



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

November 10, 2022

Brigitte Shearer, Director
Department of Parks and Recreation
2 Twin Pines Lane
Belmont, CA 94002
Via email to: info@belmontprosplan.com
Cc: bshearer@belmont.gov

RE: Comments on Belmont PROS Plan Final Draft dated 06-28-2022

Dear Director Shearer,

Sierra Club appreciates the opportunity to comment on the Belmont PROS Plan Final Draft dated June 28, 2022 and associated Open Space Management Plan. Our comments address those sections of the documents concerning Open Space policies.

California is world renowned for its biological diversity and its unique plant and animal species. Approximately 40 of the state's 770 native wildlife species and about 2,100 of its 6,300 plant species are found nowhere else. Our region is one of the world's 25 biological hot spots, places of greatest biodiversity and greatest threat ¹. Belmont's new PROS Open Space Master Plan offers an opportunity for Belmont to contribute to Federal, State and local goals to conserve these valuable biodiversity hotspots.

Sierra Club endorses the comments of the WaterdogPreserve.org letter "*Requirements for Belmont's Open Space Master Plan*" dated October 26, 2022 (attached with this letter). In particular Sierra Club stresses the following:

1. Conform to Belmont's 2035 General Plan Open Space Conservation Priorities.

Belmont's General Plan Goal 4.4 establishes a balance of considerations "including natural resource conservation, outdoor recreation and public health and safety." To be sustainable, recreation must not have a negative impact on the environment or wildlife. The Draft PROS plan discusses the importance of riparian habitat, invasive species, special status and endangered species, and the wildlife connectivity corridor, but it lacks specific policy mechanisms to ensure protections are implemented. Please include a project planning and approval mechanism to ensure conservation of habitat and wildlife are given equal priority with recreation, per General Plan policy. Such mechanisms might take the form of a mandatory project approval protocol, and decision tree or findings and conditions to be met before approval of any policy, project or action.

¹ https://www.parks.ca.gov/?page_id=22197

2. Include Safe Trail Use Policies

The Draft's recommendation of multi-use of all trails for mountain biking conflicts with General Plan passive-use and safety priorities. The incompatible use of biking and passive activities on narrow or steep trails creates a dangerous condition about which the City has received multiple notifications and injury reports that would be considered under section 835.2 of the civil code.

The attached [Sierra Club Policy Document](#) addresses off-road bicycle use, outlining criteria, mitigations, monitoring and enforcement needed for bike trails. Sierra Club concludes that bicycle use *should not be allowed where it would cause danger to the safety of bicyclists or other users* because of bicycle speed, steep grades, steep terrain, sharp curves, slippery or unstable trail surfaces, or limited visibility. Commonly accepted trail design standards call for wider trails and lower grades for bike use; trails not meeting these standards should be reserved for hiking only. Even a perception of unsafe conditions displaces a large segment of the public, and the intrusion of active sporting activities will displace those who visit for the General Plan prescribed *passive activities*. The PROS Plan should include explicit policies to prioritize passive recreation, per General Plan policy, and to provide safe trails for users of all abilities.

3. Protect wildlife and their habitat

While the Draft describes species of concern and critical habitats in the Open Space, it lacks policies to *enact* protections. In conformance with the General Plan requirement of balancing conservation with recreation, maintenance of the wildlife corridor, riparian habitats, and complete functional habitats should be integral to all decision making. Site-specific environmental assessment and protocol-level study of species should be required as part of the previously discussed project approval protocol. Projects that improve habitat and reduce species impacts should be prioritized, and projects that are not fully mitigated should be rejected.

4. Plan for Climate Change

The parks master plan should plan for a future that is dryer, hotter, more fire prone, but also more likely to experience an extreme rain event. Concrete culverts should be converted to berms and retention areas to hold and absorb water for surrounding vegetation. Trails near creeks and culverts should be closed or realigned to allow wildlife free access to an increasingly limited yet essential water source. Alternate accommodation should be provided on nearby streets using the [slow streets](#) movement. Avoid excessive clearcutting of native chaparral and chamise in the name of wildfire safety; native shrub communities provide vital habitat, reduce surrounding ambient temperatures, and stabilize soils, and the invasive grasses that prosper after chaparral removal are more flammable than the woodier vegetation. Implement a reforestation program to replace S.O.D. loss and replace the tree canopy vital to the survival of the forest understory.

5. Adopt Best Practices of Open Space Management

The expertise of other open space management agencies should serve to inform open space policies; learn from the best. Environmental protections, trail use criteria, trail alignment,

construction standards, maintenance and habitat protections should adhere to best practices of leading State or County agencies to prevent environmental impacts and ensure long-term sustainability. The management manual of an appropriate state or county agencies could be adopted to guide routine management actions and maintenance procedures.

The PROS plan should implement protocol requiring environmental review for any project or policy. Baseline use rates and anticipated impacts from increased recreation or visitor volume should be quantified *prior* to approval of any policy or project. Mitigations (including the alternative of “no project”) should be required as a condition of approval for any policy or project.

6. Fund Maintenance

Per Belmont’s 2035 General Plan Parks and Recreation Open Space Element please provide a mechanism to ensure sufficient funding to maintain safe trails and restore habitat damaged by recreation. Unsafe trails, or those causing damage, should be closed until there is adequate long-term funding to restore the balance of healthy habitat and safe recreational use. Explicit priorities should require funding to maintain existing trails and amenities *before* adding new.

Sierra Club strongly urges a complete Environmental Impact Report prior to setting Open Space management and trail-use policies, and thus prior to adopting this PROS Plan. The PROS Plan is entirely discretionary, and changes trail-use policies which have potential to increase intensity of use, and thus cause direct and indirect impacts to the environment. The policies implemented by the PROS plan add cumulative impacts to the original trail system which itself never underwent required environmental review upon construction in 1998 nor upon expansion in 2009. The Plan thus meets the CEQA definition of a Project that requires CEQA conformance prior to adoption.

Thank you for your consideration.

Respectfully Yours,



Gladwyn d'Souza
Conservation Committee Chair
Sierra Club Loma Prieta Chapter

Cc: James Eggers
Executive Director
Sierra Club Loma Prieta Chapter