

Preface:

The General Plan as an Environmental Impact Report (EIR)

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P.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

P.1.1 COMBINED PLAN/EIR

The California Environmental Quality Act (CEQA) of 1970 establishes a requirement for state agencies to analyze and disclose the potential environmental effects of a proposed action. The familiar environmental impact report (EIR), prepared by state and local governments, is usually a freestanding document intended to meet the requirements of CEQA. However, CEQA also encourages options to avoid needless redundancy and duplication, such as combining General Plans and EIRs (CEQA Guidelines 15166) and the use of tiering, a process where a lead agency prepares a series of EIRs, progressing from general concerns to more site-specific evaluations with the preparation of each new document (CEQA Guidelines 15152). When the lead agency combines a General Plan and an EIR, all requirements of CEQA must be covered and the document must identify where the requirements are met. The following section provides a guide to the structure and contents of the General Plan/EIR, which meets the CEQA requirements.

As explained here, the General Plan/EIR in its whole constitutes the required content of an EIR, therefore this document refers to the “General Plan/EIR” to reinforce the concept of a single document fulfilling the dual requirements of park general planning and CEQA compliance.

P.1.2 TIERED CEQA ANALYSIS

The ABDSP General Plan/EIR serves as a first-tier Environmental Impact Report (EIR), as defined in §15166 of the California Environmental Quality Act (CEQA) Guidelines. Individual and/or site-specific projects and appropriate CEQA compliance will follow the General Plan/EIR. The analysis of broad potential environmental impacts discussed in the Environmental Analysis Section of this document will provide the basis for future second-level environmental review, which will provide more detailed information and analysis for site-specific developments and projects. These projects include management plans and facility development projects. Planning and feasibility studies for park management, recreation, and resource protection are ongoing and have occurred prior to the General Plan approval.

This General Plan/EIR provides discussion of the probable impacts of future development and established goals, policies, and objectives to implementing such development in a manner which will avoid or minimize such environmental impacts. This approach is consistent with a tiered approach to EIRs.

Where a proposed project covers a wide spectrum of action, from the adoption of a Plan, which is by definition tentative and subject to further refinement, to activities with a site-specific impact, CEQA requires that “environmental impact reports shall be tiered whenever feasible[.]” (Public Resources Code sec. 21093(b).) Tiering is defined as “the coverage of general matters and environmental effects in an environmental impact report prepared for a

policy, plan, program, or ordinance followed by narrower or site-specific environmental impact reports...” (PRC sec. 21068.5; CEQA Guidelines sec. 15385.) While a tiered EIR may not defer all consideration of impacts to a point in the future, it can legitimately indicate that more detailed studies and project-specific impacts may be considered in future environmental documents. Generally, the courts have recognized that environmental studies at the general plan level will be general. It has been found to be acceptable to consider more detailed analysis later in the process, which will be measured against specific performance criteria, formulated at the time of Plan approval.

The level of detail addressed in the Environmental Analysis section is comparable to the level of detail provided in the land use proposals of the Plan. Tables 5.7 and 5.8 of the Environmental Analysis section provide quantitative data relative to the land use proposals in the rest of the General Plan. What is critical, and what is set forth in the Plan, is the formulation and eventual adoption of a set of policies designed to minimize and mitigate impacts that might occur from the implementation of projects under the General Plan.

For example, the Plan designates Park property into land classifications, such as state wilderness, natural preserves, and cultural preserves and additional management zones. Goals and policies are proposed for adoption for each of these zones which provide conceptual parameters for future management actions. The Plan specifically envisions that a series of focused management plans (Cultural Resources, Natural Resources, Camping, Roads, Trails, Interpretive, and Facility) will be prepared subsequent to adoption of the General Plan. These management plans will propose the activities to be carried out, and will require CEQA compliance and public review as part of their approval.

P.1.3 STRUCTURE AND CONTENTS OF THE GENERAL PLAN/EIR

This project is prepared in accordance with CEQA Guidelines (Title 14, California Code of Regulations), Article 9. Contents of EIR §15120(c) states that Draft EIRs shall contain the information required by Sections 15122 through 15131. The following table shows where the required items are found in this General Plan/EIR.

Table P.1—Location of EIR Required Content

CEQA Guidelines Content	Location in ABDSP General Plan/EIR
15122 Table of Contents or Index	Beginning of this document.
15123 Summary	Follows the <i>Table of Contents</i>
15124 Project Description	Ch. 3 <i>The Plan</i> (description) Sec. 4.2 Project Description (summarized) Ch. 1 <i>Introduction</i> (information about project objective & general plan process)

15125 Environmental Setting	Ch. 2 <i>Existing Conditions</i> Sec. 4.3 <i>Environmental Setting.</i>
15126 Consideration & Discussion of Environmental Impacts	Ch. 4 <i>Environmental Analysis</i>
(a) Significant Environmental Effects of the Proposed Project.	Sec. 4.5.3 Significant Effect & Proposed Mitigation.
(b) Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented.	Sec. 4.5.2 Unavoidable & Irreversible Significant Environmental Effects.
(c) Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Project Should it be Implemented.	Sec. 4.5.2 Unavoidable & Irreversible Significant Environmental Effects.
(d) Growth-Inducing Impact of the Proposed Project.	Sec. 4.5.5
(e) The Mitigation Measures Proposed to Minimize the Significant Effects.	Ch. 3 <i>The Plan</i> , Sec. 3.3 <i>Goals and Guidelines</i> (intended to minimize adverse environmental effects) Sec. 4.4.5.3 Discussion of Guidelines as mitigation for subsequent action.
(f) Alternatives to the Proposed Project.	Sec. 4.4 <i>Plan Alternatives</i> Table 5.7 “Alternatives Matrix—Proposed Uses & Environmental Impacts”
15127 Limitations on Discussion of Environmental Impact	Sec. 4.5.2 (discussion - irreversible changes)
15128 Effects Not Found to be Significant	Sec. 4.5.4 Effects found not to be significant Appendix A (attaches the Initial Study)
15129 Organizations and Persons Consulted	Ch. 5 <i>References</i> Sec. 5.3 Organizations & Persons Consulted Sec. 5.4 Report Preparer
15130 Discussion of Cumulative Impacts	Sec. 4.5.6
15131 Economic and Social Effects (optional topic)	Ch. 3 <i>The Plan</i> Throughout the document under discussions of recreation & visitor experience

P.1.4 USES OF THIS GENERAL PLAN/EIR

The General Plan/EIR has been prepared by the California Department of Parks and Recreation, Park Acquisition and Development Division, Southern Service Center. The California State Park and Recreation Commission has approval authority for all State Park General Plan/EIRs. The Commission determines whether or not to:

1. Accept the certified General Plan/EIR as a “Final EIR” under CEQA Guidelines §15166.
2. Adopt the General Plan/EIR as a general plan under PRC 5002.2.
3. Designate the proposed State Wilderness under PRC 5019.50 and 5019.68.
4. Designate the proposed Cultural Preserve under PRC 5019.5 and 5019.74.

The ABDSP General Plan is the guiding policy document for subsequent operation and management of the Park. The Plan utilizes six management zones within the Park. These zones are described in detail in §3.2.4 of the ABDSP General Plan/EIR. Additionally, the Plan specifically envisions that a series of seven focused management plans (Cultural Resources, Natural Resources, Camping, Roads, Trails, Interpretive, and Facility) be prepared subsequent to adoption of the General Plan.

Some of the provisions of these focused management plans as well as development, maintenance, facility use, and recreational activities allowed by the General Plan have the potential to impact the environment. Prior to taking any further action, CSP must evaluate whether that action constitutes a “project” under CEQA, whether it is categorically exempt (for example routine maintenance), whether it may have a significant impact on the environment and if so, whether a negative declaration or an EIR needs to be prepared.

All future action by CSP will need to be found consistent with the adopted ABDSP General Plan. The Plan’s Management Zones along with the Goals and Guidelines, define the main approach to avoid and mitigate subsequent actions and the General Plan/EIR establishes the baseline for future environmental review as a first tier program EIR.

Included in the General Plan is the proposed sub-unit classification change of land classified as State Park to 55,797 acres of State Wilderness and approximately 2,600 acres of Cultural Preserve. The sub-unit classification change would conform to the proposed Management Zones in the General Plan. The designation of the State Wilderness and Cultural Preserve may be made with no further environmental review than that provided by this General Plan/EIR.

P.1.5 ENVIRONMENTAL REVIEW PROCESS AND RECIRCULATION

The General Plan/EIR addresses the entire area and operation of the Park; hence, it is broad and comprehensive in scope. A series of meetings and a formal public process were used to determine the Plan and the content of the environmental analysis.

An Initial Study and a Notice of Preparation (NOP) was circulated to state agencies, local city, and county planning offices, interested public organizations and interested individuals. (See Appendix)

CSP conducted extensive public involvement during the planning process. (See §2.3.5.)

The Preliminary General Plan/Draft EIR containing the environmental assessment was published January 17, 2003 (see Notice of Availability in the Appendix). After the public comment closed in March 2003; CSP staff prepared responses to comments and proposed text changes for the Preliminary General Plan/Final EIR. The comment letters, CSP responses, and the proposed text changes were published as part of the Preliminary General Plan/Final EIR on the CSP website in November 2003

This document has been revised and recirculated in order to: 1) clearly explain how the Preliminary General Plan/EIR complies with CEQA; 2) update the document to address recent significant acquisitions (Vallecito Ranch and Mason Valley); and 3) to integrate the proposed text changes and the substantive material from the responses to comment, with the January 2003 Preliminary General Plan/EIR. Grey highlighting identifies these revisions. This document has been recirculated as the ***July 2004 Preliminary General Plan/Draft EIR*** with the full 45-day public review period