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From: Tom Boss <tom@marinbike.org>

Date: Tue, Jan 14, 2014 at 11:31 PM

Subject: Road and Trail Management Plan revisions

To: dweinsoff@townoffairfax.org, lbragman@townoffairfax.org, reed@townoffairfax.org, rgoddard@townoffairfax.org, bcoler@townoffairfax.org

TOWN OF FAIRFAX

Dear Mayor Weinsoff and Council members,

I recently learned that the Council plans to send a letter to Marin County Parks regarding the Draft Road and Trail Management Plan (RTMP) and PEIR and I wanted to bring a few things to your attention. The Marin County Bicycle Coalition (MCBC) has been involved in the process for over two years and while we have concerns with the Draft documents (see our attached comment letters), we do feel the process has been transparent and inclusive. We have also witnessed Parks respond to previous concerns and have no reason to doubt that they won't continue to evolve the documents based on public input.

After a heated meeting in late November and negative press that followed, Marin County Parks has announced a special presentation at the January 23 Parks and Open Space Commission meeting to summarize public comments received since release of the Draft Road and Trail Management Plan (RTMP) on October 1, 2013, outline proposed revisions to plan to address concerns raised, clarify certain elements of the plan, and describe the process to implement the plan.

I sit on the Marin Conservation League's Parks and Open Space Committee and Carl Somers and James Raives of Marin County Parks attended our January meeting. They gave an overview of revisions to the RTMP they are considering in response to 200 comment letters and reactions at the November Parks and Open Space Commission meeting.

They are considering significant revisions to the Zones including:

- Soften the lines between Zones so trail policies are more flexible
- Remove most policies from the Zones and instead rely on the proposed system polices
- Collapse Zones 2 and 3 into a single zone
- Change the name "Zones" to "Areas"

They are considering additions to the trail evaluation matrix to broaden its ability to balance social needs and sustainability. They also spoke of defining the RTMP as more of a process than a plan and Parks will outline the "next step", which includes public meetings region by region to discuss what trails to construct, rebuild, adopt or decommission.

These and other revisions will be publicly announced at the January 23 Parks and Open Space Commission meeting.

WHAT: Marin County Parks and Open Space Commission

WHEN: Thursday, January 23, 2014 at 2:30 pm

WHERE: Marin County Civic Center, Board Chambers, Room 330

I have participated in over 20 meetings and site visits related to the RTMP and would be happy to answer any questions you may have.

Regards,
Tom

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SUPP. TO
AGENDA ITEM # 4



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James Raives
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December 2, 2013

Dear James,

The Marin County Bicycle Coalition (MCBC) appreciates the opportunity to comment on the District's Draft Road and Trail Management Plan (DRTMP, or Plan) and its accompanying Draft Tiered Programmatic Road and Trail Management Plan (DTPEIR, or EIR). MCBC represents 2,500 annual contributing bicyclists in Marin as well as cyclists across the Bay Area and elsewhere who enjoy cycling throughout Marin's beautiful landscapes. In 2012, we initiated our Off-Road Program, which has the following goals:

- Improve opportunities for mountain bike access to singletrack and multi-use trails by working with Marin County Parks, Marin Municipal Water District, California State Parks, Golden Gate National Recreation Area, and Point Reyes National Seashore to provide bike-friendly trails within and connecting these public lands.
- Educate all trail users to have friendly and responsible interactions on trails and fire roads.
- Build strong partnerships with land management agencies, environmental and equestrian groups, and the NorCal High School Cycling League to strengthen stewardship of trails and roads, and help protect and restore sensitive habitat.

We share the District's goal of fostering a road and trail network that welcomes public recreation and education while protecting environmental quality, and view the Plan as an important step towards making that goal a reality. In this time of thanksgiving, we're grateful that the District has spent the last three years implementing a very transparent and public Plan development process. MCBC is proud to be an active partner of the District, as MCBC members (including members of our Off-Road Committee) have participated in each and every public workshop held on the Plan since 2010. We wrote extensive comments on the Preliminary Draft Plan released in October 2012, and were happy to see that many of our comments were addressed when the updated Draft Plan was released in September 2013. It is our hope that this set of comments will be similarly considered during development of the Final Plan and EIR.

In our previous conversations, you have told us that it would be most helpful if we developed separate comment letters for the Plan and EIR. This letter focuses on our comments/proposed revisions to the EIR; we have prepared a separate comment letter on the Plan that we are submitting in parallel.

We have two types of comments on the EIR: general comments on the EIR's composition and approach to impact assessment and mitigation, and specific comments on language in the chapters. Page numbers refer to the page of the PEIR, unless otherwise noted to refer to a page number in the Plan.

General Comments

GC-1: Self-mitigating Approach to Impact Assessment. The EIR implements a “self-mitigating” approach to impact assessment and mitigation; because it is a programmatic document, it presumes that implementation of the Plan as proposed would automatically result in less than significant impacts to the environment (which includes the social environment – e.g. recreation – as well as the natural environment). While this approach is certainly not uncommon, it is optimistic at best, and hand-waving at worst, because it does not clearly define a vision for what the road and trail system will look like in 15 years. It is not clear to us why the approach recently implemented by California State Parks in their Programmatic Environmental Impact Report on Changes in Trail Use, certified in May 2013¹, was not implemented instead. We have been told that the road and trail design and engineering standards and Best Management Practices (BMPs) referenced in Chapter 6 of the Plan (page 6-1) are incorporated by reference, but this is not made clear on pages 3-36 and 3-37 of the EIR’s Project Description (PD). We recommend revising the language in the PD to make the incorporation of the approved standards and BMPs more clear. We also recommend that the District explicitly reference the road and trail design and engineering standards and BMPs listed in the Parks PEIR. The Parks PEIR contains a meticulously researched and field-tested set of standards for road and trail construction, maintenance, and management that protect environmental quality, user safety, and recreational access in California’s unique landscapes, including state parks in Marin County, and as such is an exceptionally appropriate document to reference and incorporate.

GC-2: Documentation of Public Process. Despite the robust and lengthy public process that went into development of the Plan and EIR (four public scoping workshops, one public scoping meeting, five community workshops, public review of the TPEIR’s Notice of Preparation, multiple public meetings/presentations to the Board of Supervisors and the Parks and Open Space Commission, and public review of the October 2012 Preliminary Draft Plan), almost none of this process is documented within either document. The EIR makes brief references to the public process in Chapter 1 and the visitor census and survey in the PD (pages 3-17 and 3-18), but the latter material only mentions users’ existing usage patterns – not the desired conditions and experiences that were expressed during the community workshops and documented in responses to the Preliminary Draft Plan. The Final Plan should include this information so that current and future District staff (as well as current and future users themselves) can understand the social context of the Plan and EIR, and how the public process shaped its final form. Appendix B of the PEIR should be revised to include this information, as well as the comment letters the District received on the Preliminary Draft and Draft Plans.

GC-3: Clarification of Goals and Objectives. The PEIR lists the goals of the Plan on page 3-15, followed by a list of objectives. The Plan itself references a much broader range of guidance, including “measures of success” on Plan page 1-5, its “guiding principles” on Plan page 4-9, and its “interests and concerns” on Plan page 4-10. The objectives as described in the PEIR appear to be an incomplete amalgamation of the Plan’s measures of success, guiding principles, and interests and concerns; the precise list presented in the PEIR is not in the Plan. In general, the Plan’s measures of success, guiding principles, and interests and concerns are simultaneously more specific (i.e., they address specific areas of concern) and more broad (i.e., cover a wider range of issues) than the PEIR’s goals and objectives, and only the “measures of success” could be considered *operational objectives* that are somewhat measureable and/or quantifiable.² It is not clear which set of elements defines the standards against which the future road and trail network will be compared. We recommend re-organization of these elements so that the goals and operational objectives of the PEIR are abundantly clear, and so that the latter is genuinely measureable.

¹ http://www.parks.ca.gov/?page_id=26278

² Please see our comment letter on the Plan for more discussion of measures of success and operational objectives.

GC-4: Addition/Rewording of Goals. As we have stated in past comment letters, one of the primary sources of user conflict and frustration in Marin County is the lack of legal narrow-trail or “singletrack” riding opportunities relative to the size of the local mountain biking community. By the District’s own data, mountain bikers comprise roughly a quarter of the District’s recreational users (page 3-18), yet have legal access to a far smaller proportion of trails. Mountain bikers’ legal access to fire roads in the District and elsewhere is often cited as a reason why our community should be content with historically disproportionate legal trail access, but mountain bikers prefer trails to fire roads for the exact same reasons hikers, dog walkers, equestrians, and other user groups do: to be closer to nature, enjoy the shade on a hot summer day, and utilize a less steep and difficult route between hills and valleys (given that most fire roads are relatively steep due to their genesis as ranching roads that were typically accessed via motor vehicles).³ This is an important component of the public use context, and one that we hope to see addressed by the Plan, its PEIR, and its subsequent public process. For this reason, we request that one of the Guiding Principles for Managing Roads and Trails on the MCOSED Preserves (Plan page 4-9) is elevated to a goal of the Project Description in the PEIR (page 3-15): *“The road and trail system will provide a fair, desirable, and appropriate range of recreation opportunities—and associated infrastructure—for visitors to enjoy the preserves.”* Making this an explicit goal of the project will go a long way towards helping the District achieve its stated primary goal to *“improve the visitor experience and visitor safety”* of all users, including the mountain bike community. In addition, the goal of “improve the visitor experience” should be revised to state “improve the visitor experience and visitor safety while addressing changing patterns in visitor use” to address the Plan and PEIR’s commitment to address current and anticipated future changes in the Marin recreational community.

Chapter Comments

Chapter 3: Project Description

3-1: Page 3-16: The first paragraph under “Road and Trail Assessment” describes non-system trails as *“social and illegal alignments created by users.”* By the District’s own admission on page 3-14, most of the roads and trails on District preserves were inherited, and existed before the properties were acquired by the District and subject to District policies. The use of the term “illegal” should therefore only be applied to specific trails that are known to have been constructed after acquisition of the property in question by the District.

3-2: Page 3-17: The last paragraph under “Road and Trail Assessment” states that *“systemwide, almost one-third of the roads and trails on the preserves are redundant.”* The concept of road and trail redundancy is emphasized throughout the Plan and its accompanying EIR (see the Systemwide and Zone-Specific Policies on pages 3-24 through 3-32) to make the case that roads and trails that take different routes to the same location are by definition unnecessary and a target for decommissioning. The fact that 27% of roads and trails throughout the system are redundant is used on Page 3-20 of the Plan to imply “that there is ample opportunity for potentially decommissioning [roads and] trails...” This is a very problematic concept for a number of reasons:

- It implies that a route’s value and purpose lie primarily in its destination, not the method the route takes to get from point A to point B.⁴

³ For example, no hiker in their right mind has ever said “I really prefer hiking Luiz Fire Road to Big Rock Trail.”

⁴ More poetically inclined people would say “it’s about the journey, not the destination.”

- It ignores that by definition, multiple trails that lead from one destination to another constitute a loop (which is particularly problematic given that later language in Chapter 4 emphasizes the value of loop trails).
- It ignores that the decommissioning of many of these routes, particularly fire roads, is infeasible due to their use by power, water, and other utilities, fire districts, and other municipal agencies. Indeed, if so many roads were truly redundant and unnecessary, one suspects that many of them would have long ago passively converted to trails, like many of the late 19th and early 20th century logging roads that once criss-crossed Marin County.⁵ This point is underscored by language on page 3-18 of the PEIR that states that *“Pacific Gas and Electric (PG&E), AT&T, the Marin Municipal Water District, and the North Marin Water District operate and maintain facilities within the MCOSD preserves that require year-round access over preserve roads, including all 113 miles of fire roads, although some access is restricted by the MCOSD during the wet season”* [emphasis added]. Only Region 6 includes fire roads that are not used by any utility service providers (Plan page 3-80); the only preserve with commonly publicly accessed roads and trails in this region is Ring Mountain OSP.
- It fails to acknowledge that having multiple routes between the same destinations can provide opportunities to spatially separate different user groups when the trail alignment is not conducive to multiple uses at the same time. For example, redundant trails near horse stables can provide opportunities to separate equestrians and their unique safety need, from other trail users, while maintaining recreational access for other user groups.
- It is inconsistent with Goal L-2.6 of the 2008 Marin County Parks and Open Space Strategic Plan, which instructs the District to *“Provide Multiple Access Points. Design trails with multiple access points to maximize accessibility and minimize concentrating access.”*
- It merges roads and trails as one facility type, which is inconsistent with the classification scheme presented in the November 2009 trail workshop (i.e. fire/service roads, multi-use trails, and narrow/single-track trails) and the corresponding differences in widths, gradients, and other characteristics of these facilities.

We understand that in some cases, redundant roads and trails that not environmentally sustainable can be appropriate targets for decommissioning. However, when considering the public use context of such a road/trail, rehabilitation or reconstruction may be a better option to avoid conflict, improve safety, and improve the user experience. We strongly suggest that the District reduce or eliminate language in the PEIR that references road/trail redundancy to acknowledge the above bullet points, and de-emphasize road/trail redundancy as driver for decommissioning.

3-3: Page 3-17: The “Road and Trail Assessment” should be significantly revised to summarize the information presented in Chapter 3 of the Plan, including road and trail distances, types, and conditions by preserve and by region. Not including this information makes it difficult to interpret the following chapters of the PEIR.]

3-4: Page 3-18: Table 3.1 should be revised to provide a more comprehensive summary of public use by the 14 preserves that were surveyed, instead of simply discussing which preserves ranked in the top

⁵ Contour Trail in Gary Giacomini OSP is an example of this type of passive conversion from former logging road to trail. The bench width of Contour Trail is roughly that of a fire road, but since the cessation of logging activities, vegetation has encroached on the bench such that the unvegetated portion is the width of a trail.

three for particular uses. Knowing which preserves had the least surveyed amount of certain types of uses can be as useful to the reader as knowing which preserves had the most.

3-5: Page 3-18: Under “Visitor Experience” in Table 3.1, 94% of visitors rated their interactions with other preserve users as “great” or “good”. We point this out to emphasize that while reducing conflict between users is an appropriate and justified goal of the Plan and its PEIR, it may not be the persistent and widespread problem that some perceive it to be. It also underscores the effectiveness of existing educational and outreach programs implemented by the District, other local land managers, and advocates such as MCBC. MCBC is a proud sponsor of a program that brings together young mountain bikers from the NorCal High School Cycling League and local equestrians to educate these groups about each others’ safety needs. It is our firm belief that programs such as this are just as important to reducing user conflict and improving safety than any physical changes that are made to the road and trail system.

3-6: Pages 3-19 through 3-20: The District should provide a more detailed vision for the desired future conditions in each of the zones. Given that the zones are based in part on environmental conditions, and that one of the primary goals of the Road and Trail Management Plan and its accompanying PEIR is to reduce the environmental impacts of the road and trail system, for each zone the desired future condition should describe the desired environmental improvements. As currently stated, the desired future conditions for each zone are vague, and do little to either (1) relate each zone’s environmental context with its zone-specific management policies, or (2) differentiate the zones from each other. For example, it is not a coincidence that all Zone 1 areas (Bollinas Lagoon OSP, and portions of Gary Giacomini and Cascade Canyon OSP) have sensitive aquatic habitats with listed species downstream, but this is not discussed at all in the description of Zone 1.

To make the desired future outcomes of the zone-specific management policies more clear, we suggest language revisions that differentiate between minimizing, reducing and maintaining⁶ pre-Plan levels of impacts of the road and trail system on target environmental conditions:

- **Zone 1:** Visitors perceive and experience a minimally disturbed natural landscape, with few or infrequent encounters with others (unless traveling in a group), opportunities for solitude, and wildlife viewing. Areas in this zone are typically accessed for recreation only after first traveling for some distance, and/or passing through adjacent non-District lands or District lands in Zones 2, 3, or 4. The road and trail system is managed to minimize (to the greatest extent feasible) erosion and sediment release into downstream salmonid-bearing streams and other sensitive aquatic habitats, avoid rare plant communities, minimize opportunities for roads and trails to serve as colonization pathways for invasive plants and noxious weeds, and maximize contiguity with adjacent large open spaces managed by other agencies.
- **Zone 2:** Visitors perceive and experience easy access to a natural landscape, with more frequent encounters with others than in Zone 1. Opportunities for solitude and wildlife viewing, while possible, are not as frequent as in Zone 1. Areas in this zone are moderately accessible for recreation, and are often accessed by traveling through District lands in Zones 3 or 4. The road and trail system is managed to reduce (relative to pre-Plan conditions) erosion and sediment release into downstream aquatic ecosystems, avoid or minimize disturbance to rare plant

⁶ In this context, “maintain” = “prevent from getting worse.”

communities, and reduce opportunities for roads and trails to serve as colonization pathways for invasive plants and noxious weeds.

- **Zone 3:** Visitors perceive and experience a primarily natural but actively managed landscape with the potential for frequent encounters with others. Opportunities for solitude and wildlife viewing may be compromised. Areas in this zone are very accessible for recreation. The road and trail system is managed to maintain or reduce (when feasible, relative to pre-Plan conditions) sediment release into downstream aquatic ecosystems, minimize disturbance to rare plant communities, and maintain or reduce opportunities for roads and trails to serve as colonization pathways for invasive plants and noxious weeds.
- **Zone 4:** Visitors perceive and experience an actively managed landscape and should expect frequent encounters with others, with little to no opportunities for solitude and limited opportunities for wildlife viewing. Areas in this zone are highly accessible for recreation, and may have characteristics of a developed/disturbed landscape. The sights and sounds of others and the built environment are present. The road and trail system is managed to prevent pre-Plan levels of downstream sediment release and invasive/noxious weed populations from becoming worse.

The increased clarity provided by these (or similar) revisions feeds directly into our suggestions for more useful zone-specific policies for visitor use management described in comment 4-12 below.

3-7: Page 3-26: Policy T1d should be revised to state *“The MCOSD will permit bicycling and saddle animals on trails designated and signed for their use, including (a) existing trails known from the Dec. 2011 inventory, (b) new trails that the MCOSD builds and designates for shared use, and (c) existing trails on newly acquired lands, when compatible with natural resource protection and the safety of trail users.”* As currently written, the language for T1d excludes existing trails on existing MCOSD lands, which is inconsistent with existing conditions and prevents existing trails (whether currently system or non-system) from being designated in the future for bicycling or saddle animal use. The current language for T1d also places it in conflict with the “Management Actions” section on page 3-35, which describes *“changing the types of permitted recreational activities (e.g. pedestrian travel, equestrian use, or mountain biking) along a road or trail”* as a type of potential project under the RTMP.

3-8: Page 3-27: Policy SW.3, Prohibition on Off-Road or Off-Trail Equestrian Use, should be revised to state *“Horses and pack animals must stay on system roads and trails designated for their use, except when watering or resting the animal...”* This revision makes the language in SW.3 more consistent with the language of Policies T1d and SW.4 as well as the language in the zone-specific policies in Table 3-3.

3-9: Page 3-28: Policy SW.13, Prohibition of Uses, should be revised to state *“...Examples of areas where this policy may apply include those proximate to schools and other areas with large numbers of children on foot and on bikes, stables and other areas traditionally heavily traveled by equestrians, or areas of significant habitat value.”* This revised language considers the county’s Safe Routes to School program, which encourages kids to commute to school by walking or bicycling instead of by car.

3-10: Page 3-28: Policy SW.14, Displacement of Existing Users states *“The MCOSD will strive to prevent displacement of equestrians and pedestrians when accommodating new mountain bicycle trail connections and riding opportunities.”* MCBC supports this policy, but it could be confusing when adopting non-system trails with historic use, such as old skid roads in the Gary Giacomini OSP that are shared by mountain bikers, hikers, and equestrians with little incident. We suggest revising the policy to

add that “MCOSD will also strive to prevent displacement of cyclists when decommissioning roads and trails; this policy does not apply to trails that MCOSD decides to adopt that have historically been used by mountain bicyclists.”

3-11: Page 3-28: Per comment 3-2, the emphasis on eliminating redundant roads and trails in Policy SW.16 is not very useful given the inherent value in “redundant” trails and the practical challenges of decommissioning. We recommend that the District eliminate this policy, as any given road or trail segment that “has the worst overall condition, presents the highest maintenance costs, or contributes to the most environmental effects” regardless of its redundancy status is likely to be rehabilitated, rerouted, or decommissioned anyway given the suite of Plan tools and policies that are aimed at reducing the environmental impact of the overall road and trail system.

3-12: Page 3-28: Policy SW.25, Decommission Nonessential Roads, should be revised to state “*Nonessential roads in the interiors of the preserves will be decommissioned or converted into trails to increase habitat connectivity and reduce the potential for invasive species...*” Per comment 3-2, while road decommissioning is highly unlikely, this revised language gives the District flexibility to implement road-to-trail conversions that would maintain or even enhance recreation use values while decreasing environmental impacts.

3-13: Page 3-29: Policy SW.27, Remove or Realign Roads and Trails Away From High-Value Cultural and Historic Resources, should be reconsidered in light of the educational value that these resources can provide. Properly managed historic and cultural resources can serve as a destination for trail users, and the District should take care to differentiate between those resources that can be safely and sustainably enjoyed by road and trail users, and those that cannot.

3-14: Page 3-29: Policy SW.30, Floodplain Policy for New and Improved Roads, Trails, and Associated Facilities, should be revised to consider “*potential flood and sea level rise impacts to any proposed new or improved road, trail, or associated facilities...*” This would help make the policies in the Plan more consistent with regional guidance from BCDC, the US Army Corps of Engineers, and other agencies regarding current and potential future flood risk.

3-15: Pages 3-30 through 3-32, Table 4.2: As discussed above in comment 3-6, the zone-specific policies as currently written do not adequately define the environmental context of each zone or describe the connection between zone-specific management policies and desired environmental outcomes. Much of the language in Table 3-3 is repeated between zones, blurring the differentiation between the zones and making it unclear why they exist in the first place. We recommend that the language in Table 3-3 describing the “Road and Trail Management Emphasis” (row 1) of each zone be revised per our suggested language in comment 4-3. Consistent with this language, we recommend that the language describing the “Policies Regarding New Roads and Trails” (row 2) be revised to be more specific, and to reflect the enormous amount of effort the District, its staff, and its contractors have put into assessing the District’s road and trail network (details of these suggested revisions are below).

It should be obvious by now that across a broad range of users, one of the most problematic elements of the Plan and its accompanying PEIR is the use of decommissioning ratios to permit construction of new trails.⁷ At first glance, the ratios are indeed a mathematically simple way of *decreasing* the mileage

⁷ While the ratios technically apply to new roads and trails, it’s highly unlikely that new fire roads are necessary on existing District lands, so our discussion in this comment focuses on trails.

of the entire road and trail network (including all of the non-system trails that were included in the December 2011 assessment), while *increasing* the mileage of system-designated roads and trails that are well-designed, safe, sustainable, and impart minimal impacts to the environment. On a practical level, however, these ratios are much more difficult to implement, for a variety of reasons:

- They presume that there is adequate funding and/or acreage to implement decommissioning, particularly at the 2:1 ratio that is proposed for Zone 1 (which comprises 16% of all preserve lands). What if there is only enough funding or acreage to decommission roads/trails at ratios of 1.2:1 in Zone 1, or 0.6:1 in Zones 2 through 4? The ratios tie the District's hands and reduce its flexibility to consider site-specific opportunities and constraints.
- Though the ratios apply to acreage, implying that fire roads could serve as a "decommissioning bank" to permit a relatively longer length of narrower trail, there are multiple, significant obstacles to fire road decommissioning (as previously discussed in comments 3-3 and 4-8). It is unlikely that fire road decommissioning will be able to happen at a scale that would permit any notable length of compensatory trail construction.
- The ratios focus solely on decommissioning, and exclude consideration of road to trail conversions, rehabilitation, reconstruction, and other tools that could result in similar improvements to environmental conditions such as erosion and habitat fragmentation.
- The ratios are implemented independently from the significant amounts of data on vegetation, natural communities, and road/trail conditions that the District collected as part of the RTMP and VBMP. In other words, they substitute acreage as an across-the-board surrogate for environmental impacts, when in reality those impacts are highly site-specific and dependent on a host of physical, biological, and social factors.

We believe that there is a better way to implement zone-specific management policies for new trails that are based in reality, not theory, and that will be more effective at both reducing the environmental impacts of the road and trail network while addressing the changing recreational needs of a growing Marin community. We suggest replacing the ratio language with the following language:

- **Zone 1:** Construction of new trails will be permitted only where the net adverse environmental effect would be reduced, to enhance environmental protection, or if necessary to achieve critical connections within the overall road and trail system. Construction of any new trail will require compensatory work in the same watershed such that there is an anticipated net reduction in sediment release from the new trail and existing roads and trails. New trail construction will avoid rare plant communities, and include provisions for active management for at least 3 years post-construction to prevent/minimize the establishment of non-native species and noxious weeds along the trail corridor. New trails will be aligned to minimize intrusion into sensitive wildlife habitat and preserve contiguity with adjacent open space parcels.
- **Zone 2:** Construction of any new trail will require compensatory work in the same watershed such that there is an anticipated net reduction in sediment release from the new trail and existing roads and trails. New trail construction will avoid or minimize disturbance to rare plant communities, and include provisions for active management for at least 2 years post-construction to prevent/minimize the establishment of non-native species and noxious weeds along the trail corridor. New trails will be aligned where feasible to minimize intrusion into sensitive wildlife habitat.

- **Zone 3:** Construction of any new trail will require compensatory work in the same watershed or elsewhere in zone 1, 2, or 3 such that there is no anticipated net increase in sediment release from the new trail and existing roads and trails in the watershed or zone. New trail construction will avoid or minimize disturbance to existing native plant communities, and include provisions for active management for at least 1 year post-construction to prevent/minimize the establishment of non-native species and noxious weeds along the trail corridor. New trails will be aligned where feasible to minimize intrusion into wildlife habitat.
- **Zone 4:** Construction of any new trail will require compensatory work in the same watershed or elsewhere in zones 1 through 4 such that there is no anticipated net increase in sediment release from the new trail and existing roads and trails in the watershed or zone. New trail construction will minimize disturbance to existing plant communities, and include provisions to establish native plant communities and minimize weed establishment whenever feasible.

Similarly, much of the language in “Policies Regarding Existing Roads and Trails” (rows 3 through 6 in Table 3-3) is repetitive and non-specific, and once again relies on an unreliable tool (decommissioning) to reduce environmental impacts. We suggest that the language in this section is revised as follows:

- **Zone 1:** Road and trail conditions will be improved to protect and, where possible, enhance sensitive resources, reduce maintenance requirements, and support low to moderate levels of recreational use. Existing roads and trails that are classified as Poor or Fair-Poor will be rerouted, rehabilitated, or, if absolutely necessary, decommissioned such that their condition is improved to at least Fair. Necessary roads and trails will be rerouted outside stream conservation areas unless no feasible alternative is available for that segment.
- **Zone 2:** Road and trail conditions will be improved to protect sensitive resources, reduce maintenance requirements, and support moderate to high levels of recreational use. Existing roads and trails that are classified as Poor or Fair-Poor will be rerouted, rehabilitated, or, if absolutely necessary, decommissioned such that their condition is improved to at least Fair. Necessary roads and trails will be rerouted outside stream conservation areas unless no feasible alternative is available for that segment.
- **Zone 3:** Road and trail conditions will be improved to protect existing resources, reduce maintenance requirements, and support moderate to high levels of recreational use. Existing roads and trails that are classified as Poor and Fair-Poor will be rerouted or rehabilitated such that their condition is improved to at least Fair-Poor and Fair, respectively. Necessary roads and trails will be rerouted outside stream conservation areas unless no feasible alternative is available for that segment.
- **Zone 4:** Road and trail conditions will be improved to protect existing resources, reduce maintenance requirements, and support high levels of recreational use. Existing roads and trails that are classified as Poor and Fair-Poor will be rerouted or rehabilitated such that their condition is improved to at least Fair-Poor and Fair, respectively. Necessary roads and trails will be rerouted outside stream conservation areas unless no feasible alternative is available for that segment.

For all zones, at-grade stream crossings should be minimized.

3-16: Section 3.7 of the document should include a list of the environmental, physical, and social criteria that are utilized in the decision-making process (Table 5.1 in the Plan). This list should be amended to include the following social criteria:

- **User groups.** Who would be able to access a road or trail, and how would that access contribute to a “fair, desired, and appropriate” range of recreational opportunities for all user groups?
- **Suitability for single-use or multi-use.** Would the project be suitable to support multiple user groups at once? If not, could a range of single-use strategies be employed in a way that enhances access opportunities and improves safety for all user groups?
- **Historic use.** What are the historic use patterns of the road or trail, and would they be affected by the proposed project?
- **Accessibility.** How would users access the trail? Can the road or trail only be accessed by car, or can it be accessed on foot/bike/horse from adjacent neighborhoods? Is the road or trail accessible by public transit?

We recommend inclusion of these criteria to address some of the most pressing social issues related to road and trail access on District lands.

3-17: Pages 3-26 through 3-27: As discussed above under General Comments, Section 3.8 should incorporate by reference the exhaustive list of road and trail design and engineering specifications, Best Management Practices (BMPs), and mitigation measures that are outlined in California State Parks’ Programmatic Environmental Impact Report on Changes in Trail Use.

Chapter 4: Introduction to Impact Analysis

4-1: Table 4-3 describes the Systemwide Policies Affecting the Intensity of Future Road and Trail Management Activities and Visitor Use, but nowhere in the table or elsewhere in the PEIR are policies proposed that would call for regularly-scheduled assessments of how District lands are being used. Without such assessments, it is not clear how the District would anticipate and proactively plan for (instead of *react to*) the future demand for access. We recommend that the District implement road/trail use surveys (similar to the one done for this Plan) every 5 years as a new systemwide policy.

4-2: Page 4-11: Much of the language in the section on “Existing and Future Intensity of Use from RTMP Activities” clouds or obscures not only the purpose of the RTMP but the reasons that many Marin County voters used to justify voting for Measure A. The statement that *“Because the RTMP does not mandate or encourage an increase in maintenance activities, there would be no change in the intensity of maintenance attributable to the implementation of the RTMP”* would likely come as a surprise to the majority of Marin County citizens who thought that a vote for Measure A was a vote for a more sustainable road and trail system, given the increased funding that would be available to implement road and trail management and maintenance. This statement also conflicts with the analysis of the “No Project” alternative in Chapter 15, which states that the No Project Alternative *“would not include any of the new policies and implementation programs designed to address the environmental impacts of continued maintenance and the development of new roads or trails.”*

The section continues to state that typically, *“those roads and trails subject to decommissioning would be those that generate adverse environmental effects due to their location or construction, or those that are most costly to maintain.”* This conflicts with guidance elsewhere in the PEIR and Plan that focus decommissioning on “redundant” roads and trails, or blanket zone-specific management policies that

call for the decommissioning of all roads and trails in Zones 1 and 2 “unless no other option is available to maintain or establish a necessary road/trail connection.” The language elsewhere in the Plan and PEIR should therefore be revised to state that only roads and trails that generate adverse environmental effects due to their location or construction, or those that are most costly to maintain, will be the focus of decommissioning. This is consistent with our proposed revisions to the zone-specific management policies set forth in Table 3-3 of the PEIR and 4.2 of the Plan.

The 4th paragraph of page 4-11 states “*Areas designated as Zone 1 would likely see a decrease in road and trail mileage and area, and Zones 2-4 would see no increase in road and trail mileage and area with implementation of the RTMP due to offset requirements.*” This language does not differentiate between system and non-system trails, and we suspect that it is this language (repeated and referenced in multiple locations throughout the PEIR) that is a cause of concern for so many users of District lands. We suspect that the RTMP will ultimately be applied in a manner that *decreases* the overall mileage of the road and trail network – including system and non-system trails – while increasing the mileage of environmentally sustainable, system-designated roads and trails throughout the preserves such that there is a net reduction in environmental impacts from all roads and trails. This is the vision that Marin County voters supported when they approved Measure A. In this fashion, the overall road/trail network mileage will *decrease*, but the system mileage will ideally *increase*, or at the very least stay the same. The PEIR authors must be careful to differentiate between the effects of the RTMP on the mileage of the overall network vs. the mileage of the system network throughout the document, as there are multiple references to “decreasing the mileage of the road and trail network” that the reader would otherwise perceive as directly in conflict with Policies TRL1-1 and TRL1-2 of the 2007 Countywide Plan: Protect the Existing Countywide Trail System, and Expand the Countywide Trail System.

Finally, the last paragraph in this section states that “no policies contemplate or require an expansion of facilities to serve an increased number of visitors.” This is a peculiar statement given the population growth experienced by the Bay Area in recent history. While population growth in Marin is indeed slower relative to other Bay Area counties, largely as a result of local policies governing open space protection, land use, and zoning, the amount of local and regional residents that will want to access District lands and facilities will only grow. It seems irresponsible to develop a Plan that is aimed at addressing the current and future recreational needs of District users, without acknowledging or preparing for that community’s growth. If the size of the user community grows, and the road/trail network does not grow with it, then existing facilities will experience an increased level of user pressure that could result in adverse impacts to the environment, the user experience, and user safety. We recommend that the District re-consider and re-write this section and subsequent analyses so that the Plan and PEIR adequately prepare for the potential expansion of facilities to serve an increased number of visitors.

Chapter 11: Hydrology and Water Quality

11-1: Page 11-35 and Figure 11-6: The list of preserves that are partially or completely within the 100-year flood zone as defined by FEMA does not include Rush Creek OSP or Deer Island OSP. Both of these preserves either contain or share immediate, unprotected boundaries with flood basins that are mapped within the FEMA 100-year base flood hazard zone, and are likely subject to an increased risk of inundation with sea level rise and the changes in flood frequency/intensity/duration associated with climate change. Rush Creek OSP in particular contains roads and trails that are subject to inundation by sea level rise. Both Rush Creek and Deer Island preserves should be included in the list on page 11-35. In addition, the BCDC map in Figure 11-6 does not include the northern portions of Marin County that

contain the Rush Creek, Deer Island, and other preserves. This map should be re-developed using shapefiles publicly available from BCDC and the Pacific Institute⁸ that describe anticipated inundation due to sea level rise.⁹

Chapter 15: Alternatives Analysis

15-1: Page 15-2: Section 15.3 appears to accidentally call the goals of the Plan the “primary objectives”, further muddling the goals and objectives of the Plan and the PEIR per our earlier comment GC-3. This list should be re-named as “goals”, and *“The road and trail system will provide a fair, desirable, and appropriate range of recreation opportunities—and associated infrastructure—for visitors to enjoy the preserves”* should be added to this list. The list of “additional objectives” that follows is, as previously discussed, an incomplete amalgamation of the Plan’s measures of success, guiding principles, and interests and concerns; the precise list on page 15-2 is not found in the Plan. We recommend re-organization of these elements so that the goals and operational objectives of the PEIR are abundantly clear.

15-2: Page 15-3: Section 15.4, Alternatives Eliminated From Further Consideration, takes two potential Plan elements that are typically considered “tools” or “strategies” for improving the environmental and recreational sustainability of trails (e.g. temporal separation of trail use, and the construction of bike-only roads, trails, and related facilities), and instead elevates them to the level of CEQA “alternatives” in order to dismiss them. This is problematic on a number of levels:

- Neither of these tools can reasonably be expected to classify as an “alternative” under CEQA, as they do not propose systemwide changes to the management of the entire road and trail network. NOP commenters clearly suggested these as proposed policies, engineering/design specifications, and/or BMPs for discrete (non-systematic) road and trail opportunities, consistent with their inclusion in related planning and CEQA documents such as California State Parks’ recent Programmatic Environmental Impact Report on Changes in Trail Use.
- The elimination of bike-specific facilities is in direct conflict with Policy SW.9, Road and Trail Connectivity, which states *“The MCOSD will strive to increase road and trail connectivity for all trail user types, and provide opportunities for short to medium distance loops and long-distance rides. The MCOSD may consider one-way, uphill-only, and single-use trails to achieve these ends”* [emphasis added].
- These two tools are eliminated from consideration as alternatives because they *“would not affect any physical aspect of managing, maintaining, or constructing roads and trails.”* This has not prevented multiple new systemwide policies from being proposed in the Plan and PEIR that do not have a direct effect on the physical condition of the road and trail network, for example Policy SW.23, Helmet Requirement, or Policy T.3, Signage on Blind Corners. These policies directly enhance the safety and experience of visitors, which is a primary goal of the Plan and the PEIR.

In consideration of the above, temporal use separation and the construction/adoption of bike-only roads/trails/facilities should be included in the PEIR as either systemwide policies, engineering/design specifications, and/or BMPs, and not presented or eliminated as alternatives under CEQA.

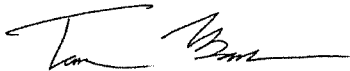
⁸ Available at <http://www.pacinst.org/publication/the-impacts-of-sea-level-rise-on-the-california-coast/>

⁹ For more on sea level rise, please see our RTMP comment letter.

15-3: Page 15-4: The language describing the No Project Alternative is problematic in that it appears to imply that the District is not currently in compliance with current state law and recent legislation regarding road and trail maintenance and natural resource protection. The second paragraph under the No Project Alternative states, *“Without approval of the proposed RTMP, the MCOSD would continue to rely upon policies adopted in 2005 and 2007 that would not reflect current state law and recent legislation. Because the proposed RTMP contains new and updated policies, procedures, standards and BMPs to better manage road and trail maintenance and development, and protect natural resources, the No Project Alternative would not include any of the new policies and implementation programs designed to address the environmental impacts of continued maintenance and the development of new roads or trails.”* This language is a liability for the District, because it implies that the District is aware of better ways to manage its roads, trails, and natural resources, and has simply been unable to apply them without the governing context of the proposed Plan. This is inconsistent with the District’s known historic stewardship of natural resources, and directly conflicts with repeated language throughout the Plan and PEIR that states that one of the primary goals/objectives of the Plan is to *prioritize* road and trail maintenance and construction activities such that the overall environmental impact of the road/trail network is reduced. We suggest that the District give itself more credit, and re-word this section so that it recognizes ongoing stewardship and the proposed re-prioritization of road/trail management under the RTMP.

Again, we appreciate the opportunity to participate in the public process that developed the RTMP and PEIR, and we look forward to engaging the District further on these comments. If you have any questions, please do not hesitate to contact me at 415-272-2756.

Sincerely,



Tom Boss, Off-Road and Events Director

cc:

MCBC Off-Road Program Committee

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December 2, 2013

Dear James,

The Marin County Bicycle Coalition (MCBC) appreciates the opportunity to comment on the District's Draft Road and Trail Management Plan (DRTMP, or Plan) and its accompanying Draft Tiered Programmatic Road and Trail Management Plan (DTPEIR, or EIR). MCBC represents 2,500 annual contributing bicyclists in Marin as well as cyclists across the Bay Area and elsewhere who enjoy cycling throughout Marin's beautiful landscapes. In 2012, we initiated our Off-Road Program, which has the following goals:

- Improve opportunities for mountain bike access to singletrack and multi-use trails by working with Marin County Parks, Marin Municipal Water District, California State Parks, Golden Gate National Recreation Area, and Point Reyes National Seashore to provide bike-friendly trails within and connecting these public lands.
- Educate all trail users to have friendly and responsible interactions on trails and fire roads.
- Build strong partnerships with land management agencies, environmental and equestrian groups, and the NorCal High School Cycling League to strengthen stewardship of trails and roads, and help protect and restore sensitive habitat.

We share the District's goal of fostering a road and trail network that welcomes public recreation and education while protecting environmental quality, and view the Plan as an important step towards making that goal a reality. In this time of thanksgiving, we're grateful that the District has spent the last three years implementing a very transparent and public Plan development process. MCBC is proud to be an active partner of the District, as MCBC members (including members of our Off-Road Committee) have participated in each and every public workshop held on the Plan since 2010. We wrote extensive comments on the Preliminary Draft Plan released in October 2012, and were happy to see that many of our comments were addressed when the updated Draft Plan was released in September 2013. It is our hope that this set of comments will be similarly considered during development of the Final Plan.

In our previous conversations, you have told us that it would be most helpful if we developed separate comment letters for the Plan and EIR. Therefore, this letter focuses on our comments/proposed revisions to the Plan. We have prepared a separate comment letter on the EIR that we are submitting in parallel. Since a distilled, simplified version of the Plan serves as the Project Description (PD) in the EIR, many of our comments in this letter are relevant to the PD, and are labeled as such.

We have two types of comments on the Plan: general comments on the Plan's composition and overall tone, and specific comments on language in each of the chapters.

General Comments

GC-1: Public Use and Social Context of the Plan. We have been told by District staff that the overall goal of the Plan and its EIR is to address the *environmental context* of the road and trail network on District lands, and that the *public use context* will be addressed through (1) the adoption of design and engineering specifications referenced in Chapter 6 of the Plan, and (2) a subsequent public process that includes a series of geographically-themed workshops throughout the county that will identify potential changes to the road and trail network, including permitted use types. To lay the groundwork for (2), the Plan proposes a series of policies governing visitor use and other uses of the preserves, and makes references in multiple locations¹ to resolving/reducing user conflict and improving recreational opportunities/experiences. In this way, the Plan does indeed address the public use context, though it says little about the existing context, nor proposes a vision for what the future context should look like.

As we have stated in past comment letters, one of the primary sources of user conflict and frustration in Marin County is the lack of legal narrow-trail or "singletrack" riding opportunities relative to the size of the local mountain biking community. By the District's own data, mountain bikers comprise roughly a quarter of the District's recreational users, yet have legal access to a far smaller proportion of narrow trails. Mountain bikers' legal access to fire roads and multi-use trails in the District and elsewhere is often cited as a reason why our community should be content with historically disproportionate legal singletrack trail access, but mountain bikers enjoy the narrow trails to fire roads and wider multiuse trails for the exact same reasons hikers, dog walkers, equestrians, and other user groups do: to be closer to nature, enjoy the shade on a hot summer day, and utilize a less steep and difficult route between hills and valleys (given that most fire roads are relatively steep due to their genesis as ranching roads that were typically accessed via motor vehicles).² This is an important component of the public use context, and one that we hope to see addressed by the Plan and its subsequent public process. For this reason, we request that one of the Guiding Principles for Managing Roads and Trails on the MCOSD Preserves (page 4-9) is elevated to a "primary goal" of the Plan (page 1-3): "*The road and trail system will provide a fair, desirable, and appropriate range of recreation opportunities—and associated infrastructure—for visitors to enjoy the preserves.*" Making this an explicit goal of the Plan will go a long way towards helping the District achieve its stated primary goal to "*improve the visitor experience and visitor safety*" of all users, including the mountain bike community.

GC-2: Documentation of Public Process. Despite the robust and lengthy public process that went into development of the Plan (four public scoping workshops, one public scoping meeting, five community workshops, public review of the TPEIR's Notice of Preparation, multiple public meetings/presentations to the Board of Supervisors and the Parks and Open Space Commission, and public review of the October 2012 Preliminary Draft Plan), almost none of this process is documented within the Plan. The Plan makes brief references to the public process in Chapter 1 and the visitor census and survey in Chapter 3, but the latter material generally only describes users' existing usage patterns – not the desired conditions and experiences that were expressed during the community workshops and documented in responses to the Preliminary Draft Plan. The Final Plan should include this information so that current and future District staff (as well as current and future users themselves) can understand the social context of the Plan, and how the public process shaped its final form. An appendix summarizing the public process and its outcomes would be an excellent way to include this information. Such an

¹ e.g. page 1-2: "The process of this *Road and Trail Management Plan* sought to improve recreation opportunities, resolve conflict, improve the safety and sustainability of the roads and trails, and protect the wondrous natural species and habitats of the MCOSD." Minimizing user conflict is mentioned on pages 1-6, 4-1, 4-2, 4-9, and elsewhere.

² For example, no hiker in their right mind has ever said "I really prefer hiking Luiz Fire Road to Big Rock Trail."

appendix should also include all the comment letters the District received on the Preliminary Draft and Draft Plans, much as the Final EIR must include comment letters on the Notice of Preparation and Draft EIR.

GC-3: Clarification of Goals and Objectives. The Draft Plan describes its “primary goals” on page 1-3, its “measures of success” on page 1-5, its “guiding principles” on page 4-9, and its “interests and concerns” on page 4-10. In general, these latter three elements are simultaneously more specific (i.e., they address specific areas of concern) and more broad (i.e., cover a wider range of issues) than the “primary goals”, and only the “measures of success” could be considered *operational objectives* that are somewhat measurable and/or quantifiable. Even then, the “measures of success” are presented in the passive voice, and for some measures the lack of an active voice obscures which direction would be considered a positive development. For example, “number of new trails created” is described as a measure of success, but it’s not clear if *increasing* the number of anticipated new trails would be considered a success, or if *decreasing* the number of anticipated new trails would be a success. In any case, it is not clear which set of elements defines the standards against which the future road and trail network will be compared. We recommend re-organization of these elements so that the goals and operational objectives of the Plan are abundantly clear.

Chapter Comments

Chapter 1: Project Initiation

1-1: Page 1-1: The sentence *“They [the District’s preserves] are Marin’s backyards, treasured as daily destinations for local hikers, dog walkers, mountain bikers, equestrians, bird watchers, and those who want to be immersed in nature in their recreational pursuits, right in their own communities”* implies that hikers, dog walkers, mountain bikers, equestrians, and bird watchers are separate from those who want to be immersed in nature. The sentence should be reworded to state that *“They [the District’s preserves] are Marin’s backyards, treasured as daily destinations for those who want to be immersed in nature right in their own communities, including local hikers, dog walkers, mountain bikers, equestrians, and bird watchers.”*

1-2: Page 1-2: The first sentence in the second paragraph should be revised to state *“In addition to the basic goal to provide roads and trails to meet the needs of all muscle powered users of MCOSD lands – including hikers, equestrians and mountain bikers – conflicts among visitors, safety concerns, high speed and extreme riding, unauthorized off-trail use, highly destructive trail building in fragile areas, sedimentation into creeks, fire risk and fire fuel management needs, the proliferation of invasive nonnative plants, and subsequent diminution of ecological integrity drove the initiation of the two planning processes.”* This phrasing emphasizes that providing fair, desirable, and appropriate recreational opportunities for all user groups should be an explicit goal of the District.

1-3: Page 1-3: The goal of “improve the visitor experience and visitor safety” should be revised to state “improve the visitor experience and visitor safety while addressing changing patterns in visitor use.”

1-4: Page 1-5: In the “measure of success” section, *“affects on the environment”* should be *“effects on the environment.”*

1-5: Page 1-6: Under the “public use of roads and trails” measures of success, “development of a road and trail network with equitable access opportunities to roads and trails for all user groups” should be added.

Chapter 2: Overview: MCOSD Preserves and the Road and Trail System

2-1: Pages 2-4 through 2-6: The text in these pages describes a total of 179 miles of roads and trails, yet page 2-3 states that the preserves contain a total of 280 miles of roads and trails. This inconsistency is not explained.

Chapter 3: Framework for Science-Based Management

3-1: Figures 3.4 and 3.7 are from documents produced by the International Mountain Bicycling Association (IMBA) that describe design and engineering specifications for multi-use and bike-specific trails that protect both user safety and the environment. These documents (*Building Better Mountain Bike Trails: Sustainable Singletrack* and *Building Better Trails: Constructing and Maintaining Outstanding Trails*, both by IMBA, as well as *Managing Mountain Biking: IMBA’s Guide to Creating Great Riding* compiled by Pete Webber), as well as an accompanying guide published by IMBA in 2004 (*Trail Solutions: IMBA’s Guide to Building Sweet Singletrack*) are utilized by a broad range of public and private open space land managers across the country, and should be considered for inclusion in the District’s list of approved trail design and engineering specifications listed in Chapter 6.

3-2: Page 3-12: The section on Road and Trail Width is a helpful place to include the definitions of fire/service roads, multi-use trails, and narrow/single-track trails that were developed during a November 2009 roads and trails workshop. This section should also define “narrow”, “moderate”, and “wide” trails, and state if these widths typically describe the trail’s bench cut or the actual unvegetated trail bed.

3-3: Page 3-20: The section on road and trail redundancy sets the stage for a concept that is emphasized throughout the Plan and its accompanying EIR: that roads and trails that take different routes to the same location are by definition unnecessary and a target for decommissioning. The section states that 27% of roads and trails throughout the system are redundant, and that these results “imply that there is ample opportunity for potentially decommissioning [roads and] trails...” This is a very problematic concept for a number of reasons:

- It implies that a route’s value and purpose lie primarily in its destination, not the method the route takes to get from point A to point B.³
- It ignores that by definition, multiple trails that lead from one destination to another constitute a loop (which is particularly problematic given that later language in Chapter 4 emphasizes the value of loop trails).
- It ignores that the decommissioning of many of these routes, particularly fire roads, is infeasible due to their use by power, water, and other utilities, fire districts, and other municipal agencies. Indeed, if so many roads were truly redundant and unnecessary, one suspects that many of them would have long ago passively converted to trails, like many of the

³ More poetically inclined people would say “it’s about the journey, not the destination.”

late 19th and early 20th century logging roads that once criss-crossed Marin County.⁴ This point is underscored by language on page 3-79 that states that *“utility companies and districts in Marin County currently use the majority of MCOSD roads, including all 113 miles of fire roads, although some access is restricted by the MCOSD”* [emphasis added]. Only Region 6 includes fire roads that are not used by any utility service providers (page 3-80); the only preserve with commonly publicly accessed roads and trails in this region is Ring Mountain OSP.

- It fails to acknowledge that having multiple routes between the same destinations can provide opportunities to spatially separate different user groups when the trail alignment is not conducive to multiple uses at the same time. For example, redundant trails near horse stables can provide opportunities to separate equestrians and their unique safety need, from other trail users, while maintaining recreational access for other user groups.
- It is inconsistent with Goal L-2.6 of the 2008 Marin County Parks and Open Space Strategic Plan, which instructs the District to *“Provide Multiple Access Points. Design trails with multiple access points to maximize accessibility and minimize concentrating access.”*
- It merges roads and trails as one facility type, which is inconsistent with the classification scheme presented in the November 2009 trail workshop (i.e. fire/service roads, multi-use trails, and narrow/single-track trails) and the corresponding differences in widths, gradients, and other characteristics of these facilities.

We understand that in some cases, redundant roads and trails that not environmentally sustainable can be appropriate targets for decommissioning. However, when considering the public use context of such a road/trail, rehabilitation or reconstruction may be a better option to avoid conflict, improve safety, and improve the user experience. We strongly suggest that the District re-write this section to acknowledge the above bullet points, and de-emphasize road/trail redundancy as driver for decommissioning.

3-4: Page 3-22: While we understand that the Draft Vegetation and Biodiversity Management Plan describes the vegetation zones in depth, more information about the zones should be included in this section, particularly the relationship of the zones to the management zones presented in Chapter 4.

3-5: Page 3-23: The last paragraph, in reference to the vegetation zones mapped by the District, states that *“the potential for impacts associated with roads and trails is highest in the legacy zone and lowest in the highly disturbed zone.”* It is not clear from this sentence what types of impacts are being discussed – environmental impacts in general, or impacts to vegetation communities (e.g. trampling, the potential for roads/trails to be vectors for invasive/non-native species such as broom, etc.). We presume it is the latter, as other environmental impacts (e.g. to other biological resources, water quality, etc.) are dependent upon a broad range of factors including but hardly limited to vegetation communities. The sentence should be rewritten as *“In general, the potential for impacts to rare plants and vegetation communities associated with roads and trails is highest in the legacy zone and lowest in the highly disturbed zone.”*

3-6: Page 3-67 and 3-68: The list of preserves that are partially or completely within the 100-year flood zone as defined by FEMA does not include Rush Creek OSP or Deer Island OSP. Both of these preserves

⁴ Contour Trail in Gary Giacomini OSP is an example of this type of passive conversion from former logging road to trail. The bench width of Contour Trail is roughly that of a fire road, but since the cessation of logging activities, vegetation has encroached on the bench such that the unvegetated portion is the width of a trail.

either contain or share immediate, unprotected boundaries with flood basins that are mapped within the FEMA 100-year base flood hazard zone, and are likely subject to an increased risk of inundation with sea level rise and the changes in flood frequency/intensity/duration associated with climate change. Rush Creek OSP in particular contains roads and trails that are subject to inundation by sea level rise. Both Rush Creek and Deer Island preserves should be included in the list on page 3-67. In addition, the BCDC map on page 3-68 does not include the northern portions of Marin County that contain the Rush Creek, Deer Island, and other preserves. This map should be re-developed using shapefiles publicly available from BCDC and the Pacific Institute⁵ that describe anticipated inundation due to sea level rise.⁶

3-7: Pages 3-73 through 3-78: Table 3.14 and the Road and Trail Use section could be improved by providing a more comprehensive summary of public use by the 14 preserves that were surveyed, instead of simply discussing which preserves ranked in the top three for particular uses. Knowing which preserves had the least surveyed amount of certain types of uses can be as useful to the reader as knowing which preserves had the most. Much of the text in pages 3-73 to 3-78 could be replaced with such an improved table.

3-8: Pages 3-78 through 3-80: Please see comment 3-3 for a discussion of the relevance of utility and emergency access to road/trail redundancy.

3-9: Page 3-78: Under “Visitor Experience”, 94% of visitors rated their interactions with other preserve users as “great” or “good”. We point this out to emphasize that while reducing conflict between users is an appropriate and justified goal of the Road and Trail Management Plan, it may not be the persistent and widespread problem that some perceive it to be. It also underscores the effectiveness of existing educational and outreach programs implemented by the District, other local land managers, and advocates such as MCBC. MCBC is a proud sponsor of a program that brings together young mountain bikers from the NorCal High School Cycling League and local equestrians to educate these groups about each others’ safety needs. It is our firm belief that programs such as this are just as important to reducing user conflict and improving safety than any physical changes that are made to the road and trail system.

Chapter 4: Road and Trail Use Policies and Management

4-1: Page 4-2: Under “Visitor Use Goals and Management Zones”, the goal to “*provide an appropriate range of desired experiences for visitors*” should be re-worded as “*provide a fair, desirable, and appropriate range of recreation opportunities—and associated infrastructure—for visitors to enjoy the preserves*” to be consistent with the Guiding Principles for Managing Roads and Trails on MCOSD Preserves on page 4-9. Similarly, the goal to “*address visitor conflict issues*” should be reworded more specifically as “*reduce the potential for visitor conflicts to occur.*”

4-2: Page 4-4: The second paragraph on page 4-4 states that “*While the visitor use management zones are based in part on environmental conditions, they do not prescribe management of natural resources. Instead, they prescribe the management of visitor use and associated development.*” This language is

⁵ Available at <http://www.pacinst.org/publication/the-impacts-of-sea-level-rise-on-the-california-coast/>

⁶ It is important to note that in general, both the BCDC and Pacific Institute analyses primarily consider static sea level rise – in other words, they simply overlay predicted future Bay water surface elevations with existing topography. These analyses do not consider the dynamic effects of winds, wave run-up, and episodic events such as storms, and as such may misrepresent the potential flood risk to District preserves.

imprecise and confusing. While the zones may not *directly* prescribe management of natural resources, the “associated development” in this case – the physical form of the road and trail system – is the primary driver of impacts to natural resources.⁷ As such, the visitor use management zones prescribe policies for managing the impacts of the road and trail system on natural resources. This is an important distinction, particularly given the role the zone-specific policies play in governing the shape and form of the road and trail network throughout District lands (pages 4-18 and 4-19). We suggest revising the above-referenced sentences to state, *“The visitor use management zones are based on environmental conditions, and prescribe policies for managing the impacts of the road and trail system on natural resources. The management of the resources themselves is described in the Vegetation and Biodiversity Management Plan.”*

4-3: Pages 4-4 through 4-9: Consistent with Comment 4-2 above, we suggest that the District provide a more detailed vision for the desired future conditions in each of the zones. Given that the zones are based in part on environmental conditions, and that one of the primary goals of the Road and Trail Management Plan is to reduce the environmental impacts of the road and trail system, for each zone the desired future condition should describe the desired environmental improvements. As currently stated, the desired future conditions for each zone are vague, and do little to either (1) relate each zone’s environmental context with its zone-specific management policies, or (2) differentiate the zones from each other. For example, it is not a coincidence that all Zone 1 areas (Bolinás Lagoon OSP, and portions of Gary Giacomini and Cascade Canyon OSP) have sensitive aquatic habitats with listed species downstream, but this is not discussed at all in the description of Zone 1.

To make the desired future outcomes of the zone-specific management policies more clear, we suggest language revisions that differentiate between minimizing, reducing and maintaining⁸ pre-Plan levels of impacts of the road and trail system on target environmental conditions:

- **Zone 1:** Visitors perceive and experience a minimally disturbed natural landscape, with few or infrequent encounters with others (unless traveling in a group), opportunities for solitude, and wildlife viewing. Areas in this zone are typically accessed for recreation only after first traveling for some distance, and/or passing through adjacent non-District lands or District lands in Zones 2, 3, or 4. The road and trail system is managed to minimize (to the greatest extent feasible) erosion and sediment release into downstream salmonid-bearing streams and other sensitive aquatic habitats, avoid rare plant communities, minimize opportunities for roads and trails to serve as colonization pathways for invasive plants and noxious weeds, and maximize contiguity with adjacent large open spaces managed by other agencies.
- **Zone 2:** Visitors perceive and experience easy access to a natural landscape, with more frequent encounters with others than in Zone 1. Opportunities for solitude and wildlife viewing, while possible, are not as frequent as in Zone 1. Areas in this zone are moderately accessible for recreation, and are often accessed by traveling through District lands in Zones 3 or 4. The road and trail system is managed to reduce (relative to pre-Plan conditions) erosion and sediment release into downstream aquatic ecosystems, avoid or minimize disturbance to rare plant communities, and reduce opportunities for roads and trails to serve as colonization pathways for invasive plants and noxious weeds.

⁷ Within the context of this Plan – obviously, there are much larger drivers of impacts to natural resources within District preserves (e.g. climate change, invasive species, fires, drought, etc.).

⁸ In this context, “maintain” = “prevent from getting worse.”

- **Zone 3:** Visitors perceive and experience a primarily natural but actively managed landscape with the potential for frequent encounters with others. Opportunities for solitude and wildlife viewing may be compromised. Areas in this zone are very accessible for recreation. The road and trail system is managed to maintain or reduce (when feasible, relative to pre-Plan conditions) sediment release into downstream aquatic ecosystems, minimize disturbance to rare plant communities, and maintain or reduce opportunities for roads and trails to serve as colonization pathways for invasive plants and noxious weeds.
- **Zone 4:** Visitors perceive and experience an actively managed landscape and should expect frequent encounters with others, with little to no opportunities for solitude and limited opportunities for wildlife viewing. Areas in this zone are highly accessible for recreation, and may have characteristics of a developed/disturbed landscape. The sights and sounds of others and the built environment are present. The road and trail system is managed to prevent pre-Plan levels of downstream sediment release and invasive/noxious weed populations from becoming worse.

The increased clarity provided by these (or similar) revisions feeds directly into our suggestions for more useful zone-specific policies for visitor use management described in comment 4-12 below.

4-4: Page 4-10: Under “Systemwide Policies”, category 1 should be revised to state *“Meet current and future demand for access to public lands by providing a fair, desirable, and appropriate range of roads and trails for a variety of users”* consistent with the with the Guiding Principles for Managing Roads and Trails on MCOSD Preserves on page 4-9. In addition, the reference to the “future demand” for access to public lands is notable in that the Plan does not appear to include policies that call for regularly-scheduled assessments of how District lands are being used. Without such assessments, it is not clear how the District would anticipate and proactively plan for (instead of *react to*) the future demand for access. We recommend that the District implement road/trail use surveys (similar to the one done for this Plan) every 5 years as a new systemwide policy. We also recommend a post-implementation evaluation process for projects a few years after completion to determine if they reduced impacts on the environment, reduced user conflict in the area and enhanced the visitor experience. It would help identify the best allocation of resources on future projects as well.

4-5: Page 4-14: Policy T1d should be revised to state *“The MCOSD will permit bicycling and saddle animals on trails designated and signed for their use, including (a) existing trails known from the Dec. 2011 inventory, (b) new trails that the MCOSD builds and designates for shared use, and (c) existing trails on newly acquired lands, when compatible with natural resource protection and the safety of trail users.”* As currently written, the language for T1d excludes existing trails on existing MCOSD lands, which is inconsistent with existing conditions and prevents existing trails (whether currently system or non-system) from being designated in the future for bicycling or saddle animal use. The current language for T1d also places it in conflict with the “Management Actions” section of Chapter 5 (page 5-4), which describes *“changing the types of permitted recreational activities (e.g. pedestrian travel, equestrian use, or mountain biking) along a road or trail”* as a type of potential project under the RTMP.

4-6: Page 4-14: Policy SW.3, Prohibition on Off-Road or Off-Trail Equestrian Use, should be revised to state *“Horses and pack animals must stay on system roads and trails designated for their use, except when watering or resting the animal...”* This revision makes the language in SW.3 more consistent with the language of Policies T1d and SW.4 as well as the language in the zone-specific policies in Table 4.2.

4-7: Page 4-14: MCBC strongly supports Policy SW.9, Road and Trail Connectivity. We view this policy as an excellent tool to separate users in areas with the potential for conflict that will improve user safety.

4-8: Page 4-15: Policy SW.10 inappropriately single out mountain bikers as the only user group capable of engaging in dangerous activities. We suggest revising the policy to say *"Prohibition on Dangerous Activities. Activities that exceed the speed limit, or that are reckless or considered dangerous for the resources, because of other user activity, or because of physical trail aspects such as sight distance or confluence with other trails, are strictly prohibited on open space preserves."*

4-9: Page 4-15: MCBC fully supports Policy SW.11, Trail Etiquette, and is available to hand out literature and bells at MCOSD trailheads.

4-10: Page 4-15: MCBC fully supports Policy SW.12, Expectation of Active Cooperation of All Trail Users, and looks forward to partnering with other organizations and user groups to address safety and educate all users about trails rules, regulations, and etiquette.

4-11: Page 4-15: Policy SW.13, Prohibition of Uses, should be revised to state *"...Examples of areas where this policy may apply include those proximate to schools and other areas with large numbers of children on foot and on bikes, stables and other areas traditionally heavily traveled by equestrians, or areas of significant habitat value."* This revised language considers the county's Safe Routes to School program, which encourages kids to commute to school by walking or bicycling instead of by car.

4-12: Page 4-15: Per comment 3-3, the emphasis on eliminating redundant roads and trails in Policy SW.16 is not very useful given the inherent value in "redundant" trails and the practical challenges of decommissioning. We recommend that the District eliminate this policy, as any given road or trail segment that "has the worst overall condition, presents the highest maintenance costs, or contributes to the most environmental effects" regardless of its redundancy status is likely to be rehabilitated, rerouted, or decommissioned anyway given the suite of Plan tools and policies that are aimed at reducing the environmental impact of the overall road and trail system.

4-13: Page 4-15 MCBC strongly supports Policy SW.18, Conversion of Existing Roads to Trails, as it reduces environmental impacts from fire roads while enhancing the visitor experience for all user groups.

4-14: Page 4-16: Policy SW.25, Decommission Nonessential Roads, should be revised to state *"Nonessential roads in the interiors of the preserves will be decommissioned or converted into trails to increase habitat connectivity and reduce the potential for invasive species..."* Per comments 3-3 and 4-12, while road decommissioning is highly unlikely, this revised language gives the District flexibility to implement road-to-trail conversions that would maintain or even enhance recreation use values while decreasing environmental impacts.

4-15: Page 4-16: Policy SW.27, Remove or Realign Roads and Trails Away From High-Value Cultural and Historic Resources, should be reconsidered in light of the educational value that these resources can provide. Properly managed historic and cultural resources can serve as a destination for trail users, and the District should take care to differentiate between those resources that can be safely and sustainably enjoyed by road and trail users, and those that cannot.

4-16: Page 4-17: Policy SW.30, Floodplain Policy for New and Improved Roads, Trails, and Associated Facilities, should be revised to consider “*potential flood and sea level rise impacts to any proposed new or improved road, trail, or associated facilities...*” This would help make the policies in the Plan more consistent with regional guidance from BCDC, the US Army Corps of Engineers, and other agencies regarding current and potential future flood risk.

4-17: Pages 4-18 through 4-19, Table 4.2: As discussed above in comment 4-3, the zone-specific policies as currently written do not adequately define the environmental context of each zone or describe the connection between zone-specific management policies and desired environmental outcomes. Much of the language in Table 4.2 is repeated between zones, blurring the differentiation between the zones and making it unclear why they exist in the first place. We recommend that the language in Table 4.2 describing the “Road and Trail Management Emphasis” (row 1) of each zone be revised per our suggested language in comment 4-3. Consistent with this language, we recommend that the language describing the “Policies Regarding New Roads and Trails” (row 2) be revised to be more specific, and to reflect the enormous amount of effort the District, its staff, and its contractors have put into assessing the District’s road and trail network (details of these suggested revisions are below).

It should be obvious by now that across a broad range of users, one of the most problematic elements of the Plan and its accompanying PEIR is the use of decommissioning ratios to permit construction of new trails.⁹ At first glance, the ratios are indeed a mathematically simple way of *decreasing* the mileage of the entire road and trail network (including all of the non-system trails that were included in the December 2011 assessment), while *increasing* the mileage of system-designated roads and trails that are well-designed, safe, sustainable, and impart minimal impacts to the environment. On a practical level, however, these ratios are much more difficult to implement, for a variety of reasons:

- They presume that there is adequate funding and/or acreage to implement decommissioning, particularly at the 2:1 ratio that is proposed for Zone 1 (which comprises 16% of all preserve lands). What if there is only enough funding or acreage to decommission roads/trails at ratios of 1.2:1 in Zone 1, or 0.6:1 in Zones 2 through 4? The ratios tie the District’s hands and reduce its flexibility to consider site-specific opportunities and constraints.
- Though the ratios apply to acreage, implying that fire roads could serve as a “decommissioning bank” to permit a relatively longer length of narrower trail, there are multiple, significant obstacles to fire road decommissioning (as previously discussed in comments 3-3 and 4-8). It is unlikely that fire road decommissioning will be able to happen at a scale that would permit any notable length of compensatory trail construction.
- The ratios focus solely on decommissioning, and exclude consideration of road to trail conversions, rehabilitation, reconstruction, and other tools that could result in similar improvements to environmental conditions such as erosion and habitat fragmentation.
- The ratios are implemented independently from the significant amounts of data on vegetation, natural communities, and road/trail conditions that the District collected as part of the RTMP and VBMP. In other words, they substitute acreage as an across-the-board surrogate for environmental impacts, when in reality those impacts are highly site-specific and dependent on a host of physical, biological, and social factors.

⁹ While the ratios technically apply to new roads and trails, it’s highly unlikely that new fire roads are necessary on existing District lands, so our discussion in this comment focuses on trails.

We believe that there is a better way to implement zone-specific management policies for new trails that are based in reality, not theory, and that will be more effective at both reducing the environmental impacts of the road and trail network while addressing the changing recreational needs of a growing Marin community. We suggest replacing the ratio language with the following language:

- **Zone 1:** Construction of new trails will be permitted only where the net adverse environmental effect would be reduced, to enhance environmental protection, or if necessary to achieve critical connections within the overall road and trail system. Construction of any new trail will require compensatory work in the same watershed such that there is an anticipated net reduction in sediment release from the new trail and existing roads and trails. New trail construction will avoid rare plant communities, and include provisions for active management for at least 3 years post-construction to prevent/minimize the establishment of non-native species and noxious weeds along the trail corridor. New trails will be aligned to minimize intrusion into sensitive wildlife habitat and preserve contiguity with adjacent open space parcels.
- **Zone 2:** Construction of any new trail will require compensatory work in the same watershed such that there is an anticipated net reduction in sediment release from the new trail and existing roads and trails. New trail construction will avoid or minimize disturbance to rare plant communities, and include provisions for active management for at least 2 years post-construction to prevent/minimize the establishment of non-native species and noxious weeds along the trail corridor. New trails will be aligned where feasible to minimize intrusion into sensitive wildlife habitat.
- **Zone 3:** Construction of any new trail will require compensatory work in the same watershed or elsewhere in zone 1, 2, or 3 such that there is no anticipated net increase in sediment release from the new trail and existing roads and trails in the watershed or zone. New trail construction will avoid or minimize disturbance to existing native plant communities, and include provisions for active management for at least 1 year post-construction to prevent/minimize the establishment of non-native species and noxious weeds along the trail corridor. New trails will be aligned where feasible to minimize intrusion into wildlife habitat.
- **Zone 4:** Construction of any new trail will require compensatory work in the same watershed or elsewhere in zones 1 through 4 such that there is no anticipated net increase in sediment release from the new trail and existing roads and trails in the watershed or zone. New trail construction will minimize disturbance to existing plant communities, and include provisions to establish native plant communities and minimize weed establishment whenever feasible.

Similarly, much of the language in “Policies Regarding Existing Roads and Trails” (rows 3 through 6 in Table 4.2) is repetitive and non-specific, and once again relies on an unreliable tool (decommissioning) to reduce environmental impacts. We suggest that the language in this section is revised as follows:

- **Zone 1:** Road and trail conditions will be improved to protect and, where possible, enhance sensitive resources, reduce maintenance requirements, and support low to moderate levels of recreational use. Existing roads and trails that are classified as Poor or Fair-Poor will be rerouted, rehabilitated, or, if absolutely necessary, decommissioned such that their condition is improved to at least Fair. Necessary roads and trails will be rerouted outside stream conservation areas unless no feasible alternative is available for that segment.

- **Zone 2:** Road and trail conditions will be improved to protect sensitive resources, reduce maintenance requirements, and support moderate to high levels of recreational use. Existing roads and trails that are classified as Poor or Fair-Poor will be rerouted, rehabilitated, or, if absolutely necessary, decommissioned such that their condition is improved to at least Fair. Necessary roads and trails will be rerouted outside stream conservation areas unless no feasible alternative is available for that segment.
- **Zone 3:** Road and trail conditions will be improved to protect existing resources, reduce maintenance requirements, and support moderate to high levels of recreational use. Existing roads and trails that are classified as Poor and Fair-Poor will be rerouted or rehabilitated such that their condition is improved to at least Fair-Poor and Fair, respectively. Necessary roads and trails will be rerouted outside stream conservation areas unless no feasible alternative is available for that segment.
- **Zone 4:** Road and trail conditions will be improved to protect existing resources, reduce maintenance requirements, and support high levels of recreational use. Existing roads and trails that are classified as Poor and Fair-Poor will be rerouted or rehabilitated such that their condition is improved to at least Fair-Poor and Fair, respectively. Necessary roads and trails will be rerouted outside stream conservation areas unless no feasible alternative is available for that segment.

For all zones, at-grade stream crossings should be minimized.

Chapter 5: Road and Trail Decision-Making Process

5-1: Page 5-5: The third bullet point under Step 2 states that the following type of project would be rejected for being inconsistent with Parks policies: *“work that would duplicate an existing facility in close proximity that provides a similar user experience, except if the project would be necessary to reduce adverse environmental effects or enhance visitor safety.”* Effects on visitor safety are not included as a “social criteria” in Table 5.1 (Criteria Used in Step 4 of the Decision-Making Models for Road and Trail Projects), and should be included.

5-2: Page 5-8: The section of Table 5.1 that describes the social criteria considered in the decision-making process fails to include the following:

- **User groups.** Who would be able to access a road or trail, and how would that access contribute to a “fair, desired, and appropriate” range of recreational opportunities for all user groups?
- **Suitability for single-use or multi-use.** Would the project be suitable to support multiple user groups at once? If not, could a range of single-use strategies be employed in a way that enhances access opportunities and improves safety for all user groups?
- **Historic use.** What are the historic use patterns of the road or trail, and would they be affected by the proposed project?
- **Accessibility.** How would users access the trail? Can the road or trail only be accessed by car, or can it be accessed on foot/bike/horse from adjacent neighborhoods? Is the road or trail accessible by public transit?


We recommend inclusion of these criteria to address some of the most pressing social issues related to road and trail access on District lands.

Chapter 6: Road and Trail Standards and Best Management Practices

6-1: Page 6-1: The list of Design and Engineering Specifications should include the exhaustive list of road and trail design and engineering specifications, Best Management Practices (BMPs), and mitigation measures that are outlined in California State Parks' Programmatic Environmental Impact Report on Changes in Trail Use, Appendix C Trail User Conflict Study.¹⁰ This document, which was certified in May 2013, contains a meticulously researched and field-tested set of standards for road and trail construction, maintenance, and management that protect environmental quality, user safety, and recreational access in California's unique landscapes, including state parks in Marin County.

MCBC thanks Parks staff and consultants for working diligently to produce this Draft RTMP, and for striving to create an objective system for evaluating projects and balancing resource protection with visitor use. We look forward to continuing to collaborate with Parks staff, and our friends in the environmental, hiker and equestrian communities, to make the RTMP a model plan and implement it successfully.

Sincerely,



Tom Boss, Off-Road and Events Director

cc:

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¹⁰ http://www.parks.ca.gov/?page_id=26278