TO: Montgomery County Planning Board

VIA: Jeff Zyontz, Chief, Countywide Planning Division

FROM: Lyn Coleman, Trail Planning Supervisor
       John Hench, Supervisor, PPRA Unit

SUBJECT: WORKSESSION ON PUBLIC HEARING DRAFT COUNTYWIDE PARK TRAILS AMENDMENT: THE TRAIL CORRIDOR PLANNING PROCESS: APPROVAL WITH CHANGES (No public testimony will be heard)

RECOMMENDED PLANNING BOARD ACTIONS:

Affirm Countywide Park Trails Plan guiding principle "to seek balance among recreation, transportation, and environmental concerns" on a countywide basis.

Approve Public Hearing Draft Plan with the following changes:

- Add as objective of the Natural Surface Trail Planning process "to create sustainable trails that support current and anticipated appropriate trail uses with minimal impact to the adjoining natural systems and cultural resources" (definition from National Park Service).
- Endorse the recommended initiatives proposed in the packet to achieve sustainable trails.
- Clarify the steps in the natural surface trail planning and implementation process.
- Add "primitive trails" as natural surface trail category.

PROPOSED AGENDA:

1. Planning Context: Overview of Countywide Park Trails Plan (PowerPoint presentation)
2. Proposed Trail Corridor Planning Process
3. Summary of Public Hearing Testimony
4. Survey of Planning and Implementation Approaches to Natural Surface Trails
5. Staff Recommended Board Actions (see Figure 1)
   a. Concept of Balance (p.7)
   b. Natural Surface Trail Planning and Implementation (p.8)
   c. Natural Surface Trail Categories (p.12)
SUMMARY OF RECOMMENDED PLANNING BOARD ACTIONS

**Affirm** Countywide Park Trails Plan guiding principle “to seek balance among recreation, transportation, and environmental concerns” on a county-wide basis.

**Approve** Public Hearing Draft Plan with following changes:

Add on page 30, the following objective to help guide the natural surface trail planning process:

“To create sustainable trails that support current and anticipated appropriate trail uses with minimal impact to the adjoining natural systems and cultural resources”

**Endorse** initiatives in the Public Hearing Draft Amendment that support the sustainable trails, including the importance of hiring a Trails Volunteer Coordinator and the need to explore the possibility of creating a Trail Work crew in each of the park regions (north and south).

**Amend** Figure 8, the natural Surface Trails Planning Process to clarify the planning and implementation process and to incorporate the following proposals related to sustainable trails initiatives proposed in the packet:

- Preparation of a Trail Assessment Study prior to a trail being included in the Trail Work Program for completion.
- Preparation of a Trail Implementation Report to guide management and monitoring of the trail over time.

Add “primitive trails” as a natural surface trail category.
6. Discussion of Key Points of Public Hearing testimony
   a. Stream Valley Parks and Conservation Parks in Trail Planning
   b. How Natural Surface Trail Category is Determined
   c. Interpretation of Park Surveys
   d. Specific comments on text

AGENDA TOPICS:

1. PLANNING CONTEXT
   This will be a PowerPoint presentation.

2. PROPOSED OVERVIEW OF TRAIL CORRIDOR PLANNING PROCESS

   The purpose of the proposed Trail Corridor Planning process, shown as Figure 2, is to establish a predictable, orderly approach to planning trails within the eight trail corridors identified in the Countywide Park Trails Plan. Many people testified expressing different viewpoints on which trail planning factors should receive the greatest weight. Some people, for example, felt the presence of one or more environmental features should negate trails altogether.

   The proposed Trail Corridor Planning process does not pre-judge the outcome of a trail plan but identifies what planning factors should be considered, identifies the role of the Planning Board and outlines a public participation process.

   Some people who testified expressed concern that the process is so long and so convoluted that the trails program will be slowed down.

   The Trail Corridor Planning Process applies to trail planning at a very broad level. The Northwest Branch Trail Corridor, for example, is 25 miles in length. Once the Trail Corridor Plan is approved by the Planning Board, trail projects within the corridor can be implemented more quickly because key trail decisions have already been made: type of surface, generalized location (for example, which side of a stream), potential locations for trail heads and community connectors.

   As discussed in more detail in the natural surface trail section, a Trail Corridor Plan may not be necessary prior to designing shorter, natural surface trails. A community, for example, may request a natural surface trail be created in parkland adjoining their neighborhood or perhaps the opportunity exists to link existing trails into a longer network. In these instances, a more streamlined and efficient approach to natural surface trail planning should be possible. This type of approach is discussed in the Natural Surface Trail section.

3. SUMMARY OF PUBLIC HEARING TESTIMONY and STAFF RESPONSES
   The Summary begins on circle page.
# TRAIL CORRIDOR PLANNING PROCESS

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<td>Staff proposes a Trail Corridor Plan be added to the Trails Work Program</td>
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<td>Purpose and Outreach Strategy Report</td>
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<td>Staff prepares Staff Draft Trail Corridor Plan</td>
<td>Staff Draft Trail Corridor Plan Community Meetings Planning Board reviews Staff Draft, makes changes, approves publication as Public Hearing Draft Plan</td>
<td>Relation to Countywide Park Trail Plan Document need Evaluate trail opportunities and constraints based upon following information: a. Mapping of sensitive areas as defined by the Environmental Guidelines and Trees Technical Manual b. Identification of historic and archaeological features and settings c. Potential for connection to adjacent communities, and other trail systems and bikeways d. Identification of disturbed areas within corridor e. Identification of generalized areas where bridge crossings are needed. f. Analysis of grades and slopes to examine potential for accessibility to people with disabilities Balance recreational, environmental, and transportation objectives Identify recommended trail alignments for purposes of further community input Recommend amendments to Countywide Park Trails Plan Include Trail Assessment Study that identifies trail use categories (shared use, hiking only) for natural surface trails based upon evaluation of following considerations: a. Relationship of trail to sensitive areas (natural, archaeological, historic) b. Proximity to a nature center, stable, or other park facilities c. Proximity to population centers or community amenities such as schools, libraries, rec. centers, etc. d. Safety (sight distance, hazards on trail, steep slopes, etc.) e. Maintenance considerations f. Evaluation of trail use needs in larger geographic area (that is, are there user groups whose trail needs are not being accommodated in the larger geographic area?)</td>
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<td>Planning Board Review and Approval</td>
<td>Public Hearing Draft Trail Corridor Plan Planning Board Public Hearing Planning Board Worksession</td>
<td>Staff prepares written summary of Public Hearing Testimony Staff responds in writing to testimony Staff discusses recommended changes to Draft Plan based on analysis of testimony.</td>
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4. SURVEY OF PLANNING AND IMPLEMENTATION APPROACHES TO NATURAL SURFACE TRAILS

At the Public Hearing, the Planning Board asked staff to explore how other agencies and planning organizations approach trail planning with particular emphasis on natural surface trails. Staff has reviewed the following publications as background for this work session:

a. National Park Service: "Backcountry Recreation Management"
b. National Center on Accessibility: "Trail Research on Surface Treatments"
e. Designing Sidewalks and Trails for Access, US Department of Transportation, 2001
g. Trail Construction and Maintenance Notebook, United States Forest Service, 2000 Edition
h. "Soil Stabilizers On Universally Accessible Trails", Federal Highway Administration, 2000
l. Trails Design and Management Handbook, Open Space and Trails Program, Pitkin County, Colorado,
m. Trails for the Twenty-First Century: Planning, Design, and Management Manual for Multi-use Trails, Rails-to-Trails Conservancy,

q. Trails Plan 2000, Iowa Department of Transportation, 2000
r. Recreation Trail Management, British Columbia Ministry of Forests

A survey of the literature supports the importance of trail planning prior to construction and the need to relate individual trail projects to a larger trail concept. All studies recognize that trail planning involves balancing recreational and environmental objectives. As an example, the balancing approach used by the British Columbia Ministry of Forests is shown in Figure 3.

Most agencies have found that good trail design is critical to trail success. Low use on a poorly designed trail can result in more damage than heavy use on well-designed trails. Any user group on a poorly designed and built trail can cause damage. The National Park Service trail guidelines state: “the majority of environmental impacts from recreational (natural surface) trails results from inappropriate trail construction and maintenance.”

For natural surface trails, soil erosion is one of the most frequent types of environmental disturbance on trails and is likely to occur on trails where surface runoff in not properly controlled, where trail grades are too steep and where surface water is not diverted off the trail.

Based on the review of the studies listed above, staff is recommending an approach to natural surface trail planning, design and construction that emphasizes “sustainable trails”. This approach is described in the next section.
10.3.1 Principles of Trail Design

Well-designed trails create a harmony between user and location.

While trails may provide access to a destination, they can also provide the trail user with a sense of enjoyment and fulfilment throughout the journey. In many situations, trails are not taken to reach a particular goal; rather it is the joy of using the trail and savouring the trail environment that is the primary recreation experience being provided.
5. STAFF RECOMMENDED PLANNING BOARD ACTIONS

A. The Concept of Balance

Recommended Board Action: Affirm the Countywide Park Trail Plan’s guiding principle to seek balance among recreation, transportation and environmental concerns on a county-wide basis.

The issue of balance was the topic most frequently addressed at the Public Hearing. A sampling of some of the testimony follows: Resource protection should be commanding principle and take precedence over recreation activities. Document takes de facto position our parks are meant mainly for recreational purposes. No concept of leaving ecological areas primitive for preservation of wildlife with recreation minimized. Object to defining stewardship as balance. Trails should be confined to narrow, natural surface trails and paved multi-user trails should be severely restricted or entirely eliminated from park plans. First obligation is to environmental protection. Balance is not achieved by providing every park user with the same trail to use. Should not prohibit planning or building a trail in an environmentally sensitive area without study. Intelligent planning and engineering can solve many concerns about environmentally sensitive areas. Recognize role of hard surface trails in region-wide bicycle transportation system. Balance means equilibrium, not a sacrifice of environment over recreation. What does geographic parity mean? Distressed MNCPPC has built so few natural surface trails over past decade. Provide opportunities for all different types of trail users. Support extension and completion of bike trails; need to rely more on alternatives to the automobile. Concerns about lobby to exclude or minimize recreational use on trails. Recreational trail riding is primary use of horses in Maryland and contributes to economy; equestrians have vested interest in maintaining quality and environmental integrity of our parks. County should be building recreational bike trails like those at Schaeffer Farm. Trails should help people get “from here to there” safely by bicycle. Conservation policy should carry equal weight to policy that designs trail. Bias that walking is acceptable but biking is not. Oppose de facto position our parks re meant mainly for recreational purposes. Tear up the draft and think of connectivity with natural trails. Need shift in culture to accept no development. Balance means conserving natural resources versus enhancement of already developed environments. Balance has no justifiable logic or approaches explained.

Staff Discussion: The following principles guided preparation of the Countywide Park Trails Plan; the Planning Board’s commitment to a balanced approach to trail planning is highlighted in bold:

a. Maintain a Countywide perspective
b. Emphasize connectivity
c. Provide variety
d. Establish guidelines to aid decisions at the local planning level
e. Seek balance among recreation, transportation, and environmental concerns
f. Establish the priority of key components of the Countywide network
g. Designate a network which is responsive to population centers, both existing and planned
h. Recommend implementation strategies.

A planning philosophy that emphasizes balance is not new to the Countywide Park Trails Plan and can be found in planning policy documents that include the General Plan Refinement Goals, Objectives and Strategies and the Montgomery County Park, Recreation and Open Space Master Plan.
The Planning Board’s commitment to balance was most recently confirmed in a letter to the County Council in July 2002. As stated in that letter, “stewardship means finding the right balance between recreation and the protection, preservation and best management of natural and cultural resources in the park; our agency’s mission for the past 75 years (has been to) protect natural resources and provide public enjoyment of our parks. Achieving this balance is the essence of stewardship” and is best achieved on a county-wide basis.

The purpose of this Plan Amendment is to establish a process for achieving balance in a manner that is understandable to the public and allows different people with different trail interests an opportunity to express their viewpoints as trails are planned.

The role of environmental protection is very important in the trail planning process and for this reason completing an environmental inventory is the first step in the trail planning process, whether it be for natural or hard surface trails.

The issue of balance is addressed in the section of the Public Hearing Draft entitled, “Balancing Recreational and Environmental Objectives.” As noted in the Public Hearing Testimony, “transportation” should be added to the title to be consistent with the overall Plan principle to seek balance among recreation, transportation and environmental concerns. Staff concurs with this recommendation.

B. Natural Surface Trail Planning and Implementation

Recommended Board Action: Add as objective of the Natural Surface Trail Planning process “to create sustainable trails that support current and anticipated appropriate trail uses with minimal impact to the adjoining natural systems and cultural resources” (definition from National Park Service). Endorse the initiatives proposed in the Public Hearing Draft Amendment that support sustainable trails. Amend the steps in the natural surface trail planning and implementation process to include preparation of trail assessment study and Trail Implementation Strategy.

Staff Discussion: Much of the Public Hearing testimony focused on how trails can be provided that are friendly to both the environment and the user. This is not an issue that is unique to Montgomery County. A review of the literature related to natural surface trail planning clearly shows this is a goal of most jurisdictions.

A common theme in the natural surface trail studies reviewed by staff (see listing above) is the importance of creating sustainable trails. Sustainable trails:

- Feature good stewardship as evidenced by good quality construction and maintenance and by promoting responsible use on the part of the trail user (British Columbia Ministry of Forests).
- Support current and anticipated appropriate uses with minimal impact to the adjoining natural systems and cultural resources. (National Park Service)
- Enhance the user’s outdoor experience while protecting the property’s environmental health. (Minnesota Department of Natural Resources)
- Are planned with trail management and monitoring in mind (Colorado State Parks)
- Are well-crafted, unobtrusive, environmentally sensitive and lay “lightly on the land” (US Forest Service)
Are sited and designed to be in harmony with surrounding natural and cultural settings and to retain natural appearance and values (Santa Clara County Countywide Trails Master Plan).

Produce negligible soil loss or movement while allowing vegetation to inhabit the area (National Park Service)

Require little rerouting and minimal long-term maintenance. (National Park Service)

Include signage so that the trail route is clear in any season of the year (Colorado State Parks)

To help assure the creation of sustainable natural surface trails in Montgomery County Parks, the following actions have already been taken:

- **Natural surface trail planning and implementation have been consolidated.** Responsibilities for natural surface trail planning and implementation have been consolidated in the same office. This action will have the following benefits: a single work program will be prepared for all natural surface trail projects and priorities will be more easily assigned; the same staff who plan the trail will also supervise construction of the trail; trail building experience and expertise will be collected in one place; park managers and park maintenance will have a single point of contact regarding the natural surface trail work program.

- **Signage will receive greater attention during trail planning and implementation.** Good signage is critical to keeping people on a designated trail. Staff will examine signage in each of the trail corridors to assure trail users know where trails are and what uses are permitted.

The following actions recommended in the Public Hearing Draft Amendment will further strengthen the Sustainable Trail Initiative:

- **A Trails Volunteer Coordinator is an essential part of the sustainable trails program.** As stated over and over again in the Public Hearing testimony, volunteer can help implement the natural surface trail program. This position is currently “frozen” but should be filled as soon as funds are available.

- **The possibility of creating a Trails Work Crew within the Parks Department needs to be explored.** All of the documents reviewed for this work session emphasize the importance of having skilled trail staff monitor and maintain trails. This approach needs to be explored.

The revised Natural Surface Trail Planning and Implementation process (see Figure 4) will assure preliminary trail planning will occur prior to a trail being added to the Trail Work Program. The revised process requires a Trail Implementation Action Report be prepared to guide management of the trail over time. These elements are described below:

- **A Trail Assessment Study will be prepared prior to recommending a trail be added to the Trails Work Program for construction.** Before a natural surface trail construction project is placed in the work program, staff will conduct a Trail Assessment Study to evaluate opportunities and constraints related to a trail, determine trail use type, identify capital projects (such as bridges) that may require new funds, estimate monitoring and maintenance costs and recommend a time-frame for implementing the trail. An outline of a Trail Assessment Study is attached. As shown in Figure 5, a Trail Assessment Study can be completed within
Natural Surface Trails
Planning & Implementation Process

Countywide Park Trails Plan

Trail Corridor Plan

Include Trail Assessment Study as Element of Plan

Recommend Trail be added to the Trails Work Program for construction

Proceed with Trail
Prepare Trail Implementation Action Report

Gives guidance to:
Park Management Plan
Park Master Plan

Prepare Trail Assessment Study for trails not needing master plan preparation
OUTLINE OF PROPOSED TRAIL ASSESSMENT STUDY

(This study can be done as part of a trail corridor plan, a park master plan, or as a stand-alone study for individual trail proposals)

ANALYSIS AND EVALUATION

1. **Identify and Evaluate Environmental Features.**
   Using sensitive buffer maps prepared by PPRA, identify and evaluate environmental features. Verify by field walks with staff naturalists and park managers.

2. **Identify and Evaluate Cultural Resources.**
   Identify with staff archaeologists and historians those resources that should be avoided, and those which could be interpreted.

3. **Identify Existing Areas of Disturbance.**
   Identify areas already disturbed by human activity (for example, former farm fields, old roadbeds, sewer line rights of way).

4. **Evaluate Surrounding Land Use Patterns and Population Densities.**
   Identify character of surrounding neighborhoods and opportunities for community connectivity and opportunities to provide access to community destinations. Consider relationship of trail to existing development.

5. **Identify Opportunities for Trail Accessibility to People with Disabilities or Limited Mobility.**
   Evaluate whether terrain and location of trail heads would provide opportunities to provide accessible trails.

6. **Identify types of trails in area.**
   Evaluate what types of trails are available to what types of users in the area.

7. **Estimate operating budget impacts on park operations.**

STAFF RECOMMENDED TRAIL ALIGNMENT AND TRAIL CATEGORY

1. **Identify alignment and walk with Staff Trails Team. Modify as needed.**

2. **Identify trail category (hiking only, shared use, special focus).**

3. **Identify needed capital improvements (bridges, trail heads, etc).**

4. **Identify maintenance/management program.**
- the context of Trail Corridor Plan, a Park Master Plan or they may be “stand alone” studies prepared in response to community requests or community needs.

- A Trail Implementation Action Report will be prepared to guide management of the trail over time. Once the Planning Board has approved a trail for implementation as part of the Trails Work Program, staff will prepare an implementation report that will include a trail route and trail map, signage plan and maintenance and monitoring plan. This internal staff level document will create a permanent management record for a trail and will be updated on an annual basis as part of a regular trail monitoring program.

C. Natural Surface Trail Categories

Recommended Board Action: Add “primitive trail” as a natural surface trail category.

Staff Discussion: Many people who testified at the Public Hearing expressed concern about having opportunities to enjoy nature and commune with nature in a wilderness-type setting. To allow for that type of experience, staff recommends adding a “primitive trail” category to the types of natural surface trails.

As defined by the speaker who suggested adding this trail type, a primitive trail is a blazed trail that leaves the ground ungraded. This type of trail is challenging and involves minimum trail improvements.

6. Discussion of Key Points of Public Hearing Testimony

A. Role of Stream Valley Parks and Conservation Parks in Hard Surface Trail Planning

The Public Hearing Testimony expressed specific concerns about hard surface trails in two types of parks: stream valley parks, particularly when a park is narrow and features dense tree cover, and conservation parks.

Stream valley parks form the foundation of the park system and are acquired primarily for conservation purposes. They hold the key to watershed protection throughout the County by reducing flooding, sedimentation and erosion and they furnish valuable habitat for many species of wildlife. There are 30 such parks in the County, which include nearly 12,000 acres of parkland.

In terms of hard surface trails, the Countywide Park Trails Plan avoids stream valley parks as much as possible. Sometimes alternatives, like bike paths, are available that parallel the stream valley park. In other instances, additional parkland outside the sensitive areas of the stream valley can be acquired to accommodate the trail. There are cases, however, where a stream valley park offers the only opportunity to provide the type of connectivity proposed in the Countywide Park Trail Plan. In these instances, careful planning and design must occur to minimize and mitigate environmental impacts to the stream valley park.

Other than the Capital Crescent Trail, which is located along a former railroad right of way, most of the County’s hard surface trails are located in stream valley parks: Rock Creek Stream Valley Park Hiker Biker Trail (14 miles) and Sligo Creek Hiker Biker Trail (8 miles) are the two longest. Wheaton Regional Park offers a 3.5 miles paved trails in an upland setting.

The Countywide Park Trails Plan proposes new hard surface trails in the following stream valley areas: in Muddy Branch Stream Valley Park Units II and III, (1.1 miles). This trail is located
primarily in an area once farmed and already cleared and serves a rather dense residential area just south of the City of Gaithersburg. In Rock Creek, a trail is proposed to link an existing trail in Olney to Rock Creek Regional Park. As part of the Rock Creek Master Plan, additional land is proposed for park acquisition to allow the trail to be located outside sensitive areas within the stream valley. In Clarksburg, the proposed greenway hard surface trail follows a cleared WSSC right of way within the stream valley and will be an important recreational facility for the future population center.

Appendix A of the Public Hearing Draft Plan goes into greater detail in terms of how hard surface trails are located when a stream valley park is involved.

Conservation Parks are generally large areas that preserve specific natural, archaeological or historical features, are typically located in upland areas and are acquired specifically for environmental preservation. No conservation parks in the county feature hard surface trails. Pre-existing gravel roads in two conservation Parks, i.e. Hoyles Mill and Blockhouse Point, may offer opportunities for the disabled as well as people on bikes. Final decisions about trails at both these parks will be done in the context of overall plans for each park.

B. How Natural Surface Trail Categories are Determined

The testimony on this topic ranged from those who would like very explicit criteria for determining whether a trail should be hiking only or shared use to those who request all trails be shared use unless there is an overriding environmental concern.

The approach outlined in the Public Hearing Draft is based on the following factors being evaluated in assigning a trail use category to a natural surface trail (see page 27 of Draft):

- Relationship of trail to sensitive features (i.e. streams; stream buffers; 100-year floodplains; steep slopes; wetlands; wetland buffers; highly erodible soils; habitats of rare threatened, endangered, and watchlist species; archaeological resources and historic sites)
- Proximity to a nature center, stable or other special park facilities
- Proximity to population centers, community amenities or schools
- Safety (sight distance, hazards on trail, steep slopes, etc.)
- Maintenance considerations
- Evaluation of trail use needs in larger geographic area (that is, are there user groups whose trail needs are not being accommodated in the larger geographic area?)

In addition, the Public Hearing Draft endorses the conservation policies for off road use of bicycles developed in conjunction with the International Mountain Biking Association (see attached).

Determining the appropriate trail use category will be done as part of the Trails Assessment Study. This process will rely on a combination of general criteria coupled with staff’s best professional judgment.

Some Public Hearing testimony expressed the need or desirability of using detailed criteria by which to judge whether certain user groups are negatively affecting a trail and the surrounding environment. Such criteria might include the effect of use on soil compaction. This would require evaluating soil compaction prior to a trail being opened than monitoring the amount of soil compaction over time, and then determining what user group contributed to it and making a finding that a certain standard had been violated. From all the literature surveyed for this
worksession, the way to create a sustainable trail is to site and build it correctly in the first place.

In our park system, trails are monitored by staff with professional training in natural resource protection, arboriculture, park maintenance and public safety. Solutions to problems may include closing a trail to a particular user group, closing the trail seasonally, rerouting the trail to a better alignment or redesigning a particular section of trail.

C. Interpretation of Park Surveys

The 1997 Park, Recreation and Open Space Survey

As reported in the 1997 Park, Recreation, and Open Space Survey for Montgomery County, park trail activities were by far at the top of the list. An overwhelming 58.6 percent of residents listed walking or hiking as one of their top two activities. When other activities such as bicycle riding (23 percent); running/jogging (11 percent) and horseback riding are added, the results showed a tremendously high participation in activities that may occur on park trails.

Trails also provide important access to natural and cultural resources. Without them, people would not be able to observe nature throughout many of our parks. In the survey, slightly over 75% of the survey respondents reported visiting a County park at least once just to enjoy the outdoors or nature rather than to participate in a sport or use a recreational facility. Trails were used for passive recreation activities such as birdwatching, nature walks, photography, etc. The survey clearly reveals the importance of park trails for public enjoyment of natural and cultural resources as well as recreation. especially recreational activities associated with trails.

The Survey of Residents in the Potomac Area, done as part of the Potomac Master Plan process in 1999, indicates that support for protecting the environment does not necessarily translate into lack of support for trails. As noted in the staff report on the Survey, "respondents gave priority to protecting the environment over building new recreational facilities in parks by 73 percent to 14 percent... At the same time, 60 percent support new trails in parks to connect to the C&O Canal. The majority do not appear to see such trails as detrimental to protecting the environment."

D. Recommended Changes to Text

Staff recommends the following text changes proposed as part of Public Hearing testimony:

p. 8-

Acknowledge that trails can have a positive impact on the environment, including benefits to air quality.

p. 33 –

8. What factors will be considered in determining whether a natural surface trail should be shared use?

p. 33-

Delete reference to "measurable" effects; text already discusses significant effects will be evaluated.

p. 44-
Add as an approach to promoting successful shared use trails:

r. Require that faster-moving trail users utilize bells or similar devices to avoid startling slower-moving trail users.

p. 52-56

Acknowledging that well-planned trails can help control the creation of unplanned trails that are damaging to the environment.