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June 29, 2015

National Park Service  
570 W. Avenue 26, #175  
Los Angeles, CA 90065

Re: Rim of the Valley Corridor Special Resource Study

Dear Ms. Dove,

On behalf of the members and constituents of the Concerned Off-Road Bicyclists Association (CORBA), I thank you for the opportunity to provide comments on the Draft Special Resource Study and Environmental Assessment (the Study) for the Rim of the Valley Corridor. My name is Steve Messer, currently serving as Board Member and President of CORBA. We are a local chapter of the International Mountain Bicycling Association, covering Los Angeles and Eastern Ventura Counties. Our mission statement includes the ROTV corridor as the definition of our territory.

We represent off-road cyclists, and advocate for shared-use trails on public lands, protection and preservation of the public lands upon which our recreation depends, and bicycle-specific facilities such as Bicycle Skills Parks. Our members and constituents actively recreate on trails throughout the study area (with the exception of the City of Los Angeles - see below). We have ongoing relationships with land managers throughout the study area, including the Santa Monica Mountains National Recreation Area (SMMNRA), California State Parks, Los Angeles County, Conejo Rec and Parks District, Mountains Recreation & Conservation Authority, Mountains Restoration Trust, Ventura County, as well as several cities within the corridor.

Our programs include volunteer trail maintenance on trails managed by the aforementioned agencies; Youth Adventures, a program where Mountain Bike Unit volunteers take at-risk youth on interpretive mountain bike rides in the SMMNRA. We are also actively engaged in education of

mountain bikers and other trail users on etiquette. Finally, advocacy. We have been engaged in the ROTV study process since CORBA's inception and are excited to review the draft Study.

The draft findings of nationally significant resources within the study area are as we expected, and we fully support those findings. The importance of the resources for recreation, habitat connectivity, biodiversity, research, education and public health, cannot be overstated. We therefore support the conclusion that these resources deserve the additional support and opportunities for collaborative partnerships afforded by their inclusion in an expanded SMMNRA.

We are pleased to see the Angeles National Forest (ANF) and San Gabriel Mountains National Monument (SGMNM) excluded from the NRA in all four alternatives. We feel that with the new attention the SGMNM is bringing to the ANF, and the existing Service First authority as enacted in 2011, already allow sufficient collaboration between the NPS and USFS when applicable and appropriate.

Since the boundary adjustment recommended in Alternatives C and D include several existing landfills, we would prefer to see the boundaries adjusted to exclude existing landfills within the study area. The Study describes the permitting process that would be required for landfills within the boundary according to 36 CFR, Chapter 1, Part 6. Removing existing landfills from an expanded SMMNRA would reduce paperwork burdens on the NPS. We feel that everything possible needs to be done to minimize additional burdens on the NPS.

One of the volunteer programs of which we are very proud is the Mountain Bike Unit (MBU). The MBU began as a CORBA program, but eventually grew to where it is now coordinated by NPS, California State Parks and the Mountains, Recreation and Conservation Authority. We see the boundary adjustments of Alternatives C and D as an opportunity to extend the geographic reach and community benefit that the MBU program brings to trails and open spaces. We support the inclusion of additional partner agencies within the MBU program.

Rim of the Valley Trail: We fully support the completion of the Rim of the Valley trail as conceptualized: a multiple-use, long-distance trail system for non-motorized trail users including hikers, equestrians and bicycles. Multiple-use trails maximize recreation opportunities for the broadest spectrum of trail users. Further, cyclists are known to travel longer distances per outing than other trail users and would be more likely than other trail users to utilize the long-distance routes a completed ROTV trail network would provide. Additionally, we see the ROTV Trail network as an opportunity to provide connectivity to trail networks throughout the region, an important expansion of recreational opportunities.

The boundary adjustments in Alternatives C and D would provide the greatest opportunity for the NRA to help coordinate the completion of the proposed ROTV trail with the many land managers

in the trail corridor. As a facilitator for partnerships and coordination between disparate agencies and land managers, we feel the NPS could help accelerate the completion of the trail.

One of our greatest concerns with the ROTV trail is the City of Los Angeles' long-standing blanket ordinance prohibiting bicycle use on City trails. Since one of the largest segments of the proposed trail includes City-managed lands including Griffith Park, we would encourage the NRA to help negotiate a continuous multiple-use trail alignment for the ROTV Trail with the City. All of the City of Los Angeles' neighboring jurisdictions have policies favoring multiple-use trails over single- or dual-use trails.

We fully support the role the NPS could play under alternatives C and D in the completion of the Class I bikeway along the Los Angeles River. The inclusion of the Los Angeles River Corridor and its major tributaries is important both for the recreational opportunities, alternative transportation opportunities (bikeways and trails), as well as water quality and aquatic biodiversity and connectivity. With plans currently being developed to revitalize portions of the Los Angeles River and Arroyo Seco, their inclusion within the SMMNRA adjusted boundary will allow the NPS to play an important role in achieving the long-term goals of those revitalization projects.

The SMMNRA is currently in the process of developing an interagency trail management plan (TMP). That process has taken more than a decade and is still years away from completion and adoption. While it remains unlikely that Congress will introduce legislation authorizing boundary adjustments outlined in, or based upon, Alternatives C and D, if it were to do so, we are concerned that this might force a delay in the completion and adoption of that trail master plan. We would like to have clarification that the SMMNRA trail master plan now in development, and within the current planning area, would be completed before any such effort was expended outside the current TMP area. We are encouraged that the study acknowledges the existing trail and master plans currently in place within the study area.

On page 18, the study refers to the County of Los Angeles Santa Susana Mountains Trail Master Plan as "underway." That plan is now completed and has been adopted as a component of the County General Plan.

The overlapping San Gabriel Watershed and Mountains Special Resource Study is now somewhat outdated with the proclamation of the San Gabriel Mountains National Monument. We are not sure how best to reconcile the findings of that study, given the change in status of much of that study area as a National Monument. The goals of the ROTV Study and the San Gabriel Watershed Study are so similar that any congressional action adjusting authorized boundaries for the SMMNRA should also consider the findings of the San Gabriel Watershed study. Whether the study area outside of the ANF/SGMNM is declared as a separate San Gabriel Unit of the SMMNRA, or included in the boundary adjustment of the SMMNRA, we feel that the

bio-connectivity, ecosystem restoration, trail and recreational resource connectivity and alternative transportation connectivity all warrant due consideration, exactly for the stated goals of preserving and improving the resource.

However, one of our biggest concerns with Alternatives C and D are the added burdens the expanded boundaries will place on the NPS. These burdens include both financial constraints, personnel and staffing levels, and the sheer geographic size of the resulting NPS unit. We understand that the boundary adjustment does not change ownership or management authority of any existing public or private land within the boundary, nor does it obligate existing land managers within the corridor to enter into any agreement or partnership with the NPS. It is what is referred to as an opt-in agreement. We fully support this arrangement, which places no unwanted burden on existing land managers within the Study area.

We understand that Alternative B only authorizes technical assistance to existing land managers, whereas Alternatives C/D, with a boundary adjustment, authorize both assistance and capital expenditure within the adjusted boundary. For this reason we agree with the Study finding that Alternative B is not the most effective alternative for achieving the stated goals and outcomes of the Study.

CORBA fully supports Alternative D, with a modified boundary adjustment to exclude landfills as previously mentioned. We see the benefits of Alternative D's expanded range and the addition of Cooperative Conservation Areas providing habitat connectivity to the Los Padres and Angeles National Forests, and support the larger and more cohesive approach it provides. We would also support an expansion to include the areas outside of the ANF for a San Gabriel Unit of the SMMNRA, in keeping with the findings of the San Gabriel Watershed study.

Our concern is that these larger boundary expansions will place excessive financial and staffing burdens on the NPS, and that the quality of service provided by the NPS may be degraded as a result. We also support an additional San Gabriel unit if additional funding, commensurate with the larger boundary and expanded geographic scope, is also secured.

I am available to discuss these comments at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Messer', with a long horizontal flourish extending to the right.

Steve Messer  
President  
Concerned Off-Road Bicyclists Association.