

13th April 2015

To: Melanie Beretti, Program Manager, Monterey County Resource Management Agency

Dear Melanie,

Please find below some general comments on the January 2015 FORHA-TMP stemming from my dual perspectives:

- As one of the proponents of the Fort Ord Rec Trail and Greenway (FORTAG), and
- As an active user and mapper of trails on the former Fort Ord since 1998, which reflect my position as a mountain biker, birder, runner, hiker, dog-walker, parent, road biker, one-time and sometime equestrian, occasional assister of the mobility impaired, occasional plein air painter, conservationist, resident of Fort Ord, and tenured faculty member in environmental science at CSUMB.

Note: In any reproduction of these comments, it would be **essential to reproduce the maps in color**.

I remain very grateful to have an active channel of communication with you and the other county and consultant staff with respect to trail and open-space planning for the former Fort Ord. I'm also grateful for the supporting documents and data files that have been provided to me in response to my requests.

Sincerely,

Fred Watson, Ph.D.

Comments:

1. FORTAG's comments on the draft FORHA TMP are occurring at several junctures:
 - 1.1. Written comments provided to county staff on 5 Feb 2015
 - 1.2. Verbal comments provided to county staff at the public meeting on 18 Mar 2015
 - 1.3. General, preliminary written comments provided to county staff on 3 April 2015
 - 1.4. More-detailed, more-final written comments to be provided to county on 13 April 2015
2. Preamble relating to FORTAG
 - 2.1. FORTAG is arguably the most substantial regional trail planning effort in play on Fort Ord (<http://www.fortag.org>).
 - 2.2. FORTAG is proposed as approximately 30 miles of paved multi-use trail surrounded by open-space, running primarily through the former Fort Ord, encircling Marina, Seaside, Sand City, and parts of Del Rey Oaks, and incorporating parts of the existing "Coastal Rec Trail". See Appendix for more details.
 - 2.3. FORTAG is included in the Screencheck Public Draft Fort Ord Multi-Species Habitat Conservation Plan (HCP) (March 2015).
 - 2.4. The FORTAG concept as including a circumnavigation of Marina is formally supported by the City of Marina (20 Nov 2014), the Sphere of Influence of which encompasses land addressed by the draft FORHA-TMP.
 - 2.5. FORTAG was included in the introduction to the Fort Ord Trails Symposium (Jan 2015)

- 2.6. FORTAG is progressing toward inclusion in the FORHA-TMP; the proposed FORTAG alignment was included in a map presented at the county's public meeting on the draft FORHA-TMP on the 18th of March 2015. (Thank you for this)
- 2.7. FORTAG is being considered in regional transportation planning processes by staff of the Transportation Agency for Monterey County (TAMC).
- 2.8. FORTAG is being considered in former Fort Ord trail master planning processes by staff and officials of FORA.
- 2.9. The FORTAG proposal has been presented to hundreds of stakeholders at approximately 100 meetings with approximately 40 organizations. The proposal has received widespread informal support.

3. In this iteration of my comments on the FORHA-TMP, the following general points are made:

3.1. The FORHA TMP should include FORTAG

- 3.1.1. A textual sub-section (perhaps referring to an appendix) should briefly explain what FORTAG is, based on the FORTAG Vision & Values (see **Appendix A** to these comments)
- 3.1.2. Applicable FORTAG paved trail alignments should appear on the maps in the FORHA TMP, and they should be indicated as a 12-ft paved multi-use trail with 4-ft shoulders.
- 3.1.3. Note that the proposed FORTAG alignments are understood by FORTAG proponents to be subject to change, provided that FORTAG's Values are maintained (see Appendix A). For example, the FORTAG concept is intended to be independent and flexible with respect to the outcome of as-yet uncertain development processes, such as Eastside Parkway, Monterey Downs, Monterey Horse Park, East Garrison II/South, Seaside East, etc.

3.2. The FORHA TMP should indicate that additional FORHA land will need to be placed into conservation easement (CE) as follows.

- 3.2.1. New conservation easements in non-HMAs will be required to mitigate the impacts of FORTAG on county HMAs under the draft base-wide Habitat Conservation Plan (HCP) for the former Fort Ord, above and beyond the HMAs that I understand are designated in the March 2015 Screencheck Public Draft HCP.
- 3.2.2. New conservation easements will be required to mitigate the impacts of non-FORTAG trails not yet fully accounted for in the current FORHA draft because either:
 - 3.2.2.1. The impact of currently planned FORHA trails may have been underestimated, e.g. due to under-estimation of trail lengths resulting from the lack of trail sinuosity in the conceptual trail maps produced to date (see Appendix C).
 - 3.2.2.2. The impact of revoking the planned closure (under the draft FORHA-TMP) of certain trails because of underestimation of their recreational value in the current draft TMP.
 - 3.2.2.3. The impact of existing desirable trails that were omitted (i.e. not identified in any way, for inclusion or closure) from the current draft TMP, but that should be included in the TMP.

3.3. The additional land to be placed into conservation easement should be identified as portions of county land (or land soon to be owned by the county) that is currently indicated as being

developable under the HCP (e.g. non-HMA land) but that is now being considered by the county for open-space uses (presumably subject to rezoning by the county and approval by the State Department of Finance). From the conservation perspective, the appropriate portions would be contiguous with land already designated as habitat.

The total area of the open-space, non-HMA land is sufficient to accommodate not only the aforementioned **conservation easements**, but also **trailhead facilities** (including parking, bathrooms, signage etc.), a **pump track** and similar recreational amenities, and **additional trails** (e.g. general unpaved trails, and paved FORTAG connectors as necessary).

Potential locations for new conservation easements are illustrated in the map in Appendix B of my comments. They include:

- 3.3.1. For mitigation of FORTAG's paved-trail impact on mapped maritime chaparral and sand gilia habitat in the "Sandmat Hill" portion of the Landfill area:
 - 3.3.1.1. A portion of parcels E8a.1.1.2 and E8a.1.4 south of Engineer Equipment Road at the far west edge of the county's landfill parcels. This portion has mapped maritime chaparral habitat that is not yet protected.
 - 3.3.1.2. and/or, A portion of parcel E8a.1.2 on the northeast corner of the county's landfill parcels. This area includes patches of mapped maritime chaparral and sand gilia habitat that are not yet protected.
- 3.3.2. For mitigation of both FORTAG's paved-trail impact and additional non-FORTAG trail impacts on a variety of habitat types in the Happy Trails HMAs (East Garrison North, East Garrison South, Travel Camp, Habitat Corridor, Parker Flats, and Oak Oval):
 - 3.3.2.1. Portions of parcel L5.7 south of Intergarrison Road near the Jerry Smith Access Corridor and portions of parcels L23.3.2.2, L23.3.3.1, and L23.3.3.2 in the East Garrison II area south of the easting East Garrison I development.

3.4. **The FORHA-TMP should allow for a greater total length of trails than is currently indicated.** This need arises because of two issues:

- 3.4.1.1. Some of the trails designated for closure in the draft TMP should not be closed. **See trails designated as "Should not be closed" on the map in Appendix B of these comments.**

I identified the "should not be closed" trails based on recent aerial high-resolution, photography, LIDAR terrain data, and my first-hand experience mapping them with pencil in the field on old Army maps since 1998. I rated the existing mountain bike trail quality on a 6-point scale from "Very poor" to "Outstanding" based on a variety of factors such as surface, width, gradient, erosion risk, views and aesthetics, natural beauty, sinuosity, connectivity and looping, consistency, proximity to trailheads, beneficial redundancy against potentially conflicting uses, and provision of more choices near trailheads. I then identified cases where highly rated trails were either proposed for closure or omitted under the proposed FORHA TMP, and suggested that these should not be closed. I also identified cases where very poor trails could be closed with no regrets from mountain bikers (indicated as "Ok to close" in Appendix B); but with the caveat that I have not yet fully fleshed out an equestrian connectivity

perspective on this part of the analysis.

This trail rating process is not yet complete, but it is complete enough (see Appendix B) to show that, in my opinion, a substantial number of the proposed closures are excessive and would degrade the recreational value of the area; and that this would be unnecessary given the opportunity we have to mitigate trail impact with additional conservation easements I open-space non-HMA land.

3.4.2. The calculation of the lengths of retained trails underestimates their lengths by virtue of the conceptual nature of their drawing. Actual trails are more sinuous (longer) than assumed by the conceptual line drawings, and their ends extend all the way to trail intersections rather than stopping short.

See close-up rendering of example trails in Appendix C of these comments.

3.5. **The FORHA TMP should indicate the desire to include paved, Class 1 connections between FORTAG and any potential future formal trailhead in the Travel Camp area**, while minimizing the impact on existing high-value non-paved trails in that area. Ideally, such connectors would follow the extreme periphery of the FORHA lands, so as to avoid crossings between non-paved and paved trails. The connectors could also occur within the East Garrison development area as part of East Garrison's bikeway system, subject to the approval of the developer, as long as they were Class 1 – i.e. safe for 6-year-olds on bikes to connect from a county trailhead in the Travel Camp area to the greater FORTAG paved trail system.
Note: I have not yet had a chance to add Class 1 connections to the maps in the Appendix.

3.6. **The FORHA TMP should conceptually indicate some “highlighted routes” for different user types.** This will help a diverse user base with their overall understanding of the function of specific trail segments with respect to specific uses. The mountain bike community could fairly easily identify a few favorite loops, and doing so would help other users see the importance of the associated trail segments for the overall mountain biking experience on the former Fort Ord. The equestrian community could do the same. All these things could be indicated on a series of maps, which could then inform planning that kept the right trails open, allowed certain trails to be closed with no regrets by anyone, and facilitated less conflict between user types (e.g. horse hooves adversely impacting mountain bike use; or high-speed mountain bikers adversely impacting joggers, children, birders etc.).

3.7. **FORTAG supports the concept foreshadowed in the draft FORHA TMP that all the northern FORHA lands should eventually become a newly designated Fort Ord Regional Park, involving transfer of all northern county lands in the former Fort Ord to MPRPD.** Specifically, FORTAG proponents discussed this idea with the MPRPD Board of Directors on 7 July 2014 and informally to senior RMA staff on 18 April 2014, senior MPRPD staff on 17 April and 30 June 2014, and senior BFS staff on 7 July 2014. Advantages of operating these lands as a Regional Park instead of through the RMA or County Parks include:

- 3.7.1. More geographically balanced provision of benefits to MPRPD taxpayers and voters,
- 3.7.2. Better financing through the existing MPRPD Benefit Assessment,
- 3.7.3. Better access to special programs through the extensive MPRPD's Let's Go Outdoors programs,

- 3.7.4. Better access to general support for interpretation and outreach,
- 3.7.5. Better operating hours (regional parks are typically open longer than county parks)
- 3.7.6. Better consistency with no-entrance-fee policy (county parks tend to charge for entry; regional parks do not)
- 3.7.7. Better consistency with multiple access point policy (because of the need for entrance fees, county parks typically have fewer points of entry than regional parks)
- 3.7.8. Potentially better liability position and therefore, more freedom for users (because no use fees are charged, regional parks is generally understood to be less liable than county parks, and consequently can be less restrictive on allowed uses and hours).

3.8. **The FORHA TMP process should consider the draft HCP as a document that can still be modified to better serve the needs of FORHA users, with mitigations as appropriate.** The HCP has not yet entered public review; it is not final. The FORHA TMP and the HCP are being developed at the same time, and the draft content of one document should not absolutely dictate or constrain the content of the other. For example, the draft TMP should not assume that the HCP precludes formalization of the existing staging area in the general vicinity of the Jerry Smith Trailhead. The draft TMP could include such a staging area, presumably conditional on appropriate mitigation (e.g. additional non-HMA open-space land put into conservation easement, as noted earlier in these comments).

3.9. **The FORHA TMP should be clear that construction of new trails along new alignments is not excluded by the plan,** and that new trails could be considered within an overall framework of minimizing net increase in trail density above some threshold. Page vi of the draft TMP tends to imply otherwise. New, better trails could be constructed as old, inferior ones are retired. This has been done very successfully on the Fort Ord National Monument (FONM) in several instances, in close collaboration with the Monterey Off-Road Cycling Association (MORCA), among others. Replacing old trails with new ones can be beneficial to both recreational and conservation purposes. Many of the poor trails are in open sandy areas that tend to be more environmentally sensitive, because of increased density of Monterey spineflower, sand gilia, and sandmat manzanita, for example, as well as California Tiger Salamander (near vernal pools and grounds squirrel burrows), and more erodible due to the underlying geomorphic history of dune formation, lower organic content in the soil, and fewer structural roots. As we have learned from the FONM experience, moving some trails closer to oak woodland can lead to enhanced recreational experience resulting from more sinuous, narrow, and durable trails, and reduced biological impact due to reduced overlap with sensitive species and narrower trail area.

3.10. **The FORHA-TMP language should be inclusive of certain kinds of off-trail use being encouraged within the FORHA area (including HMAs).** HCP language and ensuing conservation easement language should also reflect this. Such purposes include, low impact activities such as:

- 3.10.1. Birding
- 3.10.2. Identifying animal tracks
- 3.10.3. Plein air painting
- 3.10.4. Naturalist programs

3.10.5. Environmental education and research

- 3.11. **The FORHA-TMP should include conventional wheelchair users on paved trails in lists of user types** (and should also not exclude off-pavement (i.e. fat-tire) wheelchairs).
- 3.12. **When discussing habitat management and restoration, the FORHA TMP should not portray HMAs as being managed solely for habitat purposes** (e.g. Page vi). Phrases should be appended such as "...in concert with other uses allowed under the HCP."
- 3.13. **FORHA planning documents should include a timeline with details of events to date**, including dates of release of documents for public comment, dates of public meetings, deadlines for public comment, a summary of attendance at meetings, and a description of methods and extent of informing the public about each step in the process. Some of this has been partially opaque in the past, and there is room for improvement. It was great that a notice was posted at the Jerry Smith Trailhead in advance of the March 18th meeting; but it was unfortunate that the notice was not visible because of inadequate signage technique. Improvements in these areas will ensure continued public collaboration, especially if trail closures become imminent.
- 3.14. **Management policy should remain flexible to differing management approaches between FORAH lands and BLM land.** The FORHA goal of providing "policy consistency" with BLM land perhaps suggests otherwise, or at least is ambiguous and should be clarified. Overall, recreation and habitat management on the former Fort Ord should adopt the theory of Ecological Networks, which comprise core areas, buffer areas, corridor areas, and developed areas. In this context, we could view FONM as a "core area" and much of the FORHA land as "buffer" and "corridor" areas. A useful analog exists within the federal land management system of National Parks and designated Wildernesses (core areas) and the often adjacent (non-Wilderness) National Forests (buffer and corridor areas), surround in turn by agricultural, rangeland, and urban land uses. National Forests are the "land of many uses"; and FORHA should be positioned similarly.

Although consistent management policy between FORHA and BLM land might make it easier for managers to achieve accurate messaging to users, this mere convenience should not be a reason to homogenize management policy. Instead, accurate user outreach should be achieved through better signage i.e. clear lists of things you can and can't do on each type of land, and clear indication of the where the management boundaries area. Land transfers may also help i.e. so that management boundaries occur on larger roads, and not in the middle of un-tracked oak woodland.

FORHA lands should, in general, be "lands of many uses". Ways in which FORHA lands might beneficially adopt different management policies to BLM land could include:

- 3.14.1. Provision for certain kinds of off-trail use
- 3.14.2. Higher trail density (appropriate, given closer proximity to dense residential areas desiring a range of options for frequent short trips)
- 3.14.3. Provision for night-time use under certain conditions
- 3.14.4. Different dog rules

Appendix A

FORTAG Vision & Values – taken from FORTAG web site 13th April 2015 (www.fortag.org)

Vision

The Fort Ord Rec Trail and Greenway (FORTAG) is proposed as a continuous 12-ft wide paved bikeway with an open-space buffer on both sides incorporating habitat, parks, playing fields, developed outdoor recreation sites, associated amenities, unpaved trails, and agriculture. The open-space buffer should extend at least 150-ft on each side of the trail for the majority of its length. The northern loop of FORTAG encircles Marina, following a 13 mile route that includes 3 miles of the existing “Coastal Rec Trail”. The southern loop of FORTAG encircles Seaside and bisects Del Rey Oaks, following a 15 mile route that includes 4 miles of the existing coastal trail system. The Trail includes spurs connecting with existing bike/pedestrian infrastructure and plans. Several sections of the paved trail will be accompanied by nearby unpaved trails running loosely parallel to the main paved trail. Many of these unpaved trails already exist.

FORTAG’s intended purposes include: connecting people to open-space from their homes, workplaces, and hospitality bases; connecting together core habitat areas; facilitating social interaction between Fort Ord, Monterey Peninsula, and the Salinas Valley; and acting as an artery from which to launch numerous other recreational activities. The paved trail is intended to be a pleasant and visually obvious route that invites safe use by families with young children on bikes, and that can be jointly used by walkers, joggers, children in strollers, wheelchairs (in key segments), commuter cyclists, and recreational cyclists (including those with narrow tires). Substantial portions of the greenway are intended to support unpaved paths used by hikers, mountain bikers, equestrians, and naturalists. FORTAG will involve approximately three underpasses and one overpass for pedestrians and bikes.

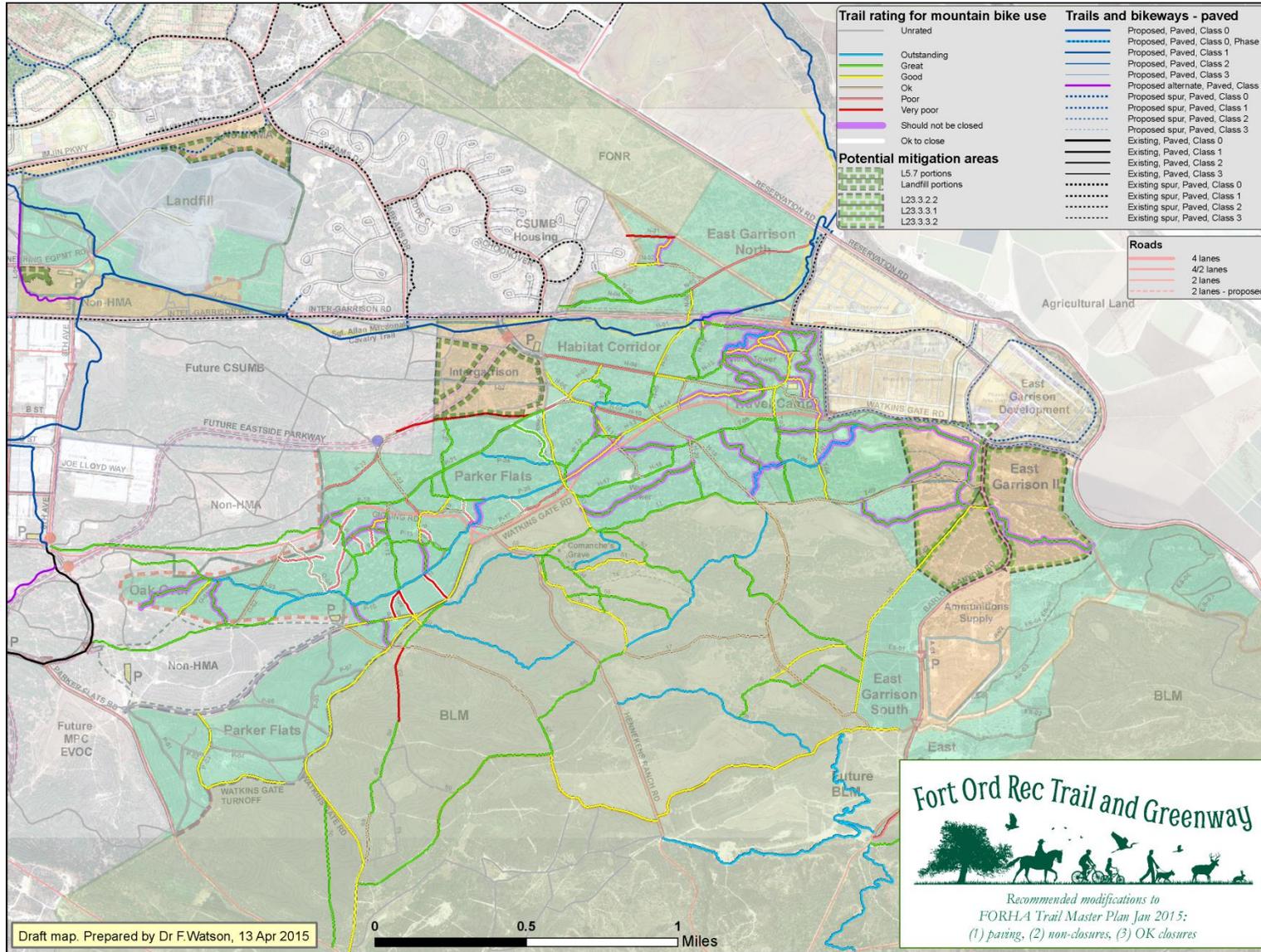
The FORTAG vision as conceived today began in early 2013.

Values

FORTAG should:

- Connect people to open space
- Be a pleasant experience
- Be useable by anyone
- Have room for everyone
- Be complimentary to the built environment
- Have loops, of different sizes
- Be 100% connected all the way around each loop
- Have no 'red flags' from land owners and/or jurisdiction

Appendix B – Map illustrating recommended modifications to FORHA plan (high-res version at fortag.org)



Appendix C – Close-up view to illustrate under-estimation of trail length that results from coarse

