

June 28, 2011

Brad Michalk
California Department of Parks & Recreation
Northern Service Center (CDPR)
One Capitol Mall, Suite 500
Sacramento, CA 95814

RE: Bill's Trail DEIR

Dear Mr. Michalk:

The Marin Horse Council, Inc. (MHC), founded in 1981, is a California non-profit organization dedicated to preserving the horse in the landscape and lifestyle of Marin County. Recent professional surveys have shown the annual equine economic impact in Marin County to be slightly over \$100 million for direct goods and services. In addition to representing equestrian interests to diverse public agencies, the MHC annually presents well-attended educational and recreational events. Two of our major concerns are the safety of equestrian trail users and the preservation of a healthy environment and resource.

Towards those ends, the MHC has participated as an "amicus curiae" in successful court actions to block unsafe and environmentally-unsustainable Marin trail use plans proposed by agencies or bicycling groups. California Department of Parks and Recreation (CDPR) is well aware of such actions, including our letter of 27 March 2009 to CDPR Director Ruth Coleman, opposing mountain bicycle use of Bill's Trail in Samuel P. Taylor State Park (SPTSP). We find it baffling and unacceptable that the MHC was not informed in a timely manner of the March 2011 Bill's Trail DEIR which again proposes allowing mountain bicycle use of this steep and narrow footpath. We learned of the DEIR second-hand. We cannot understand CADPR keeping an interested stakeholder out of the due process. The MHC is grateful to its environmental partner, the Marin Conservation League, in securing an extension of the comment period until 1 July 2011.

It should be noted that at its lower exit, Bill's Trail is adjacent to a long-established horse camp, Devil's Gulch Horse Camp. Members of the MHC have enjoyed these camping facilities for decades. Junior riders, including members of 4-H groups, have been safely and competently instructed in horse camping and trail riding, an art which carries life-long benefits. A few years ago, the MHC repaired the camp pastures and installed a large manure bunker at Devil's Gulch H.C. at its own expense and labor and with the blessing of the district park supervisor. The MHC pays for the periodic cleaning out of the bunker. Years ago the MHC offered to help maintain Bill's Trail, an offer that was never accepted by the park. Regardless of that, for decades the MHC has worked with, contributed to, and supported, our local state parks system.

In its letter of 27 March 2009 to DPR Director Ruth Coleman, the MHC strongly opposed the initial proposal to open Bill's Trail in SPTSP to mountain bicycles. A reading of the current 2011 DEIR shows over a dozen areas in which it is deficient and/or shallow in addressing essential factors of multiple-use (hiker, horse, bicycle): soil type; local climate and rainfall; slope and topography; local ecosystems, wildlife, and vegetation; trail use history; creation of an unsustainable trail use attraction; trail design; area overnight use/camping; lack of agency oversight and enforcement of regulations; vehicular control of speed; alleged equine impact on trails; and existence of satisfactory, alternate trail systems for providing recreational loops. If the DEIR is so demonstrably deficient in discussing these impacts in



detail, there can be no credible or acceptable conclusion that mountain bicycling on Bill's Trail would present no serious problems to the environment, to other trail users, or to wildlife.

The Marin Horse Council is especially cognizant of the safety hazards that are presented by mountain bicycles to other trail users. These hazards would be especially applicable to the steep, winding, narrow footpath of Bill's Trail. The DEIR itself acknowledges the dangers presented by fast mountain bicyclists by proposing one hundred "pinch points," naively expecting that curves, logs, etc., will force bicyclists to slow down. This ignores the filmed and recorded habit of mountain bicyclists to use vehicular suspension systems to bank off curves and ledges and to launch their bicycles over and beyond any obstruction and go ever faster. The DEIR virtually ignores the serious topographic element of this area: blind corners from one end to the other, coupled with thick, lush vegetation to further obscure other trail users to downhill speeders. There can be no changing or mitigating these natural folds and there is no money to constantly cut back the natural growth - which latter would destroy the trail's beauty.

Bill's Trail is a favorite of senior citizen hiking groups because it is ideal for their physical limitations. Young children delight in running here and there and stopping to examine a flower or plant. No responsible adult will allow this scampering if bicycles are allowed on Bill's Trail. Horsemen and hikers are eminently compatible on Bill's Trail and it is ideal for this type of dual use. If bicycles are allowed on this trail, horsemen, slower and disabled users, and most "foot people" - all but the most agile and daring - will inevitably be displaced because of fears for personal safety. This is exactly what has happened in China Camp State Park in San Rafael. In its booklet, "California Recreational Trails Plan - June 2002," CDPR acknowledges that "While there has been some integrating or combining of different recreational user needs on individual trails, the efforts have not been universally successful." (p. 25). In the experienced and considered opinion of experts within our membership, allowing mountain bicycles on Bill's Trail would set the scene for disastrous conflict and injury to other users.

The upper access to Bill's Trail is from the Mt. Barnabe Fire Road which has been in multiple-use for decades. The MHC supports shared use of wide dirt fire roads. This fire road has lower forks providing access to campgrounds and is a part of established bicycle loops from the Old Railroad Grade and the eastern fire road access up Mt. Barnabe. There is NO compelling reason for subjecting the fragile environment, native wildlife, special status species, and slower trail users to the dangers and impacts of bicycles. Because mountain bicyclists *want* a trail does not warrant opening it to their demands. Note that no one is restricted from a trail. Bicyclists can leave their vehicles at home and enjoy Bill's Trail on foot.

This DEIR is already being circulated on bicyclist websites as presenting a "done deal" in making Bill's Trail a future mountain bicycle trail. The plan is being heavily advertised and promoted as a destination for mountain bicyclists and as a springboard to other bicycle-access projects, worthy or not. What will CDPR do to ensure that mountain bicyclists will not take over the trails in Taylor Park? What controls does CDPR propose to monitor, regulate, and maintain the "pinch points" being proposed to "slow" downhill bicycles? SPTSP is one of the four parks in Marin County scheduled for closure because of a low budget. Why is the expense of renovating this trail for bicycle use, thereby ruining it, even being considered?

The MHC flatly rejects the one-sided allegations and claims in this DEIR that equestrian use causes significantly greater impact on trails than bicycles. In 1998, the group known as EnviroHorse was founded to act as a collection and dissemination agency for peer-reviewed, published research on the horse in the environment. We direct CDPR to its website,

www.californiastatehorsemen.com/envirohorse.htm.

The ancient Roman, Pliny, wrote that nothing is more conducive to erosion than a line inscribed on the ground - in modern days, that's exactly the continuous 2" wide track of a bicycle wheel. The Wilson-Seney report cited in the DEIR uses deeply flawed methodology (using a water hose on a four-foot section of flat trail in Montana!) in reaching its conclusions, now widely discredited. Other reports (Lanza, Pickering) are misquoted, site-specific, and have their statements taken out of context to "support" the DEIR's assumptions. The claim that horses drop 50 lbs. of manure (recycled vegetation) daily dates back to Dept. of Agriculture studies in 1900-1910 on draft horses on farms. As well as being currently erroneous, the allegation is irrelevant to the DEIR. There is no credible peer-reviewed research on the true comparative user impacts on trails. Such research would be site-specific and results would be non-transferable to other parks. On the other hand, research (USDA and Oregon F&W) exists to show that mountain bicycles cause a greater flight response from wildlife than either horseback riders or hikers ("Effects of Off-Road Recreation on Mule Deer and Elk," Wisdom, Preisler, Cimon, Johnson 2004.) The DEIR fails to take into account the damage to be anticipated from the increase in volume of bicycle traffic that will take place if Bill's Trail is opened to bicycles. One has only to look at China Camp State Park in San Rafael, where heavy bicycle usage of its narrow trails has created ruts, gullies, skid marks, and deep dust and detritus.

The DEIR's statement that horse hoofs have an impact of 62 psi is absurd on the face of it. Is the horse standing, walking (4-6 mph), or trotting (6-10 mph)? (Equestrians do not canter on Bill's Trail). With an average hoof area between 15 and 20 square inches, and with four legs to suspend its weight, 62 psi would result in a horse weighing over 3,700 pounds! The weight of an average saddle horse is 1,000 lbs.; a walking horse has either two or three feet on the ground at all times and a trotting horse, two feet plus a suspension phase. There is no denying that horses contribute a share to trail wear, but the imprint of a hoof is just that - an imprint, at times containing rainwater that eventually percolates into the ground. Any soil condition that accepts the print of a hoof will also retain the track of a bicycle tire - and horses do not go skidding around corners. The Devil's Gulch Horse Camp has been rented to horsemen for decades and there are few discernible impacts from horses on Bill's Trail.

The DEIR substantially errs in rejecting other alternative uses of Bill's Trail as infeasible. CEQA itself defines **feasible** as "capable of being accomplished in a manner, within a reasonable period of time, taking into account economic, environmental, social, and technological factors..." The alternatives in this DEIR are:

3.2.2.1 - Bill's Trail Maintenance Only

3.2.2.2 - Bill's Trail and Gravesite Fire Road Maintenance

3.2.2.3 - Exclude Equestrian Use

3.2.2.4 - Close and Rehabilitate Bill's Trail.

The Marin Horse Council wishes to go on record as strongly opposing the opening of Bill's Trail to mountain bicycles in any manner. Historically, there is a well-documented incompatibility of mountain bicycles with other slower trail users on narrow trails and safety hazards throughout the state. In fact, the first known death of a horse resulting from speeding mountain bicycles on trails was at Annadel State Park when several mountain bicyclists blasted through a group of equestrians, causing one horse to bolt and break a leg (Santa Rosa Press-Democrat, 21 Aug. 1989). For obvious reasons, the Marin Horse Council rejects Alternative 3.2.2.3 - Exclude Equestrian Use - as being without merit and in opposition to long-established, safe horse use of Bill's Trail. The Horse Council supports two alternatives: 3.2.2.1 - Maintenance Only, or, our preferred alternative, 3.2.2.4 - "Close and Rehabilitate Bill's Trail with

continuing availability to the hiking and equestrian community.” How these alternatives will be achieved in the face of severe state-wide park budget cuts is not described.

The Marin Horse Council requests that we be kept informed of all future state park proposals in Marin County and specifically those documents and decisions pertaining to Bill’s Trail. Thank you for the opportunity to comment.

Sincerely,

Joel Bartlett
President, Marin Horse Council

cc: Danita Rodriguez, Superintendent, Marin District
Joanne Danielson, Superintendent, Marin Sector
Assemblyman Jared Huffman
Directors, Marin Horse Council
Board of Supervisors, Marin County