



MARIN COUNTY BICYCLE COALITION

November 30, 2019

Cicely Muldoon, Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

Re: Point Reyes National Seashore General Management Plan Amendment — Draft Environmental Impact Statement Scoping Comments

Dear Superintendent Muldoon,

Marin County Bicycle Coalition (MCBC) greatly appreciates the opportunity to comment on the Environmental Impact Statement (EIS) scoping for the Point Reyes National Seashore and North District of Golden Gate National Recreation Area (PRNS/GGNRA) General Management Plan Amendment (GMP Amendment).

Founded in 1998, MCBC's mission is to promote safe bicycling for everyday transportation and recreation. Our comments reflect key organizational objectives:

- Expand trail access and connectivity.
- Ensure the protection of natural habitats when building and maintaining trails.
- Educate trail users how to have safe and friendly interactions.
- Connect Marin communities through pathways, protected bike lanes, and neighborhood streets.
- Improve safety on Marin's rural roads.

PUBLIC ACCESS & PLAN ALTERNATIVES

As you know, much of the PRNS trail system resides in designated wilderness, which prohibits bike access. Hikers and equestrians enjoy over 100 miles of trails in the Seashore that will continue to remain off-limits to people on bicycles, which is why MCBC views the GMP Amendment as a critical opportunity toward expanding recreational opportunities to PRNS/GGNRA public lands.

To this point, we were pleased to see NPS call out improved “hiking, biking, and equestrian access” and trail opportunities that “would focus on loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape” as elements common to all action alternatives in the PORE Public Scoping Newsletter. We believe our recommendations share these characteristics.

While identifying a preferred alternative is outside of our organization’s scope, we oppose Alternative A (no action) on the basis that it does not expand or improve public access on leased lands.

RECOMMENDATIONS

Establish a new trail between Devil’s Gulch and Platform Bridge Road through the Cheda, Mclsaac, and Zanardi Ranches.

Key Benefits:

- Creates connectivity with existing trails in Samuel P. Taylor State Park
- Facilitates north-south connectivity
- Expands trail access while enabling cyclists to stay off the road

We see a great opportunity to create a new multi-use trail in the North District GGNRA ranchlands between Devil's Gulch Trail in Samuel P. Taylor State Park and Platform Bridge Rd. near the intersection of Petaluma-Pt. Reyes Rd. through the Cheda, Mclsaac, and Zanardi Ranches. While it may be possible to achieve most of this route using existing ranch roads, we strongly encourage NPS to review and consider new trail construction to 1) provide a more gradual trail experience that avoids some of the steepest climbs, and 2) to close gaps where roads leave GGNRA lands.

Create a plan to connect the Cross Marin Trail into Point Reyes Station.

Key Benefits:

- Creates connectivity with Samuel P. Taylor State Park
- Facilitates north-south connectivity
- Extends a popular pathway that is accessible for users of all ages and abilities and enables people to stay off the road

The vision for the Cross Marin Trail--an off-street pathway along the former Northwestern Pacific Railroad right-of-way from Pt. Reyes Station to Central Marin--dates back to the 1970s. Though much of the right-of-way through San Geronimo Valley has been sold off or used for roadways, the pathway--which currently runs through Samuel P. Taylor State Park--could be extended from its current western terminus at Sir Francis Drake Blvd./Platform Bridge Rd. through

GGNRA lands toward Pt. Reyes Station. There is one parcel between Platform Bridge Rd. and Point Reyes Station that remains in private ownership, but the County is currently studying options to connect this segment.

This project was included in the Marin County Unincorporated Area Bicycle and Pedestrian Master Plan, which was adopted in February 2018 ([see project #43 on pg. 5-14](#)).

Adopt an existing social trail between Bolinas Ridge and Olema.

Key Benefits:

- Creates connectivity between several parks (Samuel P. Taylor SP, MMWD Watershed, GGNRA), as well as Bolinas Ridge, Olema, and Bear Valley
- Expands trail access while enabling cyclists to stay off Sir Francis Drake Blvd. over Olema Hill

Park visitors currently use a cow trail that follows a powerline between Bolinas Ridge Trail and the town of Olema. This social trail could be improved and added as a system trail to improve connectivity.

Adopt an existing ranch road between Bolinas Ridge and Five Brooks through Lupton Ranch.

Key Benefits:

- Creates connectivity between several parks (Samuel P. Taylor SP, MMWD Watershed, GGNRA), as well as Bolinas Ridge and Five Brooks
- Creates a loop between the northern terminus of Olema Valley Trail and Bolinas Ridge
- Expands trail access

There is a ranch road through the Lupton Ranch that creates a natural east-west connection between Bolinas Ridge and Five Brooks. We recommend adopting the road with enhancements to close a gap between Bolinas Ridge and the Olema Valley Trail.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Key Benefits:

- Expands trail access while enabling cyclists to stay off a particularly dangerous stretch of Highway 1
- Facilitates north-south connectivity between Olema and Bolinas

While outside the planning area, extending the Olema Valley Trail would address safety for people on bikes, foot, and horseback by getting them off Highway 1 between McCurdy Trail and Bolinas. We respectfully request for the connection to be considered as part of this process.

Close gaps for bikes through ranchlands, including 1) the Estero Trail loop, 2) a connection between Sir Francis Drake Blvd. and Pierce Point Road, and 3) a connection between Marshall Beach and Pierce Point Road.

Key Benefits:

- Expands trail access, enabling cyclists and hikers to traverse ranchlands without using roads
- Facilitates north-south connectivity

As part of this recommendation, we're requesting improvements and trail designations to establish three new loops:

1. Estero Trail: Build a new trail segment at Drakes Estero (from Estero Trail to the north end of White Gate Trail) to provide a loop for all users. This would reduce the chances of visitors using the private road through Home Ranch.
2. Sir Francis Drake-Pierce Point: Create a trail connection between Sir Francis Drake Boulevard and Pierce Point Road through Rogers Ranch, M Ranch, and H Ranch using a combination of existing ranch roads and new trail construction.
3. Marshall Beach-Pierce Point: Designate the ranch road that connects Marshall Beach with the northern bend on Pierce Point Road as a multi-use trail.

Establish a more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

It is our understanding that no organized bicycle events are permitted in PRNS/GGNRA's Northern District. We believe this policy is outdated and not aligned with PRNS' original intent to "save and preserve for purposes of public recreation, benefit and inspiration." We would request that PRNS/GGNRA amend the permitting policy to allow a minimum of six bicycle events per year.

Open bike access to all ranch roads in the pastoral zone that are already open to hikers.

Generally speaking, we have done our best to suggest projects that would have little or no impact on active ranching operations. In cases where trail alignments traverse grazing lands, we suggest the EIS include mitigation measures such as self-closing gates, signage asking users to stay on the trail, and education. Bolinas Ridge Trail provides a good template for an existing trail that traverses grazing lands.

IMPLEMENTATION

MCBC's Off-Road Program was established on three guiding principles: education, environmental stewardship, and expanded opportunities for mountain biking. We frequently partner with agencies and organizations on trail stewardship and educational programs, and stand ready to do the same with NPS.

Education & Safety

As a founding member of Trail Partners, we helped develop the *Slow & Say Hello* campaign based on our knowledge of trail-sharing initiatives and incentives. We have installed 1,500 bike bells at trailheads throughout the County and advocated for policies and best management practices to ensure safety and mutual respect among all trail users.

Trail Improvements & Maintenance

Following years of mobilizing thousands of volunteers for trail maintenance efforts, we recently launched MCBC Trail Stewards to foster the next generation of trail and habitat restoration stewards. Since the opening of the Dias Ridge Trail in GGNRA, MCBC volunteers have returned each year to care for the trail and maintain safety features.

Funding

For projects requiring significant capital funding, such as the Cross Marin Trail, we are eager to assist in identifying grant funding opportunities and support funding applications. MCBC has helped bring millions in bike/ped funding to Marin County, including a recent \$1.2m award to the City of San Rafael for a pathway project.

CONCLUSION

All of the recommendations outlined above were suggested by MCBC members or local residents and vetted by MCBC staff. We respectfully request that the EIS includes and evaluates our recommendations, each of which would greatly enhance the visitor experience and access to our public lands. We would look forward to meeting to discuss our proposals in greater detail.

Respectfully Submitted,



Jim Elias
Executive Director
Marin County Bicycle Coalition