

Mount Diablo State Park Draft Road and Trail Management Plan Response to Comments December 2015

In May 2015 the Department of Parks and Recreation (“Department”) released the Draft Road and Trail Management Plan (“RTMP”) for Mount Diablo State Park (“MDSP”). Public comments on the draft were accepted through June 2015. The Department received over 300 comments from individuals, organizations, and local agencies. Each comment was reviewed and considered for incorporation into the document. Comments in support of or opposed to the plan or elements of the plan were noted but no response will be provided. Those comments with specific questions or concerns are addressed below. Because many of the comments addressed similar issues, a number of standard responses were developed. Those standard responses are listed below and referenced by number at the appropriate comments.

Standard Responses:

1. **Bikes:** In an effort to meet the recreational needs of all members of the public, the Department is obligated to consider those uses requested by the public and to accommodate those requests where it is appropriate to the park’s classification, where preservation of the natural and cultural resources can be maintained, and where public health and safety can be managed. Mount Diablo State Park is classified as a “state park”. Pursuant to the California Public Resources Code, “improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations. Improvements may be undertaken to provide for recreational activities including, but not limited to, camping, picnicking, sightseeing, nature study, hiking, and horseback riding, so long as those improvements involve no major modification of lands, forests, or waters. Improvements that do not directly enhance the public’s enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions in themselves, or which are otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks.” (Public Resources Code Section 5000 et. seq.) The Department strives to balance the recreational needs of the public with preservation of the natural and cultural resources in the park and the health and safety needs of trail users. In addition, the Department strives to implement the goals of the State’s Recreational Trails Plan, which include encouraging the appropriate expansion of multi-use (hike, bike, ride) trails. Thus, the Department developed a “change-in-use” (CIU) process to objectively evaluate if bikes can be added to a trail. The CIU process includes analysis of all potential impacts of a proposed CIU to the safety and sustainability of a trail. If park management does not feel that impacts can be managed through trail design modifications, such as the addition of speed control devices or trail reconstruction/reengineering, or through management options, such as alternate days of use or one way travel, the CIU may not be to be approved. Bikes will not be

allowed where they will cause significant impacts to natural or cultural resources or cause significant health and safety concerns that cannot be addressed through design or management alternatives. During the development of this RTMP CIU requests were received and processed for five trails (Camel Rock, Juniper, Oak Knoll, Secret, and Summit). No new CIU requests will be considered as part of the development of this RTMP. New CIU requests can be submitted through the Department's normal CIU process as described on the Department's website

2. **Signage:** The Road and Trail Management Plan (RTMP) makes several recommendations regarding signage including to improve way-finding and interpretive signage and coordinating directional and interpretive signage with other trail managers in the area. The Department appreciates the importance of adequate safety and rules signage and will work to provide signage as funding allows.
3. **Management Options:** Management options, such as alternating days of use or one-way circulation, are in keeping with the Department's policy regarding trail management and will be considered one a case-by-case basis to improve the safety of trail users. However, management options do not necessarily improve the sustainability of the trail. The Department developed the CIU process to evaluate all aspects of a request to change the designated uses of a trail and to develop appropriate management and design options to ensure sustainability of the trail and safety of trail users.
4. **Stakeholders:** The Department has solicited input from many neighbors, user groups, and government agencies. These stakeholders have been invited to participate in the development of this plan and to comment on the draft. In addition, the Department has hikers, mountain bikers, and equestrians on staff to assist with plan development and implementation.
5. **Non-System:** "Non-system" routes are trails that have developed over time by users and are not trails that were planned or are maintained by the Department. A non-system route may be converted to a system route if the trail meets a need in the park and is sustainable. If the trail is redundant, unsustainable, or routed through sensitive habitat, it will be slated for removal and rehabilitation. Non-system trails must be removed because they are often a source of resource damage and illegal trail uses. Moreover, the Department receives no funding for maintenance and patrol of non-system trails.
6. **Connectivity:** The Department's Best Management Practices listed in the RTMP include "maintain system connectivity and circulation patterns." Among the parkwide recommendations is "Loops and connections to regional trail systems are preferred, to give users more choices for the length and duration, as well as a greater diversity of terrain and experiences," and "For route connections and directional and interpretive signage, coordinate with regional, state, and national trail systems and organizations recognized under the California Recreational Trails Plan." While the Department cannot make recommendations for property owned or managed by

other entities, it will continue to work with other public and private land managers to maximize opportunities for trail connectivity. A specific connection recommendation can be found under Draft Recommendation MT #2, Knobcone Point Road, where the Department coordinated with the property owner to put the recommendation forward.

7. Priorities: Section 5.5 of the RTMP establishes the process for prioritizing projects as funding becomes available. Priorities must change over time based on staff capacity, funding availability, public demand, trail conditions, and variation in natural resources. By not establishing priorities based on today's needs, the plan will allow for flexibility to address those issues that are the biggest concern at the time a project can be implemented. Therefore, implementation priorities will be set at the time funding becomes available.

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1.	What trails being planned for accessibility/seniors?	Draft Recommendations for improved ADA access include MC #8, Moses Rock Ridge Trail-1 (recommendation to provide ADA accessible trail around Moses Ridge), MC #9, Muir Day Use-Juniper Trail-8 Connection (recommendation to provide ADA accessible trail connecting Muir Day Use Area to Juniper Trail, with additional ADA trail connection to proposed Moses Ridge Accessible Trail), NG #2, Mary Bowerman Trail-1 (recommendation to reconstruct and re-route entirety of Mary Bowerman Trail to meet ADA trail standards), and SG #1, Camp Force ADA Trail (recommendation to reconstruct and/or re-route Camp Force Trail to meet ADA standards).
2.	Supports extension of wheelchair access to Devil's Point Overlook. Advise engineering evaluation of wooden overlook structure (33 years old).	The accessible portion of the Mary Bowerman Trail is currently under construction. The wooden structure has been evaluated and is being reconstructed per recommendations.
3.	Don't support pave extended portions of the Juniper Trail. Could be a problem to maintain level pathways for wheelchairs.	Draft Recommendation MC #9, Muir Day Use-Juniper Trail-8 Connection, proposes a non-paved ADA trail to connect the Muir Day Use Area to the Juniper Trail. Draft Recommendation MC #8, Moses Rock Ridge

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		Trail-1, proposes a non-paved ADA loop trail around Moses Rock Ridge. Portions of the Juniper Trail between the Muir Day Use connection to the Juniper Trail and the Moses Rock Ridge ADA Trail could also be improved to provide a non-paved ADA compliant trail connection. There is no recommendation to pave trails on or connecting to the Juniper Trail.
4.	Bicycles should not be allowed in any natural area because they destroy the habitat.	Please see Response #1.
5.	Bicycles should not be allowed on the same trail as pedestrians and equestrians because of safety concerns.	Please see Response #1.
6.	Bicycles should not be allowed on single track trails. They should be restricted to paved roads.	Please see Response #1.
7.	Create bike-only trails.	It is Department policy to allow pedestrians on all trails in state park units. Therefore, the Department is not considering "bicycle only" trails at this time.
8.	Mountain biking is extremely popular and there are so few trails open to bicyclists in the Mt. Diablo region, please open more trails.	Please see Response #1.
9.	Fire roads are boring and paved roads are dangerous. Mountain bikers prefer single track trails!	Please see Response #1.
10.	Trails are under-utilized so there is no reason that	Please see Response #1.

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	bicyclists shouldn't be allowed.	
11.	When a trail is built correctly and people obey the rules, trails are safe for use by both equestrians and bicyclists.	Please see Response #1.
12.	Please build more new multi-use trails, especially single-track as well as for beginning and intermediate cyclists.	<p>Please see Response #1.</p> <p>Due to concerns for the natural resources in the park and because the park already has more trails than can be properly maintained with current staffing resources, efforts to develop multi-use trails will focus on the conversion of existing trails. However, the RTMP includes three recommendations for new multi-use trail connections: Draft Recommendations MC #2, Clayton Oaks Road and Cardinet Oaks Road Connection, MT #6, Jackass Canyon Trail and Tassajara Creek Trail Connection (now changed to Riggs Canyon Road to Tassajara Creek Trail), and NG #1, Buckeye Trail to Diablo Ranch Trail Connection. Draft Recommendation MT #2 also has the potential to provide a multi-use trail. In addition, three trails have been identified for a CIU designation to add bicycles: Juniper, Oak Knoll, and Summit Trails.</p>
13.	Being allowed to ride your bike on State property is a matter of civil rights.	Please see Response #1.
14.	Set aside a portion of the park for quiet contemplation of the wildflowers, views, and animal life	No trails that are currently designated as pedestrian only will be opened to other trail uses. In addition, the park will still be managed in accordance with the park's General Plan, which emphasizes "low-key recreation and preservation of the park's quiet character and beauty."

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15.	Please address the opportunity for improved road bike safety on paved roads.	A parkwide recommendation will be added to complete a road safety study to determine facility improvements, policies, and practices to improve visitor safety for both cyclists and vehicles, particularly in the areas of North Gate, South Gate, and Summit roads.
16.	Install obstacles such as pinch points and sharp turns to reduce bicycle speed.	The Department's trail development practices include the use of pinch points and other design elements to control user speed and enhance trail safety. A copy of the Department's Trail Handbook is available on its website. These types of speed control devices will be consider to improve safety along bicycle and multi-use trails.
17.	Refusal to allow bicycles is based on discrimination against bicycles and not the result of documented safety concerns. Plus, horses and cows cause more resource damage than bicycles but they are allowed.	The Trail Use Conflict Study in Volume II, Appendix C of the Draft CIU Program Environmental Impact Report found that "...the primary management concern on multi-use trails is conflict based on users' perceptions and behaviors." The report went on to identify both design and management options that can be implemented to reduce conflicts and allow for multi-use of trails. The CIU Process developed by the Department to determine where bikes can be safely added to a trail includes criteria to objectively evaluate the condition of a trail for multi-use. These criteria include the potential to implement recommended design and management options to reduce the potential for conflict.
18.	The Plan and associated Negative Declaration do not methodically characterize the relative risks to Mt Diablo's rare or endangered endemic plant and animal species as posed by mechanical erosion from trekking poles, hiking boots, bicycle tires, and horse shoes.	The RTMP is a planning-level document, not a project level document. Project-specific environmental review, including consultation with the California and US departments of Fish and Wildlife, will occur prior to implementation of specific recommendations herein. However, it is anticipated that by improving the trail system, the relative impacts from mechanical erosion will be substantially reduced.

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19.	<p>The City believes the Draft Initial Study Negative Declaration (IS/ND) for the Mt. Diablo State Park Road and Trail Management Plan Project is incomplete and inadequate as the IS/ND does not analyze or even reference any of the specific projects that are listed and proposed in Section 6 of The Plan. The IS/ND is an extremely generalized background report of potential environmental topics that may or may not even apply to the specific State Park projects listed, and therefore, the IS/ND fails to meet the legal environmental analysis requirements of the California Environmental Quality Act (CEQA).</p>	<p>The RTMP is a planning-level document that identifies desired improvements at the conceptual level only. Similar to the City of Clayton's Environmental Analysis of its General Plan, the Initial Study is not intended to discuss project-level impacts but simply reflects goals and objectives for future facilities. Additional environmental review will take place prior to implementation of any recommendations. Some actions that will require additional environmental documentation are listed on page 60 of the Draft RTMP. The Department recognizes that some recommendations may be found to be infeasible after further environmental review, or that external linkages may be found to be inappropriate or undesirable for residents in the vicinity. However, those determinations will be made on a case-by-case basis that will include consideration of input from area residents and adjacent communities.</p>
20.	<p>The City disagrees with the IS/ND's conclusion there is no substantial evidence the project or any of its aspects may cause a significant effect on the environment. The City considers the proposed Plan improvements identified above to indeed have a significant environmental impact on residential property owner/residents in proximity to those improvements, and yet no project specific analysis is provided.</p>	<p>Because the RTMP is a planning-level document, project-level design will be necessary before the potential impacts can be evaluated and mitigation considered. Furthermore, project-level design will not be undertaken without consultation, coordination, and cooperation from adjacent communities and/or potentially affected residents. Pursuant to 15152 of the CEQA Guidelines, a lead agency may use a tiering process when the development of detailed, site-specific information is not feasible and the review can be deferred until a future environmental document of a more limited geographical scale can be developed.</p>
21.	<p>The City disagrees with the IS/ND's conclusion that by applying Standard Project Requirements or SPRs (see p.</p>	<p>Pursuant to the Public Resources Code Section 21082, all public agencies are required to adopt procedures for the evaluation of projects and preparation of</p>

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	<p>61, Sec. 2.9), developed by the DPR, that no environmental impacts are caused by the project, and thus, no mitigations are required. All the SPRs listed and referenced in the IS/ND are essentially Mitigation Measures that must be recognized as such and incorporated in the Initial Study as project Mitigation Measures. Thus, the appropriate environmental review process in accordance with the California Environmental Quality Act (CEQA) would be in the form of either an Initial Study Mitigated Negative Declaration (IS/MND) or an Environmental Impact Report (EIS).</p>	<p>Environmental Impact Reports and Negative Declarations. Such procedures may take many forms provided that they are consistent with the requirements of Section 21083. DPR's CEQA implementation procedures are encompassed in the DPR Operations Manual Section 0600, and are fully consistent with PRC 21083. Under CEQA, the Department can be a Lead agency, Responsible agency, or a Trustee agency. On most projects, DPR is a Trustee agency and Lead agency as well as a project applicant. Over the years, the Department has developed a list of Standard Project Requirements that, although they appear to be mitigation measures, in fact are methods used to avoid impacts. Applicable project requirements are typically incorporated into the project plans, effectively self-mitigating any potential project impacts. This method is clearly permissible as indicated in Section 15002(h)(1) of the CEQA Guidelines, which indicate that changing a proposed project or imposing conditions of approval on a project are preferred methods for protecting the environment. Also, see <i>Lotus v. Dept. of Transportation</i> (Jan. 30, 2014) ___ Cal.App.4th ___, Case No. A137315.</p>
22.	<p>The City would, at a minimum, request that DPR require the IS/ND to identify the above listed Park improvements (MC#12, MC#13 & MC#14) as having the potential for significant localized environmental impacts and, therefore, those projects will require subsequent individual CEQA analysis, with direct consultation and scope input with the City, to ensure the potential environmental impacts on our community are fully and</p>	<p>As described in "Visitation to Mt. Diablo" on page 97 of the Draft RTMP, the RTMP is designed to support existing park use and is not expected to significantly increase the number of visitors to the park. Moreover, this document is not a project-level assessment. As described on page 60 of the Draft RTMP, project-specific environmental review will occur for recommendations, such as those made in Draft Recommendations MC #12-14, prior to implementation. However, in an effort to address the City of Clayton's concerns, the following will be added to Draft Recommendations MC#12, Mount Tamalpais Drive, and MC #13, Mitchell Canyon Trailhead:</p>

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	thoroughly studied.	<p>“Work with the City of Clayton and potentially affected residents to evaluate potential impacts from implementation of this recommendation and appropriate methods to minimize impacts.” In addition, Draft Recommendation MC #14, Regency Meadows, has been clarified to read “Work with the City of Clayton to improve access via Regency Meadows in accordance with the MDSP General Plan and the City of Clayton’s General Plan - Open Space and Conservation Element (Exhibit VI-1), while minimizing impacts to local residents.”</p>
23.	<p>MT #6, #7 and #8 focus on trail connections in the Jackass Canyon area of the Park. Such trail routing and the resulting impacts on falcons would be inconsistent with the ND prepared for the RTMP. We strongly suggest that potential new trails, formalization of non-system trails, and other potential associated actions in this area be routed away from lower Jackass Canyon.</p>	<p>In consideration of the sensitive resources in the Jackass Canyon area, Draft Recommendation MT #6, Jackass Canyon Trail and Tassajara Creek Trail Connection, has been modified as follows: “Create a multi-use connection from Riggs Canyon Road-2 to Tassajara Creek Trail-1 (northern portion extending southwest to northeast). Although initial evaluations indicate that a change-in-use of Tassajara Creek Trail-1 (northern portion extending southwest to northeast) is possible with modifications, a full change-in-use evaluation will be required prior to implementation. Note that the portion of Tassajara Creek Trail-1 paralleling the creek drainage from northwest to southeast is not recommended for change-in-use. The proposed new connection will create a multi-use loop using Riggs Canyon Road, Tassajara Creek Trail (northern portion extending southwest to northeast), Highland Ridge Road, and the other roads located in the Morgan Territory Area.”</p> <p>Draft Recommendations MT #7, Jackass Canyon Trail and Oyster Point Trail Connection, and MT #8, Tassajara Creek Trail and Riggs Canyon Road Connection, will provide enhanced protection for the natural resources of the area by relocating these</p>

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		<p>heavily-used, non-system trails to a sustainable layout. These modifications are intended to protect the peregrine falcon nesting site while improving overall trail opportunities in this area of the park. In addition, the following will be added to Draft Recommendation MT #7, Jackass Canyon Trail and Oyster Point Trail Connection: "Install interpretive signage at the end of the Jackass Canyon Trail to educate visitors about the natural and cultural resources of the site."</p>
24.	<p>The ND addresses storm water pollution prevention for new construction within the park but does not address the regular heavy equipment road grading work done on the park's fire roads. The grading work disturbs many acres of the park's surface and results in broad, steep, slopes having several inches deep of silt that are washed into the native creeks during storm events. The park needs a storm water pollution prevention plan for the fire roads and to implement storm water best management practices (BMPs) to protect the local creeks.</p>	<p>Pursuant to General Findings C-24 of the National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Order No. 2009-0009-DWQ, fire road maintenance falls under the category of routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility. Therefore, a storm water prevention plan is not a requirement for this activity. Currently, the park is working with CalFire on the park's wildfire prevention plan and the issue of fire road maintenance may be taken up at that time.</p>
25.	<p>The proposed ND states in Section 2.7 that some actions addressed in the RTMP, including new trails and roads, change-in-use projects, rerouting, and other actions will require the preparation of additional environmental documentation. However, immediately following this list of actions the ND states that these</p>	<p>This section of the ND will be edited for clarity.</p>

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	<p>actions may be considered "subsequent actions" and no additional CEQA documentation would be required. The issue of whether or not the listed actions would undergo further analysis is confusing. Exactly what kinds of activities from the referenced list would be considered subsequent actions? If it is determined that no further CEQA documentation beyond the ND is required, would any further environmental documentation of any kind be prepared? What activities would absolutely require additional documentation? The ND text should be revised so that the reader clearly understands which activities will be subject to further environmental review and which will not.</p>	
26.	<p>Work with adjacent land owners, such as Save Mt. Diablo, and other public agencies, such as East Bay Regional Parks, to improve connections and create loops between properties.</p>	<p>Please see Response #6.</p>
27.	<p>Support an easement across private property to connect Red Road to Burma Road to provide opportunities for a magnificent loop.</p>	<p>Please see Response #6.</p> <p>Note that Draft Recommendation MC #5, Red Road, has been removed from the plan. In general, the Department will not be making recommendations regarding private property in this plan.</p>

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28.	Need a trail that connects Round Valley, Morgan Territory and Mt. Diablo.	Please see Response #6.
29.	Only two area-specific planning recommendations focus on neighboring properties (MC #5 and MT #2). In the same line of thinking as MC #5, the RTMP should mention potential connections with several other neighboring properties	Please see Response #6. Also, please note that Draft Recommendation MC #5, Red Road, has been removed since, in general, the Department will not be making recommendations concerning private property in this plan.
30.	SMD's Young Canyon (near Mt. Olympia, in the Mitchell Canyon area in the RTMP) and Viera North- Peak (Diablo Mines/Perkins Canyon/ North Peak area) properties lie directly adjacent to the Park, but are not mentioned in the RTMP except as labeled properties on the map. They were purchased to protect the mountain's natural resources and are currently accessible using Park trails and fire roads. SMD's Lot 25 property, adjacent to Clayton on the north side of the Park, contains a fire road that provides legal access to the Park from Clayton. The RTMP should include requests to formalize trail connections through these properties and to work with SMD to ensure that potential future public access is managed responsibly and does not degrade the biological resources on site.	Please see Response #6.

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31.	<p>The Park could pursue trail connections from Viera-North Peak through SMD's Oak Hill Lane, Wright and Curry Canyon Ranch properties . While such a connection would have to pass through three short stretches of non-SMD property, it would create a north-south connection on Mount Diablo 's east side, all the way from Prospector 's Gap Rd to the Curry Cave Rd area. Done correctly, such a connection could join with existing trails and provide for several loop trails, increasing access and enjoyment of a new area of the mountain while ensuring the protection of its natural resources (especially sensitive cliff-nesting bird species that occur in upper Curry Canyon Ranch). Such a connection should be discussed in the RTMP .</p>	Please see Response #6.
32.	<p>If a connection could be made across the short distance of private land between the Park and SMD's Mangini property, which is located almost adjacent to the northwest corner of the park, Lime Ridge Open Space and the Park could be connected.</p>	Please see Response #6.
33.	<p>Encouraging connections between the Park and SMD's former Chaparral Spring property , now owned by East Bay Regional Park District (EBRPD) and located across Marsh Creek Rd along the</p>	Please see Response #6.

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	<p>Parks northeast corner, would be the next step in forming a connection between the Park and EBRPD's Black Diamond Mines Regional Preserve. The RTMP should discuss the potential for such connections.</p>	
34.	<p>EBRPD has also recently purchased the more than 200 acre Viera property (not to be confused with SMD's Viera North-Peak property which connects to Prospector's Gap Rd, east of the Diablo Summit) in the Morgan Territory Rd area and adjacent to Morgan Red Corral. This represents another land acquisition by a public agency for the purpose of conservation, and significantly increases connectivity between several protected lands, albeit some lands not currently open to the public. The RTMP should mention the Viera acquisition and the potential for future connections in the area.</p>	<p>Please see Response #6.</p>
35.	<p>The amount of bicyclists is grossly under-estimated. More accurate counts of park use and user conflicts are required.</p>	<p>Two parkwide recommendations will be added as follows: "Improve data collection regarding trail use and visitation to the park," and "Complete a road safety study to determine facility improvements, policies, and practices to improve visitor safety for both cyclists and vehicles S, particularly in the areas of North Gate, South Gate, and Summit roads."</p>
36.	<p>Section 4.1 "Road and Trail Designations" does not address fire roads such as Mitchell Canyon Road, Deer Flat Road, Prospectors Gap Road,</p>	<p>"Fire roads" are considered "roads" per the Department's Road and Trail Designations Policy because they were originally constructed for vehicular access. For the purposes of the RTMP, the fire roads at MDSP</p>

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	<p>Meridian Ridge Road, etc. The fire roads at Mt Diablo State Park are regularly graded to maintain access for heavy vehicles in emergency fire response events. Section 4.1 must contain a clear definition of the fire roads at Mt Diablo State Park and these fire roads must be classified under the category of "roads".</p>	<p>are considered "service roads" because they are maintained to allow maintenance and emergency vehicle access. Roads within a state park unit can also have designated recreational uses such as hiking, biking, or equestrian. The roads included in Section 4.1 are designated for hike, bike and horse use. Section 4.1 has been revised to clarify that fire roads are considered "roads."</p>
<p>37.</p>	<p>The Department's methods for tracking free day use are insufficient. Refine your methods and make the data available to the public.</p>	<p>The Department uses the most current statistical methods for determining the volume of public use and makes the data available to the public annually through the Department's Statistical Report. Nevertheless, a parkwide recommendation has been added to improve data collection methods. See response to Comment #35.</p>
<p>38.</p>	<p>The "trail" mileage reported in Section 6 is mostly road mileage. Correct this error and report the quantities of trail and road mileage for each designated use. *Add a column to this table that identifies each route as "road" or "trail". *Make Appendix Section 8 available on the website in spreadsheet and/or data-delimited format. *Report the trail and road sections of separately. *Add a column or columns to the table to identify each segment by area. - Appendix Section 8.7 "Parkwide Summary of Trails". Trail designations and mileage must be presented separately</p>	<p>Trail mileage reported in Section 6 will be updated to separate allowed use by "road" and "trail". Appendix 8.7 tables will be updated to separate allowed trail use by "road" and "trail". Road and trail segments cross and are often contained within more than one management area. In addition management areas overlap for readability. Therefore, calculations of trail segments per management area will not produce consistent results.</p>

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	<p>from roads - Fire road mileage and use designations must be reported as roads, not multi-use trails.</p>	
39.	<p>Publish or reference the criteria that are used to design or rate multi-use or mountain bike safe trails.</p>	<p>The criteria used to add designated uses to a trail such as mountain biking and equestrians are described in Section 3.6 of the Final CIU Program Environmental Impact Report, Volume I, which is available on the Department's website.</p>
40.	<p>Dogs are considered members of the family, and must be allowed access to the park system on at least some of the trails.</p>	<p>Dogs in state park units are regulated by the California Code of Regulations §4312. It is beyond the scope of the RTMP to recommend policy or regulatory changes on this issue.</p>
41.	<p>What is the legal and ethical responsibility of Mt. Diablo State Park, to reasonably insure the safety and enjoyment of all user groups?</p>	<p>It is the Department's mission to provide for the health and safety of the public while providing opportunities for high quality recreation. Moreover, as a department of the State of California, parks are managed in compliance with all State laws, rules, and regulations including the California Health and Safety Code. The CIU Process and associated Program Environmental Impact Report (PEIR) were designed to assist the Department in determining relevant trail safety and sustainability issues. Please see Chapter 3 of the PEIR for additional information on how the Department addresses trail safety.</p>
42.	<p>Every effort should be made to expand and support equestrian use, including placing watering troughs at staging areas where feasible and appropriate, given water use constraints. The RTMP would benefit from adding such text and additional ways to enhance the equestrian user experience in the Park,</p>	<p>Consideration is always given to the infrastructure necessary for trail users. Currently, the park provides these services for equestrians and will continue to do so to the extent possible. Proposed modifications to trails and associated infrastructure related to equestrian use will be considered during project-specific development.</p>

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	<p>such as making sure staging area expansion and modification is carried out with horse trailers in mind, especially at Riggs Canyon, Perkins Canyon and the North Gate entrances to the Park.</p>	
43.	<p>I would suggest that the state give greater consideration to the potential safety issues inherent in allowing animals that cannot be relatively controlled by their owner/rider be disallowed access to trails on state property.</p>	<p>Currently, the Department does not consider the condition or ability of a trail device being used (e.g. person, bike, horse). When a specific safety concern involving a device is identified, it will be dealt with on a case-by-case basis using design standards that are tailored to designated trail uses. Please see the Department's Trails Handbook and the Trail Conflict Use Study in the Change-of-Use PEIR for more information on safe trail design.</p>
44.	<p>I would suggest bags for the collection of horse feces to be required of any horses allowed on state trails, just as dog owners are required to do so.</p>	<p>No one wants to encounter feces on the trail. However, dog feces and horse feces are not similar. Horse feces is closer to wild animal feces in that it is mostly vegetative matter, biodegrades easily, and carries very few harmful pathogens. Dog feces, however, is full of harmful pathogens and can take many months to breakdown. It is also impractical for riders to stop and scoop up horse feces because the necessary tools and additional weight of the waste can be very cumbersome to riders. There are also additional safety concerns regarding riders dismounting and remounting along the trail. A rider typically has more control over a horse while mounted, as opposed to on the ground. Nevertheless, a parkwide recommendation will be added as follows: "If invasive plant species or other concerns warrant, park managers should consider management actions to restrict the introduction of (contaminated) horse feces, such as the required use of weed-free feed for stock or feces collection devices such as "bun bags" on short trails."</p>

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45.	Hopefully, state parks review current grading practices as unnecessary to grade at the current/past practices of put the blade down from trail start to finish.	The Department follows road maintenance standards and practices necessary to maintain access while preserving park resources. Road grading practices are necessary to maintain drainage, thus reducing erosion of the roadway and associated impacts to park resources. The Department is aware that road grading practices and standards need to be applied uniformly across the state park system and will continue to work toward this goal.
46.	Consider a bell box system so cyclists can use bells to warn other trail users of their approach.	The following will be added to the parkwide recommendations "Work with cooperating organizations to develop a bell box system for mountain bikes. This bell box system will provide free bells to be mounted on bikes for the purpose of audible awareness for other users."
47.	Prohibit bicycle use during winter months to reduce resource damage.	Seasonal restrictions will be considered on a case-by-case basis. Given the relatively strong soil at the park, most trails are not significantly affected by most rain events. Therefore, seasonal closures are not typically necessary. Nevertheless, the use of seasonal closures is listed as a Standard Project Requirement as necessary in the CIU Program Environmental Impact Report, Section 3.8.1.
48.	Develop rules to help manage user conflicts such as alternative days of use or restricting bicyclists to the uphill direction.	Please see Response #3.
49.	The plan indicates that all "non-system" roads and trails would be removed. This does not seem justified. Just because a road or trail is not a main route	Please see Response #5.

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	used by lots of park visitors does not make it undesirable for others.	
50.	Some roads and trails are also used for pipelines from springs that supply water to private property. The purchase agreements and deeds reserve water rights and ensure access for maintenance and repair. In the draft plan, some of these roads and trails are designated "system" and some are on "non-system". It is important that this infrastructure not be damaged and that access be maintained for future repair and maintenance.	The following has been added to the parkwide recommendation regarding non-system trails: "Non-system roads determine to be necessary for legal access will not be removed."
51.	Regarding closing some of the bootleg trails: Consider that these bootleg trails are made by people seeking a quieter natural experience away from the crowds. I understand these bootleg trails are disruptive to wildlife and can cause erosion. However, going off the beaten path is a unique gift from nature, not found on fire roads and busy trails. Could some trails be designated as "meditation trails" with "no talking zones" or even reservations taken so that one's visit is truly "away from it all"?	Please see Response #5. Many trails within the park will remain pedestrian only trails to preserve the type of experience described. Visitors may travel off-trail in most areas of the park if additional solitude is sought. However, such off-trail travel cannot result in a new trail or route or damage to natural or cultural resources.
52.	Section 4.1 "Road and Trail Designations", pg. 13, defines "trail" as "if it was not initially constructed to allow street-legal vehicle access and currently	The definition included in Section 4.1 is the Department's official definition of a "trail" and is considered adequate for the purposes of this RTMP. Please see Departmental Notice 2015-1 for more information.

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	<p>does not accommodate street-legal vehicles". This definition of "trail" is inadequate. A definition of "trail" that clearly and transparently defines the characteristics of a trail must be included in Section 4.1.</p>	
53.	<p>Increase park hours to open at 7 am in the summer to avoid recreating in the intense heat.</p>	<p>It is the Department's responsibility to provide a safe environment for visitors to recreate, while protecting natural and cultural resources. Park hours are established to maximize staffing resources while meeting budgetary constraints. Additional hours of operation are not feasible at this time.</p>
54.	<p>Try not to have non-mountain bikers decide what is, and what is not, a safe trail for mountain bikers</p>	<p>Per Department policy and State law, the Park Superintendent is responsible for designating trails that are open for bicycle use. Moreover, the Department has a professional staff of trail designers and health and safety professionals who assist Park Superintendents with trail designation decisions. In addition, CIU decisions are made by a team of park professionals that include natural and cultural resource managers.</p>
55.	<p>Didn't like Danville public meeting format</p>	<p>Suggestions for alternate public meeting formats are welcome and encouraged.</p>
56.	<p>Can you please change your language to hikers, bicyclists, and equestrians since bicyclists are far and away a larger user group than equestrians and should be recognized as such?</p>	<p>The order in which trail users are listed is not intended to reflect their relative abundance or importance.</p>
57.	<p>How will plan implementation priorities be set? Anyway to input to that?</p>	<p>Please see Response #7.</p>

#	Comment	Response
58.	Please consider an electronic trail map that users can download and then access on their smart phones while using the park trails. Trail maps help keep users on proper system trails.	The following recommendation has been added to the parkwide recommendations: "Develop new technologies to improve public access and information."
59.	Consider selling annual or seasonal park passes.	The Department currently offers an annual pass that is valid at most state park units. Annual Passes are available for purchase online. Passes can also be purchased in-person at the Park Pass Sales Office located in the Natural Resources Building, 1416 9 th Street, Sacramento, 95814 or http://store.parks.ca.gov/park-passes . Passes are also available at most district and sector offices and many state park units.
60.	Bikers pay nothing to use the park, so opening it up to more bikes simply increases the amount and maintenance required, emergency calls. This would cause the park more money without the compensating income.	All park users are subject to the same fees. As a public benefit, the Department tries to provide as much free access as possible. Typically among day users, state park units charge for motor vehicle parking only.
61.	There are a couple of large areas where no trails exist. These should continue to be a refuge for nature's creature. For them to escape, to refresh themselves, to feel secure, to procreate even.	The plan supports this idea through the parkwide recommendations, which include "roads and trails shall not fragment large areas of open space or viewsheds. The overall aesthetic quality of the park...should be a primary consideration of road and trail design and management."
62.	How will trail rules be enforced given the park's current staffing levels?	In general, trail design and management options are selected to assist in the enforcement of trail rules and to provide for user safety. When a new use is added to a trail, design and management options are considered and implemented in accordance

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		<p>with the CIU Process. It is anticipated that adding bicycle use to trails where it is safe and appropriate will reduce the need for law enforcement by legalizing some popular illegal routes. In addition, as part of the CIU implementation, the park will work with volunteer groups to improve user education and encourage self-enforcement by user groups. Please see the Final CIU Program Environmental Impact Report (CIU PEIR), Volume 1, Chapter 3, and Draft CIU PEIR, Volume 2, Appendix C for additional information on enforcement strategies.</p>
63.	<p>Change the "Diablo Mines" title to "Perkins Canyon", since this area of the Park is currently known as the Perkins Canyon area. This would help simplify and avoid potential confusion in the RTMP.</p>	<p>The area is known by various names. For management purposes, we have assigned the name "Diablo Mines"</p>
64.	<p>The northeast corner of the Park, north of the Diablo mercury mine, is known as the Three Springs area. Rename the area to the already recognizable name in the RTMP to prevent confusion.</p>	<p>Please see the response to Comment #63.</p>
65.	<p>MT #2 -The Curry Canyon Ranch property that this recommendation focuses on has been one of the Park's highest acquisition priorities for decades. A road or trail easement is not adequate. The Park should describe Curry Canyon Ranch as a high acquisition priority as it has been for decades.</p>	<p>Please see Response #7.</p> <p>The recommendation to acquire Curry Canyon Ranch is included in the park's General Plan. Draft Recommendation MT #2, Knobcone Point Road, has been modified as follows: "Work with landowners to acquire Curry Canyon property for public and administrative use."</p>

#	Comment	Response
66.	<p>We recommend that the RTMP include a prioritization list for the removal of non-system trails, as some of these trails are located in areas with highly sensitive biological resources (i.e., cliff-nesting bird species) or cause greater impacts (i.e., severe erosion) than others. Developing and implementing a priority list for removal would ensure that the most problematic areas receive treatment as soon as possible. We strongly suggest that the non-system trails located in the Castle Rock, Jackass Canyon and Knobcone Point areas be the first non-system trails removed from the Park due to their impacts on cliff-nesting bird species that are sensitive to human disturbance.</p>	<p>Please see Response #7.</p>
67.	<p>The conversion of the first section of the Mary Bowerman Trail (NG#2) to ADA specifications should be the number one priority in the trail upgrading program. However, the Mary Bowerman trail runs through an area that is very high in natural resource and aesthetic values. If reconstruction and re-routing of the trail is to occur, the RTMP should include text describing the high resource values of this site and specifying that negative impacts to the area will be avoided and minimized to the maximum extent possible. This planning</p>	<p>The first section of the Mary Bowerman trail is currently undergoing reconstruction to improve accessibility and sustainability. This project includes the required environmental study and documentation to protect natural resources. Draft Recommendation NG #2, Mary Bowerman Trail-1, calls for reconstruction of the trail to accessibility standards and re-routing, as necessary, for the entire Mary Bowerman Trail. As with all recommendations presented in this RTMP, site specific environmental compliance and permitting will be required prior to implementation of individual recommendations.</p>

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	<p>recommendation in particular is one that should require full environmental review when project specifics are being planned. Stating so in the ND or the RTMP would help ensure that the protection of natural resources is being given the highest priority.</p>	
68.	<p>I know there will have to be some prioritization of projects due to funding issues. I would request that adding parking and facilities at Finley Rd, Red Corral and the lower end of Camel Rock Trail be made high priority. These are under-utilized areas of the Park and adding parking would make them much more attractive to potential users. These staging areas should include adequate space for horse trailer parking and, if feasible, a stock water tank.</p>	<p>Please see Response #7.</p> <p>At the time of project development, a plan for trail amenities such as staging areas will be developed in consultation with trail user groups.</p>
69.	<p>Where will the necessary funding come from to implement this plan? Following the Department's financial crisis of a couple of years ago, it seems sufficient funds are still not available for the simplest jobs of maintenance, salaries of staff , etc.</p>	<p>Funding availability for road and trail development and maintenance continues to be a struggle for the Department. However, some funding is available for capital improvements, particularly improvements to enhance a park's accessibility. Funding for trail projects is also provided through donations, park maintenance budgets, and State and federal grant programs for the development of recreational trails.</p>
70.	<p>Back Creek road washout: This has been washed out for several years, and it is now to the point of being very difficult for some horses to cross. At</p>	<p>The Back Creek washout has been identified as a maintenance need and will be addressed as soon as possible. In addition, Draft Recommendation MC #16, Bruce Lee/Murchio Roads, calls for a road-to-trail conversion on</p>

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	<p>the original creek crossing point there is an old jagged culvert pipe sticking out that is dangerous. The fire crew bulldozer cut another path through the creek last summer, but that is very steep and scary for some horses. Repairing this fire road, either with a bridge or a large enough culvert, should be a high priority for the park.</p>	<p>this section of road.</p>
71.	<p>Use signage to keep people off non-system trails.</p>	<p>Please see Response #2.</p>
72.	<p>I agree with removal of illegal trails and would encourage the use of some sort of small or temporary signage to remind users of what is deemed to be an illegal trail. Often cattle start a trail and then users explore what looks like a trail when a simple sign could reduce the traffic.</p>	<p>Thank you for the suggestion. See Response #2.</p>
73.	<p>Need signage where the trail goes from EBRPD to Mt Diablo prohibiting dogs.</p>	<p>Please see Response #2. This signage already exists although it is frequently vandalized.</p>
74.	<p>Please mark trails with safety and educational signs that cyclists should defer to horses. There should also be trail markers where horses +/- cyclists should not be. Markers should be of sufficient material to prevent vandalism.</p>	<p>Please see Response #2. This signage is already used and will be modified as necessary. In addition, a recommendation has been added to the parkwide recommendations as follows "Improve interpretive, regulatory, and way finding signage as resources allow."</p>
75.	<p>Provide signage on fire roads in areas with poor sight distance. I personally will donate funds for</p>	<p>Please see Response #2. The Department appreciates your generous</p>

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	materials and work with the park staff to identify high risk areas and organize work crews to put in place signage.	offer to fund signage needs. Please contact MDSP's Supervising Ranger if you would like to follow-up on this offer.
76.	The RTMP should include a description of the Diablo Trail and direction to sign the trail as the "Diablo Trail" along its length within the Park as well as reference the Diablo Trail on official maps. Current trail names that make up the section of the Diablo Trail within the Park are: Mount Diablo Regional Trail, Wall Point Rd, Knobcone Point Rd, Black Hawk Ridge Rd and Oyster Point Trail.	Please see Response #2. The park does not recognize a regional Diablo Trail.
77.	NG #5 proposes the development of a trailhead and amenities at the Northgate Entrance, yet the RTMP does not seem to recognize that the Gateway property was purchased with a Northgate Entrance modification in mind (Fig. 2). Using the Gateway property, it may not be necessary to acquire additional property, as NG #5 currently recommends. The RTMP should elaborate on this and add specificity to the recommendation to take full advantage of the Gateway property for future entrance modifications.	Draft Recommendation NG #5 has been modified as follows: "Work with the Contra Costa County Flood Control and Water Conservation District, Save Mt. Diablo, East Bay Regional Parks, and other cooperating agencies as necessary to develop the Gateway property near the North Gate entrance station to develop a 40-car parking lot, staging area, and turn-around. Acquire a public easement for trails along North Gate Road from the entrance to the park boundary, if feasible."
78.	We fully support the creation of a connection between the	A new recommendation (DM #6) has been added to the Diablo Mines Area as follows:

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	<p>Ridgeline Trail and Powerline Service Rd. (DM #2), and we are supportive of the plan to decommission the "aint-finished-yet" trail that climbs up the east side of north peak from Power Line Service Rd 1. The trail is incredibly steep. Although it functionally doesn't make sense in its current alignment we suggest investigating potential connections from the Ray Morgan Rd or Diablo Mines Trail-I to Prospectors Gap Rd, potentially using SMD's Viera North Peak property. This would connect the currently isolated system of trails along Morgan Territory Rd. to the larger Park trail system. Constructing such a trail now, after the September 2013 Morgan Fire, would result in fewer environmental impacts of trail expansion.</p>	<p>"Work with Save Mount Diablo to investigate possible trail route from the Power Tower portion of the Diablo Mines Area to Prospectors Gap Road-3 using State and Save Mount Diablo properties."</p>
79.	<p>We would like to recommend that the RTMP include text in an appropriate section, perhaps the Diablo Mines/Perkins Canyon section that briefly describes the benefits of a potential Marsh Creek Trail running from Clayton to Brentwood along Marsh Creek, Marsh Creek Rd. and through the new Marsh Creek State Park. Efforts are currently underway to include such a trail in County transportation plans. The trails in the Diablo Mines/Perkins Canyon area of</p>	<p>Please see Response #6.</p>

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	<p>the Park would be natural connectors to the future Marsh Creek Trail, and could provide a brand new bike to hiking trail route for Park users. Including a brief discussion of the future Marsh Creek Trail would also give a greater sense of connectivity in the RTMP between the Park and current conservation efforts in surrounding lands.</p>	
80.	<p>In 2011 the final two gaps in a grand trail and open space loop were protected, stretching in a northern crescent from Round Valley back to the Park. It is our hope that one day a 60-70 mile Grand Diablo Loop Trail will circle north back to the mountain through Marsh Creek State Park and Black Diamond Mines Regional Preserve. Most of this trail loop has already been mapped and although the trail corridor is complete, not all lands are yet open to the public. Our regional recreation map similarly includes the proposed route of this "Grand Loop." While SMD's map includes a proposed route and we believe the Grand Loop concept should be included in the Road and Trail Management Plan, the concept is simply SMD's and no route has been discussed outside the organization or achieved any consensus yet.</p>	Please see Response #6.

#	Comment	Response
81.	<p>Tickwood trail erosion: Just above where the Tickwood trail takes off from the Back Creek trail, there is severe erosion that narrows the trail quite a bit. There is a board on the down side that was originally holding up the trail, but now there is a big opening between the dirt trail and the board, making the trail narrower. This condition also has been ongoing, is getting worse, and needs to be repaired as soon as possible.</p>	<p>The situation you described resulted from years of improper trail maintenance. In July 2015, this section of trail was rehabilitated to remove the berm and overhanging vegetation that were capturing water runoff, resulting in increased trail erosion and a narrow trail tread. The rehabilitated trail has been moved to the outside edge of the trail cut where a new, firm tread surface up to five feet wide was created. Maintenance crews will continue to monitor this section of trail to ensure that the rehabilitation work is sustainable.</p>
82.	<p>Diablo Mines - I would like to see some of the non-system, trails stay. They have been used by deers and other wildlife plus then used by riders. I know that some will have environmental issues but they are lovely to travel on if a few could stay open.</p>	<p>Please see Response #5.</p>
83.	<p>Multi-use loops are sorely missing on east side of Mount Diablo or MT#2, #6, #7, and MT#8</p>	<p>Please see Response #1.</p> <p>In addition, Draft Recommendation MT #6 (as modified) will provide for multi-use loops on the east side. Draft Recommendation MT #2 has been modified and has the potential to provide a multi-use loop. Please see the responses to Comments #23 and #65.</p>
84.	<p>Establish a trail connection to the existing Marsh Creek Road under-crossing (37.908588, -121.876473).</p>	<p>Please see Response #6.</p>
85.	<p>Coordinate with EBRPD to establish a regional trail between Clayton Ranch/Black Diamond Mines and MDSP.</p>	<p>This regional trail has already been established and the Department will continue to work with other agencies to enhance connectivity.</p>

#	Comment	Response
86.	Reroute mid-portions of Staircase trail (north of Rock City - 37.853039, -121.933433) to avoid unsustainable, eroding sections.	Problematic portions of this trail have been identified for re-engineering and reconstruction as shown on the Maintenance Recommendations Map for the South Gate Area.
87.	MT#5. Relocate the proposed connection between Morgan Creek Rd and Old Finley Rd to near park boundary (37.851619, -121.848377). The current proposal (as described in the draft management plan) will not eliminate the bootleg trails near the park boundary. The desire line is near the park boundary and a sustainable trail route is available there (with one switchback and a short section of fence to prevent cutting the switchback). It also takes advantage of an existing culvert in the creek to avoid further creek impacts.	Based on our field reconnaissance, the proposed alignment is the most sustainable. At the time of project implementation, the trail alignment will be re-evaluated. Currently, there is a property line dispute. Until that dispute is resolved, the proposed alignment is believed to be the most sustainable.
88.	Request access through the Genochio property and Mangini Ranch land bank (Save Mount Diablo) to establish a hiking connection between Red Road in MDSP (37.907593, -121.963012) and Walnut Creek/Concord's Lime Ridge Open Space.	Please see Response #6.
89.	Re-route Burma Rd. as it is crazy steep and fairly slippery when walking down.	Burma Road is a historic road and cannot be realigned per historic preservation laws. Sections of the road have been identified for reconstruction/reengineering to address sustainability and safety issues.

#	Comment	Response
90.	MC #15 - concerns for springtime carpets of Miniature Baby Blue Eyes and Birds Eye Gilas that grow on the sand of a short section of Black Point Road that is slated for conversion to a trail.	By converting the unsustainable road to a sustainable trail, opportunities for springtime carpets of wildflowers will be increased.
91.	Mother's Trail (NG#3) is in need of rerouting, not elimination.	The plan calls for the trail to be re-routed and the old alignment to be removed and rehabilitated.
92.	Do not eliminate the Ridge View Trail (SG#3) because it is one of the small, intimate "secret trails" on the mountain and prime site for calochortus - the globe lily and 3 species of Mariposa lily and fabulous view from Sentinel Rock Ridge.	This trail is not sustainable and there is no viable re-route that would be sustainable. Therefore, to protect the natural and cultural resources, this trail has been recommended for removal.
93.	Do not remove the Blaisdell Trail (DM #4).	This trail is not sustainable and there is no viable re-route that would be sustainable. Therefore, to protect the natural and cultural resources, this trail has been recommended for removal. The Sattler Trail can be used as an alternative route in this area.
94.	Do not open MC6 and MC7 to bikes. These trails are part of a special type of interpretative trail system, the Trail Through Time, and are therefore not appropriate for bicycles.	CIU is not expected to alter the interpretive opportunities along this route. Upon project implementation, trail modifications will be identified to address safety concerns, such as trail widening around interpretive installations.
95.	The plan to remove all the unauthorized single track trails in the area from the Concord Mount Diablo Trail Ride Association's property east toward Marsh Creek and	The area you described will be added to the area covered under Draft Recommendation DM #1, Power Tower Area, "Remove and/or re-route trails as necessary to protect habitat while providing loops and destination trails."

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	<p>Morgan Territory Roads is doomed to failure unless a single track loop system is officially designated to serve users in that area. In this area there is a real need for a well-designed single track loop system for equestrians and hikers</p>	
96.	<p>Do not remove the Donner Cabin Trail (MC #1). It is a loop connector to Hetherington Trail. It is not redundant because it provides a much needed alternative route to get from Donner Canyon Road to Tickwood as following Donner Road to the eastern terminus of Tickwood means a very, very steep, and unpleasant, climb on the fire road. The Donner Cabin Trail gives users a beautiful single track experience as they follow the contour up to a saddle with amazing views.</p>	<p>Draft Recommendation MC #1, Donner Cabin Trail-1, will be deleted.</p>
97.	<p>Not clear if you are proposing a new trail connecting Stage Rd with Castle Rock Trail through the Castle Rock formations. I hope not.</p>	<p>The plan does not propose a new trail in this area. Instead, the recommendation is to reduce the number of existing trails to one.</p>
98.	<p>What are the Department's plans for maintenance and repair? Some trails being exceedingly steep and needing heavy equipment for maintenance. For example, Burma Road, Prospectors Gap Rd (just below the gap), North Peak Trail at Devil's Elbow,</p>	<p>The Department's plans for maintaining roads and trails are identified on the "Maintenance Recommendations Maps" for each area of the park. Road and trail maintenance will be implemented per resource availability.</p>

#	Comment	Response
	Mother's, East, Sattler, Tassajara Creek trails.	
99.	What will the Department do about trails with hazardous footing, such as the eroded sections of Sattler Trail on its descent to Olympia Trail and the Tassajara Creek Trail section from Highland Ridge Rod to Bob's Pond Overlook.	The Department's plans for maintenance of roads and trails are identified on the "Maintenance Recommendations Maps" for each area of the park, as well as in Section 8.5 of the RTMP. Road and trail maintenance will be implemented as resources are available.
100.	Convert the informal trail between Balancing Rock and Oyster Point Trail (aka Peregrine Falcon Trail) to a system trail.	Natural resource concerns associated with the peregrine falcon nesting site preclude this trail from being incorporated into the system.
101.	Refer to pg 48 of RTMP - This map refers to Maintenance Recommendations and includes 'Remove non-system routes'. Specifically on this map is a non-system route that is an extension of Highland Ridge Road after it has left the park boundary and returned into the park. It then continues into the land currently owned by Save Mount Diablo. As it is likely that the parts of this road that are outside the park boundaries at this time will be brought into the park at some future date and connect Highland Ridge Road through to Knobcone Point Rd. It would be inappropriate to remove this section of non-system route only to have to reconstruct it at that later date. I recommend not removing this non-system route.	The section you have identified should have been identified as a "system route" and not slated for removal. The RTMP has been edited appropriately.

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102.	Why are Buckeye Ravine and Diablo Ranch trails shared single track, yet Little Yosemite, Secret, Trail Thru Time, and Devils Slide are not?	The current use designations for Diablo Ranch and Buckeye trails were made by a previous superintendent under a Superintendent's Order, prior to implementation of the Department's CIU Process. There is no documentation of what criteria were used to evaluate these trails for bike use. The CIU Process is meant to provide a consistent evaluation with documented results. The Secret Trail was evaluated and determined to not be sustainable for bicycle use. CIU requests for Little Yosemite, Trail Thru Time, and Devils Slide can be made under the on-going CIU Process described on the Department's website.
103.	SG1 - could this be connected with Trail through Time for a loop?	Given the topographical restraints of the area, a sustainable connection cannot be designed.
104.	The Plan calls for the removal of the so-called Morningside Trail running up the summit of North Peak from the mine area. I can understand the difficulty of upgrading the trail to bring it to standards but do we have to remove it? How about just ignoring it?	Please see Response #5.
105.	The Plan does not speak to existing parking areas. Mitchell Canyon gets full during peak weekends and could use more parking spaces. The answer could be as simple as removing the two rock piles that take up tens of spots right now.	The parkwide recommendations include "connections to parking areas and pedestrian access points shall be provided and/or improved." In addition, Draft Recommendation MC #13, Mitchell Canyon Trailhead, includes connection improvements to existing parking areas
106.	There is no way to construct a trail through the Lower Jackass Canyon (MT#6) area without adversely affecting the nesting	The part of Draft Recommendation MT #6, Jackass Canyon Trail and Tassajara Creek Trail Connection, that calls for a connection between the end of Jackass Trail and Riggs

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	<p>prairie falcon and likely causing them to abandon Lower Jackass as a nest site - a significant impact under CEQA. MT#6 Trail connects the Upper Riggs Canyon Road with Tassajara Creek Road through Lower Jackass Canyon - serves as a refuge for wildlife species that are not tolerant of human activity. The existing dead end Jackass Trail should be removed to minimize human encroachment into this important habitat area. The Knobcone Point area should be protected in the same manner, including permanently closing off the illegal trail which connects to the two PG&E tower line access roads on the east side of Knobcone Point.</p>	<p>Canyon Road has been deleted due to resource concerns. The recommendation for a connection between Riggs Canyon Road and Tassajara Creek will be retained. The trail in the Knobcone Point area has been identified as a non-system trail and slated for removal and rehabilitation.</p>
107.	<p>Convert Bruce Lee Road to trail from Murchio Road. Back Creek Trail installing a bridge for horse riding, biking, and walking.</p>	<p>The road-to-trail conversion of Bruce Lee Road is recommended in the plan (Draft Recommendation MC #16, Bruce Lee/Murchio Roads). Upon implementation, a bridge or other crossing structure will be installed on Back Creek Trail.</p>
108.	<p>Cliff/rock outcrop habitat is the most restricted in extent habitat type in the park. Of the four major cliff/rock areas in the park (Rock City, Castle Rock, Knobcone Point, Jackass Canyon) two are already open to public use (Rock City, Castle Rock). The remaining two cliff/rock outcrop associations (Knobcone Pt/Jackass Canyon) need to be protected for their resource values.</p>	<p>Draft Recommendation MT #6, Jackass Canyon Trail and Tassajara Creek Trail Connection, has been modified to help preserve Jackass Canyon rock outcrops and associated habitat. Please see the response to Comment #23.</p>

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109.	Please put bypass trail around CMDTRA so hikers plus cyclists don't have to go onto private property. Cyclists bend over the signs or cramp them so the sign can't be seen.	Draft Recommendation MC #2, Clayton Oaks Road and Cardinet Oaks Road” has been modified as follows: “Provide a new, multi-use trail connection between Clayton Oaks Road-5 and Wasserman Trail-1. Prior to development of a new multi-use trail conduct change-in-use evaluation along the section of Wasserman Trail-1 paralleling the park boundary to determine multi-use compatibility. If change-in-use is recommended, the new trail connection to Wasserman Trail-1 and the re-routed section of Wasserman Trail-1 for multi-use would provide a multi-use connection between Clayton Oaks Road-5 and Cardinet Oaks Road-2.”
110.	Rather than removeing the Ain't Finished Yet (Sunrise Trail), improve it and make it more stable. This is a little known trail but a good challenge.	Please see Response #5. The alignment of the Sunrise Trail is not sustainable.
111.	MC#14, Regency Woods. The City is concerned with the proposal to develop trail head, parking for six to ten cars, and a small staging area at the dead-end terminus of Regency Drive using public right-of-way and City real property [open space]. A detailed Traffic Study, with emphasis on vehicle access and parking should be prepared (with scope input from the City) to evaluate the potential vehicle traffic, access and parking impacts the proposed improvements may have on the adjacent single-family homes and neighborhood. The City further requests the DPR to directly notify and involve the real	The MDSP General Plan specifically states “The Regency Meadows subdivision, located to the north of the park and off Marsh Creek Road, dedicated 6.7 acres and a 25-foot wide public road easement to the park. A trailhead with parking would provide additional access for Clayton and Concord Residents.” The recommendation in the RTMP has been re-written to better reflect the intentions of the unit’s General Plan and to address the concerns of the City of Clayton. Please see the response to Comment #22

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	<p>property owners/residents who front on and/or abut Regency Drive to solicit those property owner/residents review and input on any proposed Park improvements at this location. And finally, it appears DPR desires to use public right-of-way and City real property, which must involve discussions with and formal approval by the City (see attached aerial photo map).</p>	
112.	<p>The draft plan designates fire roads as multi-use trails - This seems to be in error.</p>	<p>All routes designated as “primitive service roads” or “fire roads” allow bike, horse, and pedestrian use. The Department will separate mileage statistics for designated uses on “roads” and “trails”. This information will be presented in the final draft of the RTMP.</p>
113.	<p>Diablo Mines - Quicksilver Trail: I hope the re-route does not close off that trail. It is beautiful.</p>	<p>The Draft RTMP calls for the Quicksilver Trail to be re-routed away from private property and sensitive habitat. There is no plan to remove or close the trail.</p>
114.	<p>Request more bike access to single trail east of Mitchell Canyon and west of Canyon Oaks, north side of mountain.</p>	<p>Please see Response #1.</p>
115.	<p>I don't understand the reconstruction on the Tassajara Creek Trail. The trail is in good shape along the Curry Canyon Ranch fence.</p>	<p>Based on an evaluation by a professional engineering geologist, this section of trail displays slight entrenchment, moderate fill slope instability, slight undrained water on the trail, and moderate watercourse bank instability. The trail is in relatively good condition, so reconstruction efforts would be limited in scope.</p>

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116.	The proposed re-route of Jeremiah Creek Trail is not necessary and will result in persistent bootleg trails near the boundary fence (to old Finley Rd) and in the trail removal area (to ridge). Look at the design lines. The existing Jeremiah Creek Trail west end can be made sustainable.	Portions of this trail were found to be unsustainable. Re-routes were recommended as a corrective action.
117.	Don't close the lower Dan Cook/Summit Trail. This trail roughly parallels another singletrack trail through the lower Dan Cook Canyon. Having two routes through this heavily used trail section helps lessen congestion and minimizes trail conflict. These two trails could also be combined as a clockwise only or counter-clockwise only loop or one trail could be designated for bicycles and one for pedestrians and equestrians.	This non-system route is not considered sustainable and has been recommended for removal to prevent impacts to natural resources.
118.	Don't open the Oak Knoll Trail to bikes. Oak Knoll starts very close to the junction of Green Ranch Rd and Summit Rd. and ends up on Green Ranch Rd. So the bikes end up in the same place as if they had simply started at Green Ranch Rd. Also, Oak Knoll Trail is one of the better trails for wildflowers and many photographers use it. It would create an unsafe situation to have bikers riding down the trails while photographers have their tripods out.	The Oak Knoll Trail CIU was requested by mountain bikers because it is a single track trail. The Green Ranch Road does not provide this opportunity. The CIU evaluation for Oak Knoll found that biking would be a compatible use on this trail. The CIU recommendation includes trail modifications such as trail widening and incorporating passing areas to provide for multi-use. The MDSP CIU Summary is available through a link at www.parks.ca.gov/mdsp-rtmp .

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119.	Open Camel Rock trail to bikes. The map shows it as a degraded road bed, similar to the Buckeye Trail. Buckeye was changed years back to also be a bike trail. Camel Rock would allow a longer bike route on that side of the mountain.	The CIU request to add bicycles to the Camel Rock Trail was denied by the evaluation team because it was determined that if mountain bikes are allowed, the trail would be extremely difficult to sustain with regular cyclical maintenance unless portions of the trail were re-routed, particularly in and out of drainages. The steepness and number of drainage crossings with grade issues would require that almost the entire trail be re-routed to maintain overall sustainable grades and minimize resource impacts. Because this trail is on a portion of the park bordered to the northwest by private property and to the southeast by North Gate Road, there is not adequate space to create a sustainable trail that would use the same trailheads as the existing trail. The major re-routes and modifications required for sustainability and safety could have significant impacts to park resources. See the MDSP CIU Summary at www.parks.ca.gov/mdsp-rtmp for further information.
120.	Define the Civilian Conservation Corps Trail to Sentinel Rock.	This recommendation has been incorporated into Draft Recommendation SG #5.
121.	Consider access for mountain bikers to such narrow trails as Little Yosemite, Secret Trails, Devil Slide, etc.	Please see Response #1. A request to add bicycle use to the Secret Trail was evaluated during the RTMP development process and denied. Please see the MDSP CIU Summary at www.parks.ca.gov/mdsp-rtmp for more information. A CIU request may be made for Little Yosemite and Devils Slide trails per the CIU Process outlined on the Department's website.
122.	Southgate to Summit Planning Recommendation: SG-3 proposes removing Ridge View Trail. I disagree with the recommendation's contention	This trail is not sustainable and there is no viable re-route that would be sustainable. The number of switchbacks required would not be considered a sustainable design per the standards of the Department's Trails

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	<p>that alternate routes can be used. The only alternates I can see are either the Staircase Trail or Secret Trail to BBQ Terrace Road. Depending on the intended route an alternate could pose a much longer route or much more elevation gain than desired. This should be retained as a hikers trail. It seems to me some well placed switchbacks could allow for a re-route of this trail to avoid climbing straight up the fall line. I suspect that removing the trail would only make some want to continue going up “cross country.”</p>	<p>Handbook. Therefore, to protect the natural and cultural resources, this trail has been recommended for removal. The Summit Trail provides a reasonable alternative.</p>
123.	<p>Morgan Territory to Summit: Any consideration for establishing a trail between Rhine Canyon Rd and Prospectors Gap Rd, failing any ability to obtain the private property to the east and be able to use the existing roads there?</p>	<p>This area has been evaluated for a potential trail and was determined to be unsustainable without crossing onto private land.</p>
124.	<p>Mitchell Canyon to Summit: MC-6. Want to know more details on the required modifications. Would the trail from Juniper Camp to the junction at Summit Trail be widened? While I don't like that idea, I am very concerned about mixing bike traffic with hiking traffic. I am also concerned about the accelerated erosion that might take place on the single track section of Summit Trail just</p>	<p>Please see the MDSP CIU Summary at www.parks.ca.gov/mdsp-rtmp. It was determined that this critical, non-paved, multi-use route to and from the summit area could be achieved through the implementation of design and management options necessary to address safety and sustainability concerns. Design modifications could include pinch points, vegetation clearing, drainage crossing reconstruction/re-engineering, tread texturing, trail widening, and re-routes. Although design modifications could negatively impact natural and cultural resources, it is anticipate that these impacts could be avoided, minimized, or</p>

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	below Pioneer Horse Camp.	mitigated during project development. Management actions, such as one way travel, alternating days of use, improved signage, increased patrols, and seasonal closures, will also be considered.
125.	I am in favor of the plans to build a staging area at the end of Finley Road. I assume this would provide additional trail access for cyclists as well as hikers and equestrians.	Trailhead improvements will be available for all park visitors.
126.	In Mitchell Canyon: What does "enhanced ADA and vehicle access in the staging area" mean? Are you going to pave the parking lot? What will be involved in "re-engineer[ing] bridges to connect parking locations"? Are you going to be cutting down trees that line the creek, possibly destroying or diminishing the shady, beautiful, and heavily used, picnic area that exists now?	The RTMP is a planning document and lacks many of the details associated with a project-specific evaluation. However, it is anticipated that a limited number of spaces will be paved for improved accessibility. ADA improvements to existing restroom facilities also will likely occur. Any bridge modifications will limit disturbance to natural resources to the extent possible and will require environmental review pursuant to CEQA and other applicable laws prior to implementation.
127.	Please do not remove the unofficial trail from the utility road above Perkins Canyon to the North Peak until an alternate trail connection is created.	Please see Response #5.
128.	Concerns about the plan for parking for 20-25 cars at Perkins Canyon area as this appears to be a very narrow strip owned by the Park that may interfere with private property.	This recommendation was originally identified in the 1989 General Plan and the Department believes it is still feasible. The number of cars that can be parked at the site will be determined during project-specific review and will be based on the limitations of the resources and available land base.

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129.	MC# 12, Mount Tamalpais Dr. Concerns with the proposed trail improvements at this location, due to the limited and poor vehicle access and on-street parking that currently exists at the dead-end terminus of Mount Tamalpais Drive plus the potential vehicle trips that will be added to Mount Tamalpais Drive and the Dana Hills neighborhood.	The potential impacts from development of Draft Recommendation MC #12, Mount Tamalpais Drive, will be analyzed and mitigated as necessary during the project-specific environmental review at the time of project development. This recommendation has also been edited. Please see the response to Comment #22.
130.	Open a single track route from North Peak Trail to the bottom near Regency or Mitchell areas.	Please see Response #1.
131.	<ul style="list-style-type: none"> ▪ Open up Back Creek ▪ Open up Middle Trail ▪ Open up Wasserman Trail ▪ Way down the mountain by trail not by Fire Road please. 	<p>Please see Response #1.</p> <p>Note the parkwide recommendation “Consider providing non-paved, multi-use routes to the summit.” In addition, Draft Recommendation MC #6, Portions Of Juniper and Summit Trail, will provide a non-paved route up and down the mountain for cyclists utilizing existing non-paved roads and trails.</p>
132.	DM2 - Make this trail multipurpose. Have it connect with Sattler from the Power Line Rd. This could be a large loop.	<p>Please see Response #1.</p> <p>The Sattler Trail is a hike/horse only trail, therefore, this connection cannot be recommended as part of a multi-use loop at this time.</p>
133.	I propose opening the following to mountain bikes: Camel Rock, Castle Rock (on the ridge top), Sunset and Secret Trails. These trails are good candidates because they receive relatively little use, allow good visibility for oncoming users and are	<p>Please see Response #1.</p> <p>A CIU was considered and denied for Camel Rock and Secret Trails. Please see the MDSP CIU Summary available at www.parks.ca.gov/mdsp-rtmp for more information. A CIU can be requested for Castle Rock and Sunset trails through the CIU Process outlined on the Department’s website.</p>

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	winding and narrow such that bike speeds will be slow in either direction.	
134.	I recommend you consider opening Secret Trail to bikes to provide a loop between Wall Point Road and Barbeque Terrace Road.	The CIU evaluation team determined that the modifications necessary to make the Secret Trail useable by bicycles would alter the trail to the point that it is no longer the same trail. Please see the MDSP CIU Summary available at www.parks.ca.gov/mdsp-rtmp for more information.
135.	Oppose any conversion of single-track trails to bicycle use, including Wasserman Trail (MC #2) and Oak Knoll Trail (MC #7). Oak Knoll Trail has a bicycle-allowed road that parallels trail.	The addition of bicycle use along a portion of the Wasserman Trail will only be considered if a new trail connection is developed from Clayton Oaks Road to the Wasserman Trail. The request to add bicycles to Oak Knoll Trail was approved with modifications. Specifically, the CIU team determined "Overall the Oak Knoll Trail currently follows a sustainable alignment that could also sustain the proposed change-in-use with minimal modifications and cyclical maintenance. Only minor trail re-routes, trail reconstruction/re-engineering, and drainage crossing improvements would be required for sustainability. Sight distances are either adequate or could be improved with little effort. Adequate passing spaces either exist or could be provided through trail reconstruction and minor trail re-engineering. Modifications necessary for change-in-use would likely add sustainable design to this already moderately sustainable trail alignment and would thus reduce future maintenance costs."
136.	<u>Make Un-named trail parallel to Mitchell Canyon Road between Red Road and Black Point Trail multi-use.</u> Rationale: Provides safe way to by-pass the weekend congestion of the Mitchell Canyon Road.	We believe you are referring to the Globe Lily Trail. Please see Response #1.

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	<p>Justification: Fully meets minimum width requirements for Multi-use (The trail is a previous 4X4 trail width allowed to go back to single track. Most of it presently full width for multi-use). Effort required: Change the signs. Perhaps trim brush in a 10 yard section if perfection is required. No other actions required.</p>	
137.	<p><u>Make Coulter Pine Trial multi-use.</u> Rationale: Important connector between Mitchel staging area and Donner Canyon areas. Justification: Mostly meets minimum width requirements for Multi-use (Much of the tread is 4X4 trail width). Effort required: Some tread would require wider grading (perhaps 100 yards along the hillside).</p>	Please see Response #1.
138.	<p><u>Make Heatherington Loop Trail multi-use.</u> Rationale: Provides a more gentle and scenic climb to bypass steep and loose section of Donner Canyon road. Reasoning: Mostly meets minimum width requirements for Multi-use, mostly. (Much of the trail is a previous 4X4 trail width allowed to go back to single track). Effort required: Some tread would require wider grading (perhaps 50 yards along the hillside above the creek).</p>	Please see Response #1.

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139.	<p><u>Make Tickwood Trail multi-use.</u> Rationale: Important connector between Back Creek and Donner Canyon areas. Provides a desirable workout loop. Justification: Mostly meets minimum width requirements for Multi-use. Effort required: Some tread would require wider grading (perhaps 50 yards along the hillside above Back Creek).</p>	Please see Response #1.
140.	<p><u>Make Trail beside the Mitchell staging area parking lot (up behind restrooms on East side) multi-use;</u> Rationale: Provides safe way to by-pass the weekend congestion of the parking lot area where cars, etc. Justification: Fully meets minimum width requirements for Multi-use (The trail is a previous 4X4 trail width allowed to go back to single track. Most of it presently full width for multi-use). Effort required: Change the signs. Perhaps trim brush in a 10 yard section if perfection is required. No other actions required.</p>	Please see Response #1.
141.	<p>Open up additional trails as 'Bike' and 'bike and horse' trails including MC2, MC6, MC7, NG1, MT2, MT7</p>	<p>Draft Recommendations MC #2, MC #6, MC #7, NG #1, and MT #2 call for the development of multi-use trails or the addition of bicycles to existing trails. The trail use designations for MT #7, Jackass Canyon Trail and Oyster Point Trail Connection, will be considered at the time of project development.</p>

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142.	<p>Open the following trails to bikes:</p> <ul style="list-style-type: none"> -Tassajara -Mother's Trail -Jackass Canyon Trail -MT6 & MT8 -Juniper Trail -Madrone Canyon Trail (Trail - Through Time 3 & 4, West Fork Sycamore Creek) -Meridian Point Trail 	<p>Please see Response #1.</p> <ul style="list-style-type: none"> - Tassajara - A portion of Tassajara Creek Trail will be evaluated for CIU to add bicycles (see Draft Recommendation MT #6, Jackass Canyon Trail and Tassajara Creek Trail Connection). - Mothers Trail - Mothers Trail is currently designated for hike, bike, and horse use. - Juniper Trail - A portion of the Juniper Trail was recommended for the addition of bicycles (see Draft Recommendation MC #6, Portions of Juniper and Summit Trail). - A CIU for the other trails may be requested per the CIU Process described on the Department's website.
143.	<p>Solicit input from user groups such as equestrians and cyclists.</p>	<p>Please see Response #4.</p>
144.	<p>Solicit input from adjacent land owners.</p>	<p>Please see Response #4.</p>
145.	<p>Solicit input from local fire districts and Calfire as it pertains to the importance of roads and trails in firefighting and fire prevention. Include their input in the plan.</p>	<p>Please see Response #4.</p> <p>Calfire has provided input on the Draft RTMP.</p>
146.	<p>Use volunteers from the interpretive association, mountain bike clubs, and/or equestrian groups to help build and maintain trails.</p>	<p>Currently, nearly all trail maintenance and development work is completed by park volunteers. A parkwide recommendation has been added as follows: "Volunteers from organizations such as the Mount Diablo Interpretive Association, East Bay Trail Dogs, and Save Mount Diablo have been critical partners in the development and maintenance of the park's trails. Continue to work with these organizations to develop volunteer resources."</p>

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147.	<p>The RTMP would be enhanced by including a short description of the work of volunteers and volunteer groups, such as the Mount Diablo Interpretive Association and the East Bay Trail Dogs, recognizing their important contributions to the Park, and recommending their continued utilization across a wide range of Park activities.</p>	<p>Please see the response to Comment #146.</p>
148.	<p>While recreational equestrians and hikers residing in upper income Clayton are well served by the northern trails, the middle and lower income residents from the other nearby cities are not as well served because they do not have the excess annual income required for equestrian recreation. None of the northern trails are legally accessible by bicycle and there are no proposed changes to trail use designations in the Draft Plan to accommodate bicycle access to them. All of the trails that are legally accessible to bicycles are located south of the intersection of Prospector's Gap Road and North Peak Road. The northern trails that are already heavily used by bicyclists must be legally opened to bicyclists to bring equity to trail use at Mt Diablo State Park.</p>	<p>Please see Response #1.</p>