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Subject: Marin Conservation League (MCL) Comments for Trail Designation at Ring Mountain:

Dear Jon,

Marin Conservation League (MCL) appreciates the opportunity to comment on the draft trail designation of Ring Mountain Preserve. We acknowledge the impressive collaboration you have developed on the project over the last 3 years. The environmental community has been included every step of the way, and we realize that you have reconfigured the Loop Trail at least three times as you evaluated potential impacts of the reroutes.

MCL recommends that Marin County Parks and Open Space (MCP):

- 1) Examine a project that stabilizes the existing loop trail
- 2) Analyze the existing social trail network in more detail
- 3) Complete more detailed study of the ecology of Ring Mountain
- 4) Increase protection of the natural resources through education, interpretive signage, and fencing prior to determining the need for new trail designations.

We address the "why" of each recommendation below:

- 1) The proposed alternative project to stabilize the existing loop trail will:
 - Remove the impact of realigning a new trail through undisturbed perennial grasslands, willow riparian thickets and other sensitive communities.
 - Eliminate the two new additional bridge crossings that fragment undisturbed grassland, riparian and oak habitat.
 - Likely require more structures, such as boardwalks and stairs, and more engineering in order to stabilize the areas above and below the staircase area. This new infrastructure is justified because the stairs appear stable, direct the use appropriately as users don't stray from the stairs, protect sensitive habitat and are the only stair trail experience at Ring Mountain.
 - Eliminate the need to attempt to redirect the existing strong use pattern on the trail.
- 2) MCL recommends that MCP analyze the existing social trail network in more detail before designating any trails. This analysis should include width, depth, length, hydrology, plant

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community presence and sensitive species. The existing trail map displays many social trails (https://www.parks.marincounty.org/-/media/files/departments/pk/projects/open-space/rtmp-projects/r6_comment_rimo.pdf?la=en). Those not to be designated are in red and those to be permanently designated are in black. On the ground, these trails vary greatly in ways not identified on the maps.

- Some social trails appear to be lightly used or have fallen into disuse and may have annual special-status plants that can germinate in the tread. These may be in the process of naturally revegetating and should not be considered candidates for designation.
- Some social trails are highly eroded, compacted and wide, and may stay as scars on the landscape long term and could be considered candidates for designation.
- Some black trails are stable, wide and compacted and may be easily designated with little impact.
- Some black trails are to be new trails cut through pristine grassland or other sensitive habitat, in new places that may be considered new impacts.
- Overlaying mapping of special-status species, Sensitive Natural Communities and soil types with this more detailed trail information will help provide the information for more ecologically sound trail decisions.
- 3) Complete more detailed study of Ring Mountain ecological processes to guide the designation process. Actions such as:
 - Conduct experimental trials of restoration techniques before implementing on a broader scale.
 - Gather geo-mapping data on special-status species and Sensitive Natural Communities for locations by aspect, slope, soil, hydric soils, etc. For example, a spring emerges just uphill from one of the proposed trail designations, which is also endangered species habitat.
 - Analyze the restoration technique that allows special-status species and Sensitive Natural Communities to reestablish on old trails. Some native species may better germinate in the open social trails that are less subject to weed competition.
 - Analyze the long-term trends and locations of the special-status plants and Sensitive Natural Communities. General information suggests some special-status species, especially annuals, may be declining. Compiling all the monitoring data over the last 33 years and writing up a trends analysis for this project is an important step in analyzing project approach and impact.
- 4) MCL recommends that a strong program to protect and interpret the natural resources at Ring Mountain precede trail designation. We are aware that MCP has already embarked on a program to change the culture of visitors. Many visitors have little idea what outstanding and internationally significant habitats are at Ring Mountain and may not respect new trail designations. Opportunities could include but are not limited to the following:
 - Install trail designation signs that let people know that they are or are not on official trails. Currently, it's impossible to know whether you are on a social trail or on an official trail. So even if folks wanted to be compliant, they currently aren't able to know how. Installation of more trail designation signs is a relatively inexpensive and non-

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invasive measure which should not have to wait until a complete and final trail plan is adopted.

- Re-publish the Ring Mountain Self-Guided Nature Trail that is in the Ring Mountain Management Guidelines that The Nature Conservancy developed, and distribute it to visitors of Ring Mountain.
- Install interpretive trail signs and panels describing geology, Native American use of the area, rare plant communities, wildlife, and overall sensitivity.
- Provide more natural and cultural resource information on the MCP website.
- Continue "coffee with a ranger" program, focusing more on natural and cultural values of Ring Mountain.
- Use fencing together with interpretative signage to protect the social trail area and identifying to hikers why it is necessary.
- Advertise public nature walks by staff or volunteers, and self-guided handouts.
- Consider signage to help lead people to a specific location to view protected plant species to discourage wandering about to find them.

The focus on natural resource protection, as considered in these comments, is fully supported in the Road and Trail Management Plan policies, including sections SW4, SW22, SW23, SW24, Serpentine Criteria, Average Trail Density criteria, and #62 Project Screening Evaluation Tool. Providing sufficient data and additional information to justify how each change in trail designation enhances environmental protection is critical.

Finally, regardless of which social trails are designated, enforcement and interpretation must be included. The most likely culprits for enforcement will be dog walkers with off-leash dogs, as well as hikers violating closures. Education and enforcement should be a permanent feature in managing the Preserve. These important actions are often overlooked in trail management and we encourage MCP to increase both.

Thank you for considering our comments. We look forward to continuing our work with MCP to protect the resources of Ring Mountain.

Sincerely,

Robert Miller President

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Terri Thomas Vice President

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Chair Parks and Open Space Committee

cc.

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