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January 15, 2016

Superintendent Lenhertz  
Golden Gate National Recreation Area  
Attn: Redwood Creek Trail  
Bldg. 201, Fort Mason  
San Francisco, CA 94123

**Subject: Redwood Creek Trail Realignment and Dias Ridge Trail Extension Project: EA/IS**

Dear Superintendent Lenhertz:

Thank you for the opportunity to comment on the subject project and its Environmental Assessment and Initial Study. Marin Conservation League especially appreciates the almost 11-month public process by both NPS and California Department of Parks and Recreation ("State Parks") that has led up to this decision point. Review of that process, including scoping comments and responses and the EA/IS, reveals that the two sponsoring agencies have provided numerous opportunities for public input, been sensitive to public concerns, and worked with the affected recreational users and public in a good-faith effort to resolve them. The EA/IS also demonstrates that the agencies have incorporated all possible environmental "best practices" to insure that the extended construction phases will have minimal impact on the sensitive fish and wildlife species that inhabit the Redwood Creek corridor.

The realignment and reconstruction of the Redwood Creek Trail (RCT) addresses serious and long-standing environmental issues, such as direct encroachment by horses into the Creek, disruption of the natural flood plain and its riparian habitat by the trail, and chronic sediment-laden runoff into Redwood Creek due to trail erosion. The realignment, when completed, will also make possible safe and comfortable year-round use by both equestrians and hikers. This will especially benefit the resident (as well as visiting) equestrians, who have worked hard to maintain their place in the historic culture, natural environment, and recreational landscape of GGNRA. The extension of the Dias Ridge Trail also will benefit users of that trail by removing them from unsafe travel along the shoulder of Highway 1. Therefore, it makes practical sense to consider carrying out the two projects at the same time.

Residual Concerns

Notwithstanding all these benefits to be achieved with implementation of the project, MCL has three residual concerns that are not adequately addressed in the EA/IS and we believe must be considered to avoid unintended consequences that can accompany even the most beneficial of projects. These are noted in the following paragraphs.

PHONE: 415.485.6257  
FAX: 415.485.6259

EMAIL: [mcl@marinconservationleague.org](mailto:mcl@marinconservationleague.org)  
WEB: [marinconservationleague.org](http://marinconservationleague.org)

ADDRESS: 175 N. Redwood Dr., Ste. 135  
San Rafael, CA 94903-1977



**1. Need to anticipate the possibility of user conflicts and install features to avoid them.** Three user groups – equestrians, hikers, and mountain bikes – enjoy the network of trails in GGNRA and Mt. Tamalpais State Park in the vicinity of the RCT. Not all trails are open to all users, and equestrians limit themselves to trails they consider safe. Dias Ridge Trail was constructed as a multi-use trail for all three, and the extension will continue this shared use to the connection with the RCT, where mountain bikes are restricted from use. It is essential that features be included in construction that insure safety for all users at and near this connection, e.g., a barrier or sequence of “pinch points” (not just a large sign) that forces bikes to slow to a walking speed and diverts them away from the RTC, without impeding equestrians. Furthermore, the Dias Ridge Extension project should include design elements on the existing Dias Ridge Trail that force bikes to slow as they approach the extension itself, so that there can be no chance encounters with equestrians or walkers. The “S” curves on the Dias Trail are inherently hazardous for shared use, especially by equestrians. The extension project gives the opportunity to carefully examine the existing Dias Ridge alignment and correct inherent hazards above the trailhead at Muir Beach, near the Golden Gate Dairy property. We assume that ongoing discussions with Ocean Riders will achieve a safe solution.

At least one trail intersecting with the RCT is closed to shared use including bikes and is signed accordingly – e.g., the north Miwok Trail. Unfortunately, this does not deter mountain bikers from using this trail; regrettably unsafe behavior continues and defies attempts at enforcement. Illegal bikers making the final descent of the north Miwok as it meets the RCT are not visible to persons on the RCT, nor are RCT users visible to them. The RCT must be designed so that this intersection, illegal though it may be for bikes, does not pose a continuing hazard for either hikers or equestrians on the RCT. This could involve installing a partial barrier at the intersection that would force anyone riding a bike to come to a halt (and ideally walk his/her bike to the end of the RCT at Muir Woods Road). The EA/IS proposes installing larger signs on the RCT; this strategy should also include larger signs at the upper end of the north Miwok near Panoramic, but we question the effectiveness of large signs! The only other alternative would be more effective enforcement of trail restrictions by both agencies.

**2. Parking and access to trails.** Currently the RCT can be accessed from Muir Woods Road at either end, or roughly midway at Santos Meadows. Informal trails from the road will be decommissioned. The EA/IS appears to assume that hikers will park along Muir Woods Road but is silent on this subject, except to say that “Issues related to traffic and parking on Muir Woods Road in general are being addressed through planning for the National Monument” (Page 6), and “Parking and access to the trail would remain the same as existing conditions.” (Page 49) We question the accuracy of these statements; we have not seen any mention of parking for the RCT in the MOU concerning parking for the Monument, under which parking will gradually be eliminated from Muir Woods Road over a period of several years. We assume this could include eliminating roadside parking in the vicinity of the RCT trailhead opposite Deer Park Fire Road. How then will

State Parks provide convenient parking and access for trail users, since most of the trail is within Mt. Tam State Park? At the Muir Beach trailhead, informal parking for the trail occurs along the west side of Muir Woods Road within GGNRA. Will this parking be adequate for a trail that inevitably will increase in popularity with the planned improvements? Much further removed, informal parking occurs off Panoramic at the trailhead for the Dias Ridge and Miwok Trails. This is for people taking more extensive hikes or bike loops, however. The EA/IS does not specify how or where RCT users will park their cars. Parking and pedestrian access to the RCT need to be carefully reconsidered in final design, to avoid impacts to the Creek itself, and to avoid unsafe conditions in adjacent neighborhoods.

**3. Miscellaneous issues.** Finally, from conversations with Ocean Riders and other equestrians who enjoy the RCT and have participated for years in maintaining the trail and in efforts to improve it, MCL has learned that there are some concerns about the number of bridges and their safety for horses. In view of the fact that riders have refrained from using the trail during salmon spawning season to avoid crossing the gravel fords during spawning and have few alternative year-round safe trails open to them in the area, we urge you to continue working to ensure that their specialized needs are met. The Golden Gate Dairy has earned a ten-year permit to continue offering equestrian recreation in GGNRA, and its concerns deserve attention.

Again, MCL thanks the NPS and State Parks for an extended public process. The RCT is one of the most pleasurable trail routes in Southern Marin. We look forward to resolution of our remaining concerns, and to a successful project.

Sincerely,



Kate Powers,  
President



Nona Dennis,  
Chair, Parks and Open Space Committee