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July 15, 2012

Lorrie Bradley
Park Planner
County of Los Angeles
Department of Parks and Recreation
610 S. Vermont Ave
Los Angeles, CA 90020

Re: Comments on the Canyon Trail and Heritage Trail reviews

Dear Ms. Bradley,

Thank you for the opportunity to comment on the proposal to allow mountain bikes on the Canyon trail in Placerita Canyon Natural Area, and trails in the Vasquez Rocks natural area, as was formally requested by the mountain biking community in 2011. Having been involved with State Parks in the development and application of their Change In Use program and associated PEIR, we're pleased to see this objective process being applied to County-managed trails within these two natural areas.

The County has a long-standing policy prohibiting bicycles in natural areas which is mentioned in the opening paragraph of the Canyon Trail Assessment Report. We would like to know what the basis for this policy is, and how the policy was developed. The document in which this policy appears is referred to as the "Natural Area Staff Handbook." Is this a policy document, a set of regulations, or a set of guidelines? When was this policy implemented, and based on what data was the policy founded?

In several studies the resource impacts of bicycles have been found to be similar to that of hikers and less than that of equestrians. While we do agree that not all trails are suitable for bicycles, we believe this blanket prohibition of bicycles in natural areas is in need of review. For this reason, we commend the County for considering the opening of the trails in question to bicycles and the preparation of these draft reports.

As reported by [IMBA](#), on July 5, 2012 the National Park Service announced a change in their policy regarding mountain bikes. Published as [36 CFR § 4.30](#), the new rule moves bicycle access to trails in National Park units from a regulatory process to a planning process, effectively affirming that bicycles can be compatible with natural areas. In fact, the biggest issues regarding trails are not the type of user, but the design and alignment of the trail. This fact is borne out by the trail assessments of the two County trails in question, where both were found to be in need of design upgrades for sustainability and resource protection irregardless of the existing or proposed allowed trail uses.

The County's study cites the State's *Administrative Draft Trail Use Conflict Study*. We feel this is inappropriate in a number of ways. The quotes used are abbreviated, and have been taken out of the complete context of the report. The quotes used are generalizations, and we cannot glean the full context of that report since it is only an administrative draft. The quoted report has not been vetted through a public process as required by State law. At this time, these quotes should not be included in this report, nor be the basis of any decision regarding these trails or County policy in general..

The quotes state that "...trails are not designed or intended to serve as **active recreation** facilities..." [emphasis added]. We contest this categorization of off-road cycling as "active recreation." Off-road cycling has been characterized in the land use planning literature and by many land management agencies as "passive" recreation. The generally accepted definition of active recreation is an activity that requires activity-specific infrastructure such as football fields, swimming pools or other high-impact urban facilities. In land use planning literature bicycles on natural surface trails are generally considered a form of passive recreation.¹ CORBA will be commenting to this effect on this State document when it is released for public comment.

Under *D. Additional Considerations* (in both the Heritage and Canyon trail reports), the first point states that "The purpose of State Parks' trails is to provide opportunities for visitors to experience parks, while protecting the natural resource. The County provides trails for recreation, which is a different mandate and could result in different evaluation mandates." Under the second point, the general purposes of County trails is quoted from the trails manual as: "Trails offer multiple recreational opportunities to County residents and visitors, providing access to open space and related natural resources, and facilitating exercise, outdoor education, and opportunities to explore new environments." We fail to see how these two purposes are inherently different, since both State Parks and County Natural Areas both apparently share a mandate to protect the resource while providing for recreation. Further, these points appear on both trail reports, even though the Heritage Trail is not within a State Park unit.

Vasquez Rocks

In the case of the Vasquez Rocks Natural Area, the fact that there are no adjacent open space areas with bicycle-permitted multi-use trails will mean that Vasquez Rocks will never be a "destination" trail system for serious off-road cyclists. If bicycles were to be allowed, it will more likely be an added draw for families with young children, kids, and beginner cyclists, and for cyclists wanting to visit the natural area for its natural attractions.

A lack of connectivity from the Heritage trail was cited as one of the main contributing factors in the recommendation to not allow bicycles. Though the initial request was for access to "trails" within the Vasquez Rocks Natural Area, only the Heritage trail was studied. It came as a surprise to us that the Heritage trail is the only official County trail within the park. Given that a network of several miles of trails exists in the park, the bicycling community were confident that a trail route suitable for bicycles could be found. The fact that there are so many unauthorized "social" trails, and the report's characterization of the significant resource damage by existing users, indicates that there is a large demand for trail access to different points of

interest within the park that is not being met or managed by the County. This resource damage is not the result of bicycle use, and we contend that any additional impacts that might occur by allowing bicycles would be negligible when compared to the existing damage.

The County will eventually need to address this extensive resource damage and take an active stance on its mandate for resource protection of this Natural Area. When the County begins the task of rehabilitating the impacted areas, restoring the Heritage trail, evaluating existing social trails and adding new trails, we strongly urge that this be done according to the standards laid out in the County's trail manual for multi-use trails, in such a way that will bring them up to a sufficient standard to allow for an off-road bicycle route through the park.

Canyon Trail

CORBA supports the report's findings regarding the Canyon trail and its suitability for the addition of bicycles as permitted users after modifications to the trail. The fact that the trail was used by mountain bikers for over four years with no officially reported incidents or accidents supports the report's findings and recommendation.

Circulation and connectivity are important to bicycles and we are pleased to see that these have been appropriately considered in this draft report. The report does not, however, consider the state of the trails to which the Canyon trail connects nor the type of trails generally available in the area. In almost all cases, the local trails available for bicycle use are steep and provide a significant barrier to entry for beginner mountain bikers, youth and families wanting to ride bikes off-road. In addition to connectivity, we'd like to see mention of the relative grade/steepness and physical challenge presented by other trails in the area. The canyon trail is one of a very few in the Santa Clarita Valley that does not require a high level of fitness to travel by bicycle. Allowing bicycles on this trail will allow cyclists of all ages and abilities a less formidable place to enjoy the outdoors by bicycle.

The recommended improvements are divided into safety considerations for the addition of bicycles, and sustainability improvements regardless of allowed uses. We urge the County to prioritize the completion of the safety items (speed limits, signage, pinch points, slow speed zones, and sight-line improvements by brush removal) in order to allow bicycles to return to the trail sooner rather than later. We feel these changes are appropriate and can be effectively applied in such a way as to ensure the continued enjoyment of the trail by all users.

According to the L.A. County Trails Manual, "In order to preserve the recreational experience of a trail, features should be implemented to provide both traffic calming functionality along with an enjoyable experience." (pp. 4-12). We trust that the County will apply the pinch point treatments in accordance with its own trails manual to continue to provide "an enjoyable experience" for all trail users.

CORBA has been working with the State as it installs and assesses pinch points (referred to as "choke points" in the 2011 L.A. County Trails Manual) on the Tapia Spur trail in Malibu Creek State Park. These State-installed pinch points are comprised of large boulders brought in by motorized carriers at considerable expense. We feel this design of pinch point would be

unnecessarily burdensome for the County's needs on this trail, and the draft report does in fact call for "small pinch points." There are other ways to construct pinch points with considerably less impact and cost. CORBA and the mountain biking community at large would be willing to work with the County and other trail user groups on pinch point design, placement and installation, in order to expedite the work.

State Parks, the Mountains Recreation and Conservation Authority and National Parks have an operating agreement with the Mountain Bike Unit, who provide volunteer patrols, monitoring, and public education and outreach on trails in those jurisdictions. Since this is a State Park operated by the County, we'd like the County to consider a similar volunteer patrol as a way to provide additional safety and monitoring for park visitors. We feel that having uniformed patrollers on bicycles will help quell other trail users fears and help reduce "perceived" conflicts.

After the apparent success of the inadvertent four-year "experiment" which allowed bicycles on the Canyon Trail, and this report's findings and recommendation, we urge the County to move forward on the safety enhancements, and allow bicycles to return to the Canyon trail as soon as possible. If you need further clarification, please do not hesitate to contact us.

Sincerely,

Steve Messer
Vice President, CORBA
steve@corbamt.com

1. Examples of Passive Vs. Active Recreation definitions adopted by County governments:

http://jeffco.us/openspace/openspace_T56_R105.htm

<http://docs.durangogov.org/sirepub/cache/2/iimvuv2tgelcko45bs50m52r/295805807152012072343914.PDF>

<http://www.sccgov.org/sites/parks/Future%20Plans%20Here/Documents/346915strategicplanfinal.pdf>

About CORBA: The Concerned Off-Road Bicyclists Association (CORBA) is an all-volunteer 501(c)(3) nonprofit, and a chapter of the International Mountain Bicyclists Association (IMBA). Formed in 1987, CORBA works with land managers and the off-road cycling community at large to foster off-road cycling as a healthy, sustainable outdoor recreation in Los Angeles and Ventura Counties. CORBA is dedicated to preserving open space, maintaining public access to public lands, and creating more trail opportunities for all to enjoy. CORBA works with California State Parks, National Park Service, National Forest Service, Mountains Recreation Conservation Authority, Conejo Open Space Agency, as well as other local City and County government agencies. Our Volunteer Trail Crew, Youth Adventures, Free Skills Clinics, CORBA Kids Club and other programs promote off-road cycling recreation, and the responsible use and stewardship of our trails and open spaces.