

October 21, 2011

James Raives, Senior Open Space Planner
Marin County Parks
3501 Civic Center Drive, #260
San Rafael CA 94903



SUBJECT: Negative Declaration – Stafford Lake Bike Park

Dear Mr. Raives:

The Marin Conservation League (MCL) has monitored the development of plans for the Lake Stafford Bike Park. We have reviewed the recently released Negative Declaration and offer the following comments.

EROSION

The introduction of a Bike Park at the site defined by the Negative Declaration creates significant impacts resulting from erosion of soils and biomatter that could eventually get into Stafford Lake.

The Negative Declaration briefly describes the erosion that will take place, with an emphasis on erosion that might occur during construction. We believe that there are greater impacts from operation of the bike park long after construction is complete. Erosion control features need to have expanded explanations and graphics so that the reader can have a firm grasp of these features. Added information of operational erosion control would include:

- Define the function of a bioswales and bioberms. Show cross-sectional drawings
- Describe the function of the woodchips. What is the mechanism that causes failure of this feature after a season of operation?
- What are the design considerations of the Bio-retention feature? What is the expected life of this feature? If dredged, where are the spoils to be dumped?
- The annual cycle for erosion caused by agriculture activities and the experience with the Pleasure Faire should be contrasted by Bike Park operations. With Ag operations the slopes are covered by a thick pad of dry grass or if hay is harvested, the ground is covered with stubble. The Pleasure Faire did not operate on steep hill sides. The fair's short operation resulted in a thin layer of dust being generated. In contrast the Bike Park will be in operation year round so that much larger quantities of dust will be gen-

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erated. It is this dust that gets washed into the lake at the first heavy rain runoff. Will there be seasonal closure if damage to the track or function of the bioswales and retention features develop?

- There are a number of bike parks in the area, as mentioned in the traffic study. Photo sequences of the wear of the operating parks.
- Mitigation Measure Hydro-3 dictates testing for only 2 seasons. We believe that testing should be conducted annually for the life of the park.
- Wetland delineation should have been done before this document was released to provide an opportunity for public review of proposed mitigation.
- Oaks within the park boundaries are to be protected during construction, but there are no protections identified during the operation of the Bike Park.

NESTING BIRDS

We believe that nesting birds during the operation of the park should be afforded the same protection as birds in the area during construction.

TRAFFIC

Many road bikers prefer to ride on the road pavement instead of the Class A bike path that exists along the side of the lake. As traffic increases, there will be a growing chance of collisions between bikers and drivers. Traffic management measures should be planned for the stretch of Novato Blvd. that has blind curves and no shoulder.

Thank you for considering these issues.

Sincerely,

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

Susan Stompe, President