San Jose Creek

The IS/MND does not include salmonids in the Special Status Wildlife section; in our view this is a mistake. The IS/MND should be amended to include salmonids in this section for the following reasons. Several reports referenced in the IS/MND describe Arroyo de San Jose Creek as providing habitat or potential habitat for listed salmonid species, especially steelhead trout (*Oncorhynchus mykiss*). The 2026 PCI Ecological Buck Gulch Falls Creek Restoration and Trail Improvement Project Biological Resources Evaluation references the 2005 report Historical distribution and current status of steelhead/rainbow trout (*Oncorhynchus mykiss*) in streams of the San Francisco Estuary, California" (Leidy et al.). This document reviews Arroyo San Jose and finds, "This relatively small watershed has been found to support multiple age classes of *O. mykiss* in the past and recent observations of adult spawners suggest current use, although successful hatching and rearing of juveniles has not been verified" (p.171). Also referenced is the 2009 California Department of Fish and Wildlife (CDFW) *Arroyo San Jose Creek Stream Habitat Assessment Report*, the objective of which is to "document the current habitat conditions and recommend options for the potential enhancement of habitat for Chinook salmon, Coho salmon, and Steelhead trout" (p.2). The report states "Arroyo San Jose should be managed as an anadromous, natural production stream" (p.9), and goes on to make recommendations such as increasing woody cover, adding structures to increase the number of pools, and assessing roads and trails for fish passage access. Given the past occurrence of salmonids in Arroyo de San Jose Creek, the IS/MND should include these species in the Special-Status Wildlife section and consider incorporating measures recommended by CDFW.

2. California ash (*Fraxinus dipetala*) in Streambank Stabilization Revegetation Plan

California ash (*Fraxinus dipetala*) is included in the planting plan for streambank stabilization (Figure 10 in the IS/MND and Sheet 5 of the PCI Ecological *Buck Gulch Falls Trail Arroyo San Jose Streambank Stabilization* plan set). This tree species is not found in Marin County, but is found in Napa and Sonoma counties, according to Calflora and Calscape websites and Marin Flora (Howell et al., 2007). Oregon ash (*Fraxinus latifolia*) is common in riparian areas in Marin, including in Ignacio Valley Preserve, and may be a better choice unless there are other considerations, such as disease or pest susceptibility, to consider. Given that the California ash is not found in Marin, please provide an explanation of why California ash rather than Oregon ash is included in the revegetation plan.

3. Correction of Factual Error: Change in Trail Use

On page 98 of the IS/MND, the first sentence of the second full paragraph following the bulleted items under Mitigation Measure Bio-3: Bat Protection reads as follows: "The proposed change in use on Buck Gulch Falls trail would eliminate bicycle and equestrian use and limit use to pedestrians only."

(Underlining added for emphasis) This is factually incorrect as stated and is misleading to readers of the IS/MND who may not be familiar with Buck Gulch Falls Trail, because bicycles are currently not allowed on this trail.

4. Hydrology: Stream Channel Incision

The 2026 PCI Ecological *Buck Gulch Falls Creek Restoration and Trail Improvement Project Biological Resources Evaluation* notes that “areas of deep incision and bank erosion are evident throughout the project area reach, especially at the downstream limits” (p.15). The proposed project includes stream bank stabilization at the area of most extreme erosion, and revegetation of the stream banks, both of which will reduce erosion and slow incision. However, these approaches may not be sufficient to address incision. We recommend that measures to address incision be considered to protect riparian habitat. Where project elements are installed in the stream channel there may be relatively easy opportunities to add grade control features to address incision.

Thank you again for the opportunity to comment on this IS/MND. We appreciate the effort MCOSD staff have made to focus on natural resource protection and habitat enhancement along Arroyo de San Jose Creek and the Buck Gulch Falls Trail. We think the proposed project is an opportunity to repair damage to a well-loved site while allowing for continued recreation. We are happy to be available for consultation as MCOSD staff continue to work on the proposed project.

Sincerely,



Rebecca Schwartz Lesberg
Executive Director

Principle authors and co-signers:



Caroline Christman, MCL Parks & Open Space Committee Chair



Carolyn Shoulders, MCL Board Member, Restoration Ecologist



Greg R. Zitney, MCL Board Member, Certified Wildlife Biologist®

References:

California Native Plant Society. Calscape. (2026). Retrieved July 23, 2026 from
[https://calscape.org/Fraxinus-dipetala-\(California-Ash\)](https://calscape.org/Fraxinus-dipetala-(California-Ash))

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