



**San Diego
Mountain Biking
Association**

Maryanne Vancio
California Recreational Trails Committee Member
PO Box 942896
Sacramento, CA 94296-0001
Maryanne.Vancio@sdcounty.ca.gov

Dear Maryanne:

Cal State Parks requested public input for a planned Program EIR addressing the issue of change-in-use designation for trails within Cal State Park. I attended the recent teleconference of California Recreational Trails Committee (I believe) where I met you. As a follow-up to that, I would like to provide you with the following comments, after discussing the letter with fellow SDMBA members.

Most of the comments from the public that I heard during the teleconference concerned user-group conflicts. Although user-group conflicts may be important to individuals, such conflicts are beyond the scope of review required by CEQA.

Just to review, an EIR, required by the California Environmental Quality Act in the event of discretionary government action impacting the environment, is intended to provide disclosure of the impact of the proposed government action on the physical environment. Therefore the Program EIR should only address changes to the physical environment.

User-group conflicts are social issues regarding the social environment. CEQA and its case law is pretty clear in excluding social analysis from the scope of the EIR. Possible arguments between two "user groups" such as a horseback rider and a hiker, or a collision between a mountain bicyclist and a hiker, has virtually no effect on the physical environment. Endangered species in the area aren't killed and their habitat is not destroyed, erosion on the trail isn't increased, and nearby hypothetical archeological sites are not impacted. Therefore a Program EIR is not the place to analyze user-group conflicts.

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Similarly, a Program EIR is not the place to argue for greater access for certain user groups to state park trails.

Focusing then on just the environmental impacts, I would like to make the following points. First, at least one element of the analysis should focus on the per capita impact on the trail. That is, if a trail is opened to a new user group, would an individual from that new user group using the trail produce a greater impact on the trail than an individual user from a different, already-allowed, user group?

Second, suggesting that opening a new trail would have an adverse environmental impact because of increased overall use in terms of user numbers paints an incomplete picture. Consideration should also be given to the possibility that opening a trail in one area would reduce environmental impacts, by reducing use, in a different section. I also suggest that this reducing impact should be extended to related areas in the proximity of the park in question, such as National Forests. Furthermore, it is expected that the usage of the trails will increase with time due to the increase in population of the state, so this should also be factored into the Program EIR.

Since the Program EIR will be directed at the physical environment, this suggests that the Trail Usage Summary, or at least parts thereof, probably still provides a useful mechanism for addressing the social issues of change-in-use designations.

Finally, as always, SDMBA members, and mountain bikers in general, prefer narrow trails. Therefore, if the environmental impact can be mitigated by narrowing trails and improving their sustainability that are undergoing a change-in-use designation, or other trails within the park, that produces better trails from our point of view.

Yours truly,

Russ Boggs

SDMBA Board Member

Russ@SDMBA.com

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