

November 13, 2015

Superintendent Danita Rodriguez
Bay Area District, California State Parks
845 Casa Grande Road
Petaluma, CA 94954



Subject: Comments on Easy Grade Trail Proposed Change-in-Use

Dear Superintendent Rodriguez:

Marin Conservation League appreciates the opportunity to submit comments on the proposed change-in-use of Easy Grade Trail to accommodate mountain bikers and hikers. MCL has held a deep interest in protecting the welfare and ecological integrity of Mt. Tamalpais for many decades. We also recognize that the mountain has been a magnet for hikers and other recreationists from around the Bay Region and beyond for well over a hundred years. In spite of ready access by a large urban population and accelerating visitor use (some estimate 2 million people now visit Mt. Tam every year), the mountain has managed to retain a feeling of wildness and solitude that makes it a unique and restorative place. Easy Grade Trail is a traditional, low-impact foot-path that has for many decades provided hikers of all ages an “easy” way to reach or descend from Mt. Theater (in contrast to the steeper, more rugged Bootjack Trail). Retaining this sense of place on trails like Easy Grade is important to MCL, especially as recreational demands on the mountain’s roads and trails take their toll.

MCL’s Trail Policy. The primary goals of MCL’s adopted Trail Policy (Attachment) for the management of Marin’s road and trail networks are to: *“avoid adverse impacts due to recreation, ensure that the natural environment and the wildlife it sustains will persist into the future, and assure users of their safety and well-being.”* Therefore, our concerns over the proposed change-in-use are two-fold: that expanded use by mountain bikes not degrade the terrain and habitat that Easy Grade Trail traverses; and that the safety and well-being of people on foot on the trail not be disrupted by the fundamentally different pace and travel mode of a mountain bike. In particular, we are concerned that surprise encounters and near-misses could present a real or perceived hazard for people on foot as bicycles come down the long linear grade.

Mountain bikers currently have access to many miles of dirt roads and selected multi-use trails on Mt. Tam. MCL is aware that access to this trail has been a high priority for mountain bikers to connect with Mt. Theater and Rock Spring that avoids the more circuitous paved Pantoll Road. Mountain bike advocates claim safety as the primary reason for seeking an alternative route, although thousands of road bikers currently share that road with automobiles. Mountain bikers also would prefer the convenience of the shorter route and the pleasure of riding on a trail rather than on pavement.

Alternatives. In view of the difference between the two travel modes on a narrow trail

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and the opportunity for conflict, MCL's **preferred option** would be the status quo – that is, Easy Grade would remain a traditional hikers-only foot-path, as it has been for decades, and mountain bikes would continue to share Pantoll road with road bikes and automobiles. This option removes the need to realign or reconstruct the trail, and thus avoids any adverse impacts to habitat, including a sensitive serpentine plant community. The **second option** would be to reroute the trail as proposed to avoid congestion at the Mt. Theater trailhead, and limit mountain bikes to uphill travel only – as was suggested several years ago by mountain bikers themselves. This would require reconstructing two drainage crossings but avoid the impacts of installing speed-control devices, as bikers would descend by way of Pantoll Road. This option would considerably reduce expected wear and tear on the trail over time, as well as reduce impacts on surrounding habitats. The **third option**, and least attractive option from MCL's point of view, and the one with the greatest impact on the trail itself and surrounding habitats, would be to design for two-way traffic, requiring in addition to realignment and reconstructing drainage crossings, widening and installing frequent pinch points and/or other means of controlling speed for bikes coming downhill.

Mitigations and the importance of design for compatible shared use. Easy Grade Trail currently is in relatively good condition, with the exception of short stretches of erosion and two impaired drainage crossings. It is generally sustainable at current levels of use, however. Expanding that use to include mountain bikes, especially two-way traffic, will require re-routing, widening, installing pinch-points, and reconstructing stream crossings to make the path safe and sustainable for both user groups. Critically, it will require a design that forces bikers approaching from above to pass or yield to people on foot at “hiker speed.”

On the September 28, 2015, field trip to view the proposed alignment, the State Parks trail designer suggested that “trail etiquette” would be assumed, and that the locations of “pinch points” to impede speed could be determined by a biker testing the trail to identify appropriate locations. MCL requests that, if State Parks proceeds with design for two-way shared use, hikers also participate in the designation of pinch points and other speed controls. State Parks staff have made clear that they do not have ranger staff to enforce rules – that they count on all users to be “good citizens.” We appreciate this ideal, but experience tells us that compliance with speed rules cannot be taken for granted. Therefore, proper design at the outset must ensure the safety and well-being of all users!

In conclusion, MCL requests that State Parks consult hikers, who represent the large majority of all trail users on Mt. Tam even though they are rarely organized as advocates in their own behalf, in the ongoing design of this project to ensure that they can continue to walk in comfort and will not find themselves displaced over time.

Thank you for your attention. We very much appreciate your efforts to hear all points of view.

If you have questions, please direct them to Nona Dennis, Chair of MCL's Parks and Open Space Committee.

Sincerely,

A handwritten signature in blue ink that reads "Kate Powers". The signature is written in a cursive, flowing style.

Kate Powers, President

Attachment

cc: Victor Bjelajac, Chief of Maintenance, Marin Sector State Parks
Tamalpais Conservation Club
Friends of Mt. Tamalpais
Sierra Club, Marin Group
Alpine Club

MCL Trail Policy for Marin Public Lands and Open Space

Approved by MCL Board of Directors, March 17, 2015

Preamble:

Marin County contains a wealth of public open spaces and parklands. Roughly half the county consists of federal or state parkland, public watershed lands, county open space, and community-owned open space. Some of the lands are former ranches; many are relatively pristine. In either case they include a rich diversity of fish and wildlife habitats as well as cultural and scenic values, and they are managed for the most part in a “natural” state.

We are fortunate in that hundreds of miles of old ranch roads, fire roads, and trails provide recreational access to these public lands. As a consequence, Marin attracts millions of visitors annually, both local and from elsewhere, who relish the opportunity to escape their urban preoccupations and experience nature safely and in a variety of ways. Open space trails offer a different experience from urban or suburban multi-use paths. Visitors walk, study elements of the natural world, hike, ride horse-back, jog, bicycle, and exercise their dogs. Even with diligent park management, heavy recreational use and trends toward increased use threaten the health of the resources that we treasure and the quality of the experience we seek. The challenge is how to allow for different recreational activities on Marin’s roads and trails without compromising wildlife habitat and other natural and cultural resources, or the quality of experience sought by visitors.

Definitions. Trails serve many legitimate functions on public open space: moving from one place to another, recreation and socializing, exercise and stimulation, access to sites of ecological, cultural, or scenic interest, and opportunity to experience aesthetic values, solitude, and connection with nature. Visitors use different modes to carry out these activities: slow walk – sometimes with a dog, vigorous hike, jog, walk or trot (horse), and ride (mountain bike), a mode whose speed differs markedly with uphill or downhill direction, ranging from slow/moderate to very fast.

The term “trails” in this policy encompasses both dirt roads that serve as multi-use trails and traditional narrow “foot paths.” A “narrow trail” (sometimes called a single-track trail) is generally a foot path that can vary in width from 12” to 24” and is not safe for shared use by bikes with slower-moving pedestrians and horses. A “multi-use” trail is designed and/or designated for shared use by different users, such as pedestrians, bikes, and horses, and should be wide enough to safely accommodate such users; a “fire road” is by definition wide enough to safely accommodate emergency vehicles as well as all recreational users.

Goals and Recommendations.

MCL’s primary goals in the management of Marin’s road and trail networks, are to avoid adverse impacts due to recreation, ensure that the natural environment and the wildlife it sustains will persist into the future, and assure users of their safety and well-being. To achieve these goals, MCL recommends the following:

1. New trails, including renovation of existing trails. MCL discourages the construction of new trails in Marin's public and open space lands because of the existing high density of roads and trails.

Construction of a new trail into previously undisturbed land inevitably has adverse impacts, such as damage to sensitive plants and fish and wildlife habitats and invasion of non-native plants. These impacts are impossible to fully mitigate. Under limited circumstances, decommissioning an existing degraded non-system trail could partially mitigate the impacts of new construction. If a new trail is proposed in newly designated open space, or an existing trail undergoes substantial renovation, construction should minimize impacts, as follows:

- Use existing ranch roads or fire roads wherever possible, modifying for steepness through design mechanisms to control speed, where feasible, and maintaining adequate sight-lines;
- If proposing to narrow a ranch road to "trail width" to reduce erosion and sediment, be aware that safety for multi-use will be compromised;
- Avoid riparian corridors, stream crossings, wetlands, known wildlife trails, and other sensitive habitats, such as serpentine areas with rare plants, native grasslands, etc; maintain adequate buffers between the trails and adjacent habitats and employ best management practices;
- Minimize the need to remove trees and major woody vegetation;
- Design roads and trails to prevent erosion, sedimentation, and other impacts to water courses;
- Note locations of source populations of invasive plants, take measures to avoid spread into new areas, and monitor post-construction at regular intervals;
- Provide appropriate environmental review and public input to proposed projects and land management decisions.

2. Managing conditions on existing trails. Roads and trails undergo wear and tear with use over time. Maintenance of existing trails should be directed to the following:

- Correcting drainage, slope, and tread conditions that can lead to erosion and sedimentation;
- Avoiding damage to vegetation, including gradual widening of tread into adjacent vegetation due to use or formation of "eye-brows" caused by bike-riding up the sides of adjacent slopes and bench cuts;
- Closing vulnerable trails and roads during wet weather;
- Restricting access to nesting or breeding sites during appropriate seasons;
- Monitoring for new occurrences of invasive plant species and responding rapidly, with regular follow-up to prevent spread
- Monitoring for dog waste and litter, and removal.

3. Use Guidelines. Under all circumstances, the protection of habitats and safety and well-being of users should be paramount. All users share in the responsibility to protect vegetation and wildlife and to maintain safe and sustainable trails. Trails should be designed and their use managed according to the following guidelines:

- All users should stay on established trails, should not go cross-country or cut corners, and should not walk or ride on the shoulders of trails unless clearly designated for use;
- All users should recognize that night-time activity in open space, including use of bright lights, is disruptive to nocturnal wildlife and therefore should be discouraged;
- All users should take care to pack out litter and dog waste;
- All users should follow suggested YIELD protocols as a courtesy to other users;
- All users should obey safety rules as prescribed by various land management agencies, at a minimum:
 - Bicycles should be allowed only on ranch/fire roads and on trails specifically designed for safe multi- use;
 - Bicycle riders should obey speed limits of 15 mph maximum and slow to 5 mph when going around blind curves or approaching pedestrians;
 - When approaching horse-back riders, bicycle riders should slow, stop and ask the rider for direction to pass;
 - Bicycle riders should signal their approach to pedestrians by use of voice or a bell, but use only voice to signal approach to horse-back riders;
 - Equestrians should familiarize their horses and themselves with expected encounters on the trail that may frighten horses (e.g., cyclists, dogs, back-pack wearing hikers) and know how to direct others to pass;
 - Walkers with dogs should stay off prohibited trails where posted and obey leash laws;
 - Horse-back riders should stay off prohibited trails where posted and minimize vegetation disturbance when going off-trail to rest or water their horse.

Enforcement of user guidelines. Compliance with rules and guidelines depend heavily on cooperation and mutual respect of all users as well as respect for the natural environment. However, to ensure that rules are observed, MCL supports funding land management agencies to provide adequate personnel to enforce policies with targeted actions, such as increasing patrols in areas of high incident reports, and by imposing meaningful sanctions on violators. Agencies should monitor trail usage and maintain an accessible public record of reported violations.