

PRELIMINARY DRAFT ROAD AND TRAIL MANAGEMENT PLAN  
**Comment Form**  
**November 21, 2012**

Marin County Parks  
3501 Civic Center Drive, Suite 260  
San Rafael, CA 94903  
Attention: Elise Holland  
Fax: (415) 473-3795

**1. What aspects of the road and trail decision making process outlined in the Preliminary Draft RTMP do you favor?**

- a. In general terms the decision making process outlined in Chapter 9 seems true to the RTMP's guiding principle that existing and new recreational projects will follow an objective, science/fact-based, and transparent evaluation and selection process. The process is systematic and replicable, and is based on physical and biological data that have been gathered in developing this plan and the Vegetation and Biodiversity Management Plan (VBMP). The decision process proceeds through successive levels of screening that allow "bad" projects to drop out in Steps 2 and 3, and narrow the options for more rigorous evaluation in Step 4. However, see exceptions to these statements below.

**2. What concerns do you have about the road and trail decision making process . . ., and why?**

- a. Step 1 should be guided first by *need* rather than *want*. With an admitted backlog of deferred maintenance and a history of under-funding, Parks staff's input will be essential, and knowledgeable users of the preserves should focus attention on fixing, restoring, and maintaining facilities, rather than on wish lists.
- b. Step 2 should consider basic feasibility (e.g., cost, in order of magnitude, etc.) as well as fatal flaws and provide an early opportunity to drop infeasible and low "need" projects to a lower priority, if not entirely. The distinction between Step 2 and 3 is not entirely clear. Both involve fairly broad criteria and judgment based on readily available knowledge of the existing road/trail system as well as various planning goals. The distinction will have to be clarified.
- c. Apparently a project that is backed by outside funding will be viewed more favorably. We caution against the "trail for sale" temptation; a project should not be advanced on the basis of its funding alone. Nor should Step 3 be a "beauty contest," as suggested in the two presentations we have heard. Basic constraints should be anticipated before a project or cluster of projects undergo the more rigorous analysis in Step 4.

- d. We advise you to beware of undue reliance on models and numeric ranking. Weighting processes can be deceiving, giving cumulative scores the appearance of objectivity and precision when in fact weights are subjective and can easily distort outcomes.
- e. We question the validity of the listed social criteria, which seem arbitrary and unfounded; e.g., greater distance does not necessarily equate with increased opportunities for solitude, which, in Marin County, can be found surprisingly close to communities or trail intersections. Safety and the ability to “feel safe” (perception of safety) should be a key “social” consideration.
- f. Guidance from staff is critical at every step, and should not be specially called out in Step 6 when annual and multi-year work programs are prepared.
- g. We do not see any indication of trail types or standards in relation to user groups among the evaluation criteria. Design standards concerning gradient, drainage, use level, width, tread, etc. are listed for evaluation of existing trails and roads, but use type and frequency of such use are not included. These should be part of evaluating both existing trails and new roads or trails.
- h. How will the RTMP decision process intersect with the Measure A decision process? It appears that three different groups in addition to staff will review potential projects: the Road and Trail Committee (self-appointed by interested stakeholder groups), the Parks and Open space Commission (existing, selected by BOS), and a Citizen Advisory (to be appointed by the BOS?). The relationships, sequence of review, and authorities must be defined.

**3. Which proposed road and trail visitor use management policies do you favor, and why?**

- a. Without listing individual policies, we favor all policies that support the high level goal in the 2008 Strategic Plan, quoted on Page 7-1 of the Preliminary Draft RTMP: “. . .provide insight into better maintenance and management practices that will contribute to the protection, restoration, and enhancement of natural resources that have been adversely affected by poor road and trail alignment or construction, and concentrated visitor use.” All policies that are designed to foster this goal, such as avoiding sensitive resources, decommissioning redundant roads and trails, restricting access to non-system trails, and many more, support this goal. Why is this goal not listed as the first guiding principle in 8.2?

The “why” is self-evident: Marin’s open space preserves have been acquired painstakingly over several decades for the purpose of preserving a legacy for future generations and protecting the habitats of the plants and animals who share our environment. It’s not just for us! Increasing pressure for recreational use, in some cases highly concentrated around certain trailheads, now compromises that long-term obligation and calls for aggressive care and maintenance if the resources are to survive in good condition. We not only favor

but insist on prioritizing resource protection. Healthy recreation need not be provided at the expense of land health.

- b. We also favor those policies that focus on protecting user safety and experience, such as in RTMP.SW. T8, 9, 10, and 11. We will say bluntly, however, that single paths (narrow trails, single-track trails, foot paths – whatever the term) are *not safe for multiple users as they are currently designed and used*. If, as revised Policy T1d states, “MCOSD will permit bicycling on trails designated for their use,” it will take a combination of design, signing, management, and enforcement approaches to make such trails safe for other users. We advise against trying to accommodate all users on narrow paths, regardless of other design features or management approach.

**4. Which proposed road and trail visitor use management policies do you have concerns about, and why?**

- a. The four visitor experience management zones, covered in Chapter 8 (Policies) attempt to aggregate information on conditions such as presence of natural resources (e.g., Legacy Zones), levels of visitor use, present conditions of roads and trails, etc., and frame management policies and desired future conditions appropriate to that zone. Unlike the Vegetation Management Zones, which are generalized from specific occurrences of habitats, sensitive species, and so on, the visitor use zones are highly generalized, covering entire preserves in some cases. We caution against overgeneralization, especially in zones 3 and 4, where the management direction is toward increased multiple uses with limited to minimal restrictions. Decisions in these zones must be tempered by identifying and avoiding the sensitive resources that do exist within them, even if not in as great abundance as in zones 1 and 2.
- b. Policies concerning parking around trailheads are listed as P1 through 5. While they encourage alternate transportation and avoidance of concentrating access, they do not address impact of recreational parking on local residents. Such policies may appear elsewhere, but they should be more thoroughly addressed in the RTMP. Stories abound of abuse of private property by dogs, hikers, bikers, etc. around popular access points. Parking concerns should be part of the project evaluation process.
- c. Policies concerning organized recreational activities or events (RTMP.SP. 2 and 3) call for particular scrutiny. Currently MMWD lands are used for high school bike team training – groups up to 15 or 20 or more train as a group, presumably under supervision. Any attempt to take this kind of regular and frequent activity onto preserves should, in our view, be accompanied by strict rules on speed, frequency of use, even posting of areas where the activity cannot take place, and enforcement of rules. We are aware that bike teams are well-coached on trail rules and etiquette, but the impact of a group of cyclists on other users can be overwhelming and hazardous. If, as some predict, the organized mountain biking industry expands,

“new” policies and rules will be needed to ensure that such group use is not only regulated for safety but also is held responsible for fees to the land management agencies whose trails bear the wear and tear of such use.

- d. The purpose of policy TL-2.g is to “Promote harmony among trail users.” We welcome any efforts on the part of the Mt. biking community (recognizing that not all Mt. bikers are alike!) to establish a culture of courtesy and compliance based on the universal Yield sign. However, long history tells us that “Yield” is more often honored in the breach! It is incumbent on leaders in the biking community to create a culture that respects and actually does yield to slower users. Education alone will not accomplish this culture. Enforcement of regulations should be a specific part of the RTMP. At this point it shows up only as a weak policy TRL-2.p, which only “encourages” trail managers to enforce codes, etc. We suggest a stronger new system-wide policy to this effect.

A related safety issue concerns the community of commercial dog-walkers, who also must be held responsible for creating a culture that is mindful of the safety of others and adheres to regulations governing their activities.

**5. What issues that are of concern to you do you feel have not been addressed by this Preliminary Draft RTMP? Please explain.**

- a. Reference is made to the Los Angeles County Trails Manual in 7.3, presumably as a source of standards and design specifications, but the manner in which they will be “adopted” is not clear. In turn, other standards are referenced in the L.A. County Manual, notably those of California State Parks, using different classification system, different widths for different trail types or classes, and specific to user groups. We note, in consulting the L.A. Manual that all trails in L.A. County are open to multi-use (in contrast to L.A. City open space and parks). The manual does not discuss user groups or relationships among/between them. It does not consider management mechanisms to separate incompatible users in space or time of use or direction of travel, or any other such mechanism that may have to be considered in the RTMP if trails are to be designated for multiuse. What parts of this Manual will be “adopted” or used by the RTMP?
- b. The RTMP contains a comprehensive catalogue of BMPs (similar to State Parks’ Standard and Special Project Requirements) to avoid sensitive resources such as species or streams, to ensure sustainability, etc., but it lists none for basic safety. Such measures, whether structural, vegetative, or management in nature, need to be explicitly listed in relation to the particular recreational use for which they are designed (e.g., speed control devices for bicycles, design for line-of-sight for all users).
- c. Please reconcile conflicting statements and policies that call for narrowing roads to trail width (which is what ?) on the one hand, but encourage multiuse by Mt. bikes

and equestrians on “wider” trails. At the present time, the only width that safely accommodates both user groups, assuming good line-of-sight, is a 12 to 20-foot fire-road. A current plan to convert a narrow trail in Samuel P. Taylor to multi-use has established 48” as a safe tread width, even though the trail traverses steep side-slopes with no escape or provisions for passing. All empirical evidence suggests that this is *not* a safe *width in this location*, in spite of adopted standards (by State Parks). Please define user trail standards in the RTMP so that they can be evaluated in the final draft.

- d. Night riding has become a popular bikers sport, generally in groups. The activity encourages a particularly aggressive form of riding. The riders feel free to take on any trail with no limits, with obvious impacts to trails that otherwise are used largely by hikers, and with unknown impacts to nocturnal wildlife. Further, night riding is not consistent with adjacent open space lands managed by State Parks and MMWD. Some effort at coordination for the sake of consistency is essential. The RTMP should establish a firm policy: In our view, preserves should be open from ½ hour before sunrise to 1/2 hour after sunset, and be free of intrusion at night, as always with enforcement. We request that the origin of the 24-hour bike-riding activities that appear to have become informal “policy” be investigated and the practice be prohibited.

## **6. What else do you want us to know or consider as we move forward?**

- a. The Preliminary Draft RTMP is a significant accomplishment! For the first time the County has a comprehensive inventory of the conditions and resources that make up its 34 Open Space Preserves. We recognize that some things will change, and that user groups will need to work together to ensure that no one is displaced, that natural resources are not compromised, and that the preserves continue to offer everyone respite.
- b. Marin County Parks staff has made a great effort to reach out to the public in workshops, in discussions with stakeholders, in collaborative style, and so on. But most of that public consists of a limited number of people committed to following the process. The real public is latent – residential communities neighboring an OSP, a local resident walking her dog, or others near-by who will not know a favorite little trail has been decommissioned or put off limits until the day it happens. The staff must make every effort to bring the RTMP down to local ground level.

**Submitted online and via fax by:  
Marin Conservation League**

**Susan Stompe, President  
Nona Dennis, Chair, Parks and Open Space Committee**