

Topanga State Park Preliminary General Plan/
Draft Environmental Impact Report

Public Comments & Responses

2012



SCH# 2010031111

Edmund G. Brown Jr.
Governor

John Laird
Secretary for Natural Resources

Janelle Beland
Director of Parks and Recreation

State of California
The Resources Agency
Department of Parks and Recreation
P.O. Box 942896
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APPENDIX J – DEIR PUBLIC COMMENTS AND RESPONSES

The Preliminary General Plan/Draft EIR (GP/EIR) for Topanga State Park was released in accordance with CEQA Guidelines §15087 for a 45-day public review period on December 8, 2012. The public review period ended January 23, 2012. This appendix provides comment letters received during the review period and responses to each. A total of 14 comment letters were received.

Commenters

1. Concerned Off-Road Bicyclists Association
2. International Mountain Bicycling Association
3. Malibu Feed Bin and Wachter Hay & Grain
4. Glen Gerson
5. Lynn & Bruce Dickhoff e-mail #1
6. Lynn & Bruce Dickhoff e-mail #2
7. Makan Delrahim
8. Native American Heritage Commission
9. National Oceanic and Atmospheric Administration-National Marine Fisheries Service
10. Resource Conservation District of the Santa Monica Mountains
11. Topanga Canyon Docents
12. Los Angeles County Department of Beaches and Harbors
13. Los Angeles County Department of Beaches and Harbors Follow-up Letter
14. Joe Pavesic



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February 23, 2012

Luke Serna, Environmental Coordinator
Topanga General Plan Team
California State Parks
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Re.: Topanga State Park General Plan

Dear Mr. Serna,

1-1 Thank you for the opportunity to comment on the Topanga State Park General Plan. We have been involved in the process from the first public hearings, and are happy to see the plan approach its final iterations. We congratulate you and the staff for moving the plan forward. However, as CORBA represents off-road cyclists, there are a few items and omissions in the current draft about which we have some concerns.

1-2 1. We read on page 49 “Eight additional focus group meetings were held to better understand a few site specific issues.” Then number 5 on page 50 mentions a focus group on user conflicts. CORBA as an organization representing off-road cyclists was not made aware of, and did not attend any such focus group. Nor did any of our members or anyone we can find in the bicycling community. There aren’t any details of who called the group or how that group’s findings may have affected the final plan. Without cyclists present, we are concerned that an unbalanced representation of user conflicts may have been made. Exclusion of one user group from such a focus group cannot possibly foster multi-use principles, just as excluding a user group from a trail furthers and deepens user conflicts when they do occur. Please document and clarify the process used to form this focus group and its findings as they pertain to the general plan. This would perhaps be suitable for inclusion as an appendix.

1-3 2. On page 65, it states “1. a. This management plan will address the ability of bikes, horses and other pack animals, and fire, construction and Park vehicles to carry and spread exotic plant seed throughout the Park.” There is no mention of hiking boots, running shoes, shoe tread, socks or clothes as a vector for the spread of exotic seed. This should also be of concern and should be addressed, especially since hikers are much more likely than cyclists to go off-trail where they can be exposed to more seed than would otherwise be encountered by those staying on the trail. We feel this is an omission.

1-4 3. Page 53 states that “trail-use designations are not part of this plan.... However, trail corridors, as well as trail goals and guidelines, will be established as a part of this process.” While these “trail corridors”

1-4
cont.

appear in the legend of the map on page 105, the scale of the map and the visual indicators used in the legend do not allow for the easy identification of or distinction between “corridors” and existing trails. A verbal description of each trail corridor proposed and/or a larger scale map would do much to alleviate and prevent any confusion. We feel we cannot adequately comment on the proposed trail corridors without fully understanding them.

1-5

4. In Table 3, “Planning Matrix” on page 113, the Lagoon, Watershed Zone and Lower Topanga zones are listed as being restricted to “hiking on designated trails only.” To list an entire zone off-limits to other user groups will hamper the efforts to complete the Coastal Slope trail as it is envisioned--a multi-use long distance trail--that will pass through that zone. The Coastal Slope trail itself appears on the Lower Topanga/Lagoon Preferred Plan “Range of possible features” on page 115. Making trail use decisions on a trail-by-trail basis, rather than a blanket closure of an entire area, will allow for better management of users in the area, and reduce impediments to the planned Coastal Slope Trail.

1-6

5. According to the plan Musch Campground is open to bicycles. However, the Musch Trail is currently closed to bicycle use. A formal change-in-use request has been submitted to convert that trail to multi-use including bicycles. How is Musch Campground currently accessed by bicycles?

1-7

Off-road cycling is a healthy outdoor recreational activity that entices people away from their couches and computers and into our treasured open spaces. Cyclists comprise a large portion of State Park visitors, yet only fire roads and Rogers Road are currently open to bikes in Topanga SP, concentrating bicycles on fewer trails, and placing them on wide fire roads that encourage high rates of downhill speed. This contributes to user conflicts and creates further divisiveness between user groups. We would like to see the General Plan recognize cycling as a legitimate, welcomed and, when managed appropriately, sustainable activity in Topanga State Park.

CORBA has a long history with State Parks in the Santa Monica Mountains. Our trail crew volunteers have worked on Rogers Road and many other trails in neighboring State Park units for many years. We note in the plan that there is a recommendation to continue to work with volunteer and non-profit groups. We work side-by-side with other user groups at State Trails Day and other events. CORBA works constantly to educate, inform and encourage off-road cyclists to practice good trail etiquette, and the vast majority do. We look forward to continuing and furthering our relationship with Topanga State Park and other SP units in the Santa Monica Mountains.

Thank you,



Steve Messer,
Vice President
Concerned Off-Road Bicyclists Association

1. CORBA

- 1-1 Thank you for your appreciation of CDPR nearing the adoption of a new General Plan for Topanga State Park.
- 1-2 Meetings regarding the Topanga State Park Trail Management Plan have been conducted on a quarterly basis with CORBA and CSP since October 2010. The findings of these meetings were used in preparing the goals and guidelines of the GP/EIR. Additionally, CDPR has met with CORBA and IMBA since the Draft EIR was circulated to clarify concerns regarding the GP/EIR.
- 1-3 Thank you for the additional information regarding the additional vectors for the spread of exotic seed. The spread of exotic seed via hikers has been included on p. 65.
- 1-4 We've established a trail corridor as:

An existing trail or a conceptual trail route that is being illustrated to denote the need to connect two points of interest or management zones. Simply put, a circulation route is required to connect point 'A' to 'B', but until the exact trail route is determine via additional analysis of such elements as topography and natural/cultural resources, a simple line is conceptually drawn on the plan.

Further distinction of the alignment of future trail corridors was determined to be better established during the planning process of the Topanga State Park Trail Management Plan.
- 1-5 No determinations as to the specific trail-use for trail corridors have been made within the GP/EIR. These determination shall be made in the future Topanga State Park Trail Management Plan in order to allow for a focused discussion and determination of specific trail uses for new trail corridors.

On p. 113, 'Hiking on designated trails' which is currently denoted in the Planning Matrix under the Lower Topanga Zone, Watershed Conservation Zone and Lagoon Zone shall be revised to 'Trail-use designation to be determined'.

On p. 92, under the Lower Topanga and Lagoon Zone goal/guidelines section, the following text shall be added for clarification:

The Lower Topanga Zone visitor experience will be geared towards pedestrian use. During the final determination of trail-use designation for this zone; careful consideration shall be given to the proposed visitor experience based on the resources within this zone and the proposed lagoon/creek restoration.
- 1-6 Clarification was made regarding the ability to access the Musch Campground on bicycle after CDPR met with CORBA after the release of the Preliminary

GP/Draft EIR. There is currently bike access to Musch Camp via the paved service road from Hillside Drive.

- 1-7 Thank you for the additional information regarding the current mountain biking trends within Topanga State Park. We shall consider them as we continue to monitor and implement appropriate changes regarding trail use in Topanga State Park. We look forward to your continued involvement with Topanga State Park.

To: Luke Serna, Park and Recreation Specialist
8885 Rio San Diego, Suite 270
San Diego, CA 92108

From: Jim Hasenauer, International Mountain Bicycling Association
4359 Pampas Road
Woodland Hills, Ca 91364

February 22, 2012

Re.: Topanga State Park General Plan

I have been following the planning process and have attended the various public planning workshops. First, let me commend you and the rest of staff for listening and integrating public comments about recreation into the draft plan. The plan has come a long way from the early public meetings. Topanga State Park is best known for its recreational value to residents of the west side and the San Fernando Valley.

It is generally a very well crafted document which will serve Topanga State Park well.

As a mountain bicyclist who rides in Topanga every week, I do have some significant concerns.

- 2-1 [1. On page 50, you claim that there was a focus group on user conflicts. I have spoken to mountain bikers who are members of CORBA, the Concerned Off Road Bicyclists Association, an IMBA Chapter and other IMBA members. So far, no mountain biker knows anything about this focus group. It is odd that such a group would be convened without mountain bike representation. There is no specific description of that group's composition nor their conclusions in the Plan.
I would like more details on the composition of that group, its conclusions, and the conclusions park staff drew on the basis of that group. I am of course worried that the extent and causes of user conflict may have been overstated. As you probably know, State Parks is undergoing a programmatic EIR on mountain bike trail use issues. User conflict is one of the areas being studied. The plan makes no mention of this, nor of the many national studies on trail user conflict. Most of them say that trail user conflict is a genuine experience of a few trail users who through multiple complaints create the perception of a large scale conflict. Trail user conflict is best managed through access, responsible use and education.
- 2-2 [2. On page 53 and p. 96 there is the statement that the plan would designate "trail corridors". I could find no such corridors actually identified in the plan.
- 2-3 [3. The plan indicates that in Lower Topanga, the Lagoon Area and the Watershed Zone trail use would be restricted to hiking only. I hope that appropriate trails in those areas might be open to responsible mountain bikers. The planned Coastal Slope Trail will pass through Lower Topanga. My understanding is that the Coastal Slope Trail is to be a

2-3
cont.

multiple use long distance trail. It is essential that a blanket zoning closure doesn't eliminate bicycle access from such a major trailhead. A better way of managing bicycle use in those zones is to say "Bicycles prohibited except where allowed" and then make trail use decisions on a trail by trail basis.

2-4

4. On page 44, the plan says the Musch Campground is open to bicycle use. I did not know that. The Musch Trail that passes through the campground currently prohibits bicycle use (although we have officially submitted a trail conversion request to State Parks). **Is the Musch campground currently open to bikes? How does a bicyclist get to it?**

2-5

Mountain bike use has been shown to have the same kind of environmental impacts as hikers' and less than that of equestrians. All users have an impact and all users should practice responsible trail use. Bicyclists can share the trails with other park users.

2-6

As you know, mountain bike use has a long history in the park and mountain bikers make up a large percentage of trail users. Currently we are limited to fire roads and to the Rogers Road section of the Backbone Trail. We understand that the General Plan is not the place to call for more access, but the General Plan does establish a context for future more specific decisions. Because of that we would like to see the above items clarified and language inserted in the General Plan that welcomes responsible mountain bike use and recognizes it as legitimate, safe, sustainable and manageable.

Thank you.

2. IMBA

- 2-1 Both CORBA and California State Parks (CSP) have been meeting on a quarterly basis to discuss issues including user conflict since October of 2010.

As a result of these meetings, the General Plan Team designated trail corridors and determined that more specific trail-use designation shall be made in the forthcoming Topanga State Park Trail Management Plan.

We have used several resources including those you mention to better understand the user conflicts that occur on trails. Conclusions that have been drawn from ongoing studies including the California Recreational Trails Plan shall be considered in designating trail uses within Topanga State Park.

Trail use conflicts can currently be minimized through the trails goals/guidelines found on pp. 95-97 of the GP/EIR.

- 2-2 A new trail corridor being introduced as part of the (GP/EIR) will be a connection from Pacific Coast Highway to Vista Marquez (formerly known as Parker Mesa), which can be seen on the Figure 6 Map, Topanga State Park Preferred Plan, page 105.
- 2-3 Specific trail-use designations will not be made at this time. These decisions shall be made within the future Topanga State Park Trail Management Plan. See response to comment 1-5 above for additional details.
- 2-4 Clarification was made regarding the ability to access the Musch Campground on bicycle after CDPR met with CORBA after the release of the Preliminary GP/Draft EIR. There is bike access to Musch Camp via the paved service road from Hillside Drive.
- 2-5 CDPR agrees that mountain bikers can have a relatively similar impact to park resources as hikers. Through enforcement, signage and incorporation of the goals and guidelines set forth within the GP/EIR found on pages 95-97 we can continue to support bicyclists sharing trails with other park users.
- 2-6 Thank you for your suggestions. We will consider them as progress continues with the management of Topanga State Park. The General Plan team is cognizant of the value of providing mountain biking trails to Topanga State Park and will continue to support responsible mountain bike use in concert with the protection of the many resources within Topanga State Park.

Morehart Mercantile Corp.
Malibu Feed Bin and Wachter Hay & Grain
P.O. Box 231
Santa Paula, CA 93061
805-525-5692

3. Malibu Feed Bin and
Wachter Hay & Grain
Marty & Patricia Morehart

January 19, 2012

TO: Luke Serna, Environmental Coordinator, Topanga General Plan Team, California State Parks, Southern Service Center

FROM: Martin S. Morehart, Malibu Feed Bin, Morehart Mercantile Corp

Dear Mr. Serna,

This is our letter to be included in "the comments".

The following is a list of contributions our store has made to the surrounding community:

1. Served as a drop off location for students attending various schools throughout the surrounding area, as well as those attending local summer camps. On a daily basis, students ask to use one of our phones to locate a parent, in order to coordinate their transportation home.
2. Topanga Canyon Blvd., being a two lane road, regularly has accidents, blocking the road for several hours at a time. Students make contact with their parents and loved ones using one of our telephones.
3. Our store and our telephone lines have been used on numerous occasions as a Fire Department Command Center during the Malibu and Topanga fires.
4. We host animal evacuation during emergencies and disasters.
5. We paid \$87,747.00 in sales tax during 2011.
6. We paid \$208,211.00 in payroll during 2011.
7. We paid \$41,104.00 in rent to the State of California Parks in 2011.
8. We provided support in the form of gift certificates and donations to schools, service clubs and churches located in Malibu and Topanga.
9. Our inventory product mix caters to gentleman ranchers and backyard retreats. The product mix consists of animal feed, pet

3-1

supplies, farm supplies, backyard poultry, etc. which require low cost on-site storage. We have survived because of our unique position.

10. We conduct regular classes in backyard animal husbandry.

11. We are the original sponsor and remain as primary sponsor of the 32 year old "Shrimp Show". This is an annual event that is only open to children, and it draws people from miles away.

12. Our horse product mix is dedicated to beginning riders, with a special emphasis on children.

13. Our inventory also includes sundries and other products to make the beach visitor and hiker's experience more enjoyable.

14. Since buying the Malibu Feed Bin in 1966, we have worked hard to preserve the early 20th century building architecture.

3-1
cont.

Our family has strong foundational roots in the park. The owner of the Malibu Feed Bin (Marty) lived in Rustic Canyon from 1952 to 1970. His father owned Josepho Barn where they kept horses and cattle on the Josepho Ranch. An early part of the Malibu Feed Bin was providing feed for the polo ponies, and Marty even took polo lessons from Duke Coulter and went on trail rides with several of Will Rogers' children.

Because of growing up in and around Will Rogers, we have a profound appreciation of the rural history of the park.

In your plans to create the experience of early 20th century architecture, please do not overlook the nostalgia that exists with third and fourth generations of Malibu Feed Bin customers who return with their young ones to share their memories of a rural lifestyle they experienced growing up.

Marty and Patricia Morehart

3. Malibu Feed Bin

- 3-1. The General Planning Team would like to acknowledge the contributions that the Malibu Feed Bin has made to the surrounding community. Your comments shall be part of our record and considered in future planning for Topanga State Park.

Southern Service Center
8885 Rio San Diego Drive
Suite 270
San Diego, Ca 92108
ATT:
Luke Serna

1/20/2012



Topanga General Plan

I feel it is important that your general plan, (which is to last for the next 20 years) allows for the park to capture revenue opportunities.

- 4-1

The state is broke and your Department is closing down parks. I am concerned that this plan is limiting the opportunity by demolishing the Topanga Motel and only adding in minimal day use parking lots.

I understand your plan calls out for a study to determine the historic significance of these structures and the outcome may be; mothball, refurbish into interpretive structures or demolish completely.

Where are you going to find the funds to build day use lots create interpretive structures and provide staffing for new educational programs?
- 4-2

If you allow for an overnight use as stated on page 91, you could provide overnight lodging opportunities. Your Department has proven a successful lodging program at Crystal Cove. Our community would love to see alternative lodging in the Topanga/Malibu area. A portion of the funds earned from the lodging could assist in funding the new educational and interpretive programs; even provide money for staff.
- 4-3

I would also like to comment on the "gateway" to Topanga State Park on the corner of PCH and Topanga Canyon. Your goal is to "clean up this visual clutter" by taking out the existing facilities and making the corner "natural." Well it is unfortunate that your Department did not take the time to talk to the business owner on the opposite side of Topanga Canyon blvd. The owners, British Petroleum are planning on re-opening the gas station, and work is to begin in the next six months.
- 4-4

In addition, it would be detrimental to lose the Feed Bin, and adjacent business. Their operations are tied to the Malibu and Topanga community. Not only can they provide real income from minimum rent against a percentage of sales, during storms, fires and other Topanga Canyon closures, this business is the hub for families to meet. They also provide the community Christmas trees and pumpkins and hold several fundraising programs for the local children. There's a lot of community history there.

Thanks

Glen Gerson
310-308-6235

4. Glen Gerson

- 4-1. Concession and revenue generation opportunities are denoted in the GP/EIR including those within the Lower Topanga and Lagoon Zones found on p. 91 as well as additional opportunities outlined on p. 101-102. These concession opportunities as well as CDPR's Major and Minor Capital Outlay Programs are additional funding sources for future park improvements.
- 4-2. Thank you for your support of overnight lodging as an activity for visitors to Topanga State Park.
- 4-3. CSP may acquire property from a willing seller when funding is available. We were aware of the re-opening of the gas station on the corner of Topanga Canyon Boulevard and Pacific Coast Highway.
- 4-4. Thank you for the input regarding the Feed Bin and adjacent businesses. This information shall be noted and referred to in future planning.

From: Lynn & Bruce Dickhoff
Sent: Thursday, December 08, 2011 3:45 PM
To: Environmental Review
Subject: Topanga State Park

Dear Mr. Serna,

5-1

I have just finished reading through the very impressive Topanga State Park General Plan. The thoughtful in depth study thoroughly covers the many topics affecting the area. It reflects the countless hours of research and observations by the parties involved. In an ideal world funding would be made available to carry out the various plans. Hopefully small portions of the plan can be carried out at a time.

5-2

I noticed two spelling errors that need to be corrected. On page 33 "gentleman" is misspelled near the bottom of the paragraph entitled Gentlemen Ranchers Period. On page 34, "Cheny" Fire Road is incorrect. It is named after the Cheney family. Please also correct Columbus and Lucy Cheny, to read Cheney. Cheney Fire Road is correctly spelled on page 174.

5-3

I was curious about the statement on page 38 saying that the rangers do roving interpretation. As an almost daily visitor to Trippet Ranch I infrequently see rangers, and they are always in their vehicles. Perhaps when funding is restored to the State Parks the rangers can actually have time and energy to interact with the visitors to educate them.

Congratulations on a well done document. I am looking forward to seeing the the many planned improvements to the park.

Sincerely,

Lynn Dickhoff
Topanga

5. Lynn and Bruce Dickhoff e-mail #1

- 5-1. Thank you again for your appreciation of the time and effort we've put into the GP/EIR. We too are excited to begin the ambitious plans we've outlined in the plan.
- 5-2. The Final GP/EIR has been changed to correct the spelling errors that you found.
- 5-3. Rangers may currently be limited in their ability to conduct roving interpretation due to budget restrictions requiring them to attend to other tasks, but we understand this is a vital role they provide that will be increased once park funding can be restored.

From: Lynn & Bruce Dickhoff
Sent: Monday, December 12, 2011 11:56 AM
To: Environmental Review
Subject:Re: Topanga State Park

Hello, How nice to hear from you.

6-1

When your team is compiling information about past residents in Topanga State Park, you might want to include some information about my maternal grandfather, T.W. Kneen. He built and ran a small resort at 772 N. Topanga Canyon Blvd., Topanga in 1918 - perhaps to the 1930's. (I grew up there. The property was sold after the 1993 Northridge earthquake which caused structural damage.) He was a stone mason and constructed the basalt rock walls at Trippet Ranch and the beautiful stone arch on Entrada Rd before arriving at the park entrance.

Are your historians using The Topanga Story, edited by Louise Armstrong York? It was published in 1992. A new edition will be out in the next few months. There are multiple entries about the Kneen family plus my parents, Lee and Katherine Haines, and then my generation. We all have enjoyed (and still do) hiking at Trippet Ranch before and after it was made into a state park.

Regards.

Lynn Dickhoff

6. Lynne and Bruce Dickhoff e-mail #2

- 6-1. Thank you for the additional information regarding the history of Topanga State Park. Our historian is familiar with the sources that you cited and made use of them in his documentation of the Park's history within the GP/EIR. The information that you shared with us shall be considered in the interpretation of Trippet Ranch.

FAX COVER SHEET

TO	Luke Serna
COMPANY	Topanga General Plan Team
FAX NUMBER	16192205400
FROM	Ben Eisner
DATE	2012-01-24 01:12:28 GMT
RE	Comments re/Lower Topanga DEIR

COVER MESSAGE

Luke, this has also been emailed.

January 23, 2012

Reference: Public Comments relating to Lower Topanga Draft General Plan and DEIR

Following are several short suggestions for public use and benefit of the Lower Topanga Park developed. I am a local resident living a few miles North of the area, an occasional admirer of the hiking trails and and a patron of several of the restaurants on the subject site.

I can be contacted at
MakanDelrahim@yahoo.com
should you need to reach me.

Sincerely,

Makan Delrahim
21370 Rambla Vista
Malibu, CA 90265

*Lower Topanga as a Natural Gateway to the
Outdoors Beauty that Topanga Park Offers*

*Since it is central to all of Southern California, establishing Lower Topanga as park
"entrance" to feature beauty of mountains and ocean meeting,
which is part of 10,000+ year history.*

The current Draft General plan calls for certain day use facilities to be allowed North of the creek, but to allow the front area, at corner of PCH and Topanga, which houses the former Topanga Ranch Motel structures to remain dilapidated and unused.

7-1 [*I would think the public would benefit immensely by a few additional modifications to the current plan. For example, the front area of the site that sits on PCH should become an educational and day use gateway for the public. it would both benefit the public by allowing more to enjoy the park, and also perhaps generate revenues for the maintenance and enhancement of the park and its trails particularly in the current budget realities the State of California is facing.*

7-2 [*An information "booth" could be incorporated prominently on the property and with educational information about the history of the public area. The information "booth" could be a designed to represent the appropriate Native American history of the site, the, **Tongyva** and **Chumash** tribes. Information could be provided via electronic and paper means. This will give visitors information on both the history and also specifics of trails, such as trail maps, picnic sites and directions to points of interest, anywhere from the mountains to the ocean.*

Moreover, the plan should allow for a road or accessible trail that connects the lower level picnic area, for picnics and possibly even musical events such as festivals in a natural amphitheater type setting.

As part of the educational components of the lower Topanga area, perhaps a few public exhibits could be allowed to display historical photos.

7-3 [*The current dilapidated buildings of the former Topanga ranch motel should be removed, as they are unsightly and day-use visitor cabins be allowed for visitors to appreciate the area and the ocean. This could generate revenues for the park but also provide a real public service by expanding to many more possible visitors, affordable accommodations to enjoy the outdoors and what the park has to offer.*

7. Makan Delrahim

- 7-1. At the intersection of Pacific Coast Highway and Topanga Canyon Boulevard, the uses you describe are currently planned for this zone of the park including a day-use outdoor classroom as well as a gateway into the Park. Please see p. 91-93, 110 for additional detail regarding the goals, guidelines and intended uses of the Lower Topanga Zone.
- 7-2. Please refer to the Goals and Guidelines for the Interpretation of Topanga State Park within the GP/EIR beginning on page 83. The programs to be offered shall include several means of providing educational opportunity to visitors to the park. More specific objectives, strategies, tasks and timelines shall also be determined through the preparation of an Interpretation Master Plan for Topanga State Park. Your input is appreciated in the planning of additional interpretive opportunities at Topanga State Park.
- 7-3. As an area specific guideline for the Lower Topanga and Lagoon Zones found on page 91 of the GP/EIR, it is stated that CSP shall “Explore the adaptive re-use of the existing historic motel structures as overnight lodging and relocate to the west side of the lagoon. If unfeasible, explore other non-traditional overnight use such as cabins or yurts.”

NATIVE AMERICAN HERITAGE COMMISSION

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December 9, 2011

Mr. Luke Serna

California Department of parks and Recreation

8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Re: SCH#2010031111; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "Topanga State Park General Plan / EIR Project" located mostly in the City of Los Angeles; Los Angeles County, California

Dear Mr. Serna:

The Native American Heritage Commission (NAHC) is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604). The court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites. The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect.

The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were identified** within the project area identified (e.g. 11,525-acre park). Also, the absence of archaeological resources does not preclude their existence. . California Public Resources Code §§5097.94 (a) and 5097.96 authorize the NAHC to establish a Sacred Land Inventory to record Native American sacred sites and burial sites. These records are exempt from the provisions of the California Public Records Act pursuant to. California Government Code §6254 (r). The purpose of this code is to protect such sites from vandalism, theft and destruction. The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a)

and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

8-1

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Special reference is made to the *Tribal Consultation* requirements of the California 2006 Senate Bill 1059: enabling legislation to the federal Energy Policy Act of 2005 (P.L. 109-58), mandates consultation with Native American tribes (both federally recognized and non federally recognized) where electrically transmission lines are proposed. This is codified in the California Public Resources Code, Chapter 4.3 and §25330 to Division 15.

Furthermore, pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

8-2

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

8-3

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

8-4

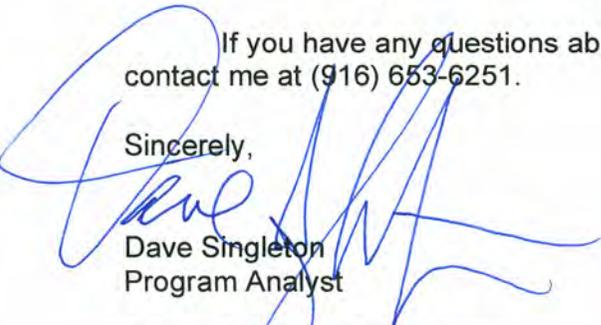
Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

8-5

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

8. NAHC

- 8-1. Two consultation meetings were held with Native American representatives prior to completion of the Draft GP/EIR in order to inform representatives of the plans for Topanga State Park as well as receive recommendations on the plan and how to proceed forward while avoiding and minimizing impact to archaeological and sacred sites. The NAHC was contacted in order to provide a list of interested Native American groups and individuals. These groups and individuals were contacted numerous times throughout the general planning process and correspondence with them included pertinent information regarding Topanga State Park and the general planning process. CDPR consulted with the Ventureño and Barbareño Chumash and Gabrieleno/Tongva tribes. CDPR met with members of the Santa Ynez Band of the Chumash Indians, the Ventureño Chumash and the Gabrieleno/Tongva.
- 8-2. Consultation was performed in compliance with all applicable policies and/or laws. Although CSP is not subject to federal laws in this general planning process, consultation was conducted in a similar manner as federal law requires.
- 8-3. CSP shall adhere to all state and federal requirements pertaining to the confidentiality of historic properties of religious and cultural significance.
- 8-4. Once construction does commence on elements within the GP/EIR, provisions for accidentally discovered archaeological resources shall be followed. A list of avoidance, minimization and/or mitigation measures has been prepared to avoid significant impacts to archaeological resources and include a plan of action in the event that unexpected cultural remains are uncovered during any project activities.
- 8-5. CSP will continue consultation with the Native American community including correspondence, meetings and informal involvement in order to ensure the protection of cultural resources within Topanga State Park.


UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE
 Southwest Region
 501 West Ocean Boulevard, Suite 4200
 Long Beach, California 90802-4213

JAN 23 2012

In response refer to:
 151422SWR2012PR00011:BMW-S



Mr. Luke Serna
 Topanga General Plan Team
 California State Parks
 Southern Service Center
 8885 Rio San Diego Drive, Suite 270
 San Diego, CA 92108

Dear Mr. Serna,

9-1

NOAA's National Marine Fisheries Service (NMFS) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Topanga State Park General Plan (TSPGP). NMFS is concerned with this project because some of the proposed management zones are within the range of the endangered Southern California Distinct Population Segment (DPS) of steelhead (*Oncorhynchus mykiss*) and include designated critical habitat for this species. Specific management zones and related activities that have the potential to impact steelhead and designated critical habitat include the Watershed Management Conservation Zone and the Lower Topanga and Lagoon Management Zones. Although the DEIR addresses impacts to steelhead and their habitat, the provided description does not adequately characterize the status of steelhead or likely impacts on steelhead from proposed infrastructure including parking lots and operation/residence facilities for park staff. In this regard, NMFS provides the following comments.

9-2

California Department of Parks and Recreation (CDPR) should reference the recently released Southern California Steelhead Recovery Plan (*Federal Register* 77(7): 1669 – 1670¹) and information contained therein to provide more detailed descriptions in the DEIR on the status of endangered steelhead in southern California and threats to the species and its habitat.

9-3

Additionally, a conceptual model describing the factors affecting *O. mykiss* population dynamics in Topanga Creek has been recently presented (Bell *et al.* 2011²). Incorporating the information contained in these documents into the DEIR will assist CDPR in drafting an adequate and comprehensive Natural Resources section of Chapter 2 (Existing Conditions and Issues). To ensure consistency and accuracy in reporting the federal listing of endangered steelhead and its designated critical habitat, NMFS has provided suggested revisions and corrections for Appendix

¹ National Marine Fisheries Service (2012) *Endangered and Threatened Species*; Recovery Plan for the Southern California Steelhead Distinct Population Segment. *Federal Register* 77 (7): 1669-1670.

² Bell, E., R. Dagit, and F. Ligon (2011) Colonization and Persistence of a Southern California Steelhead (*Oncorhynchus mykiss*) Population. *Bull. Southern California Acad. Sci.* Vol. 110, No. 1: 1-16.



9-3 cont. C. The *General Habitat* column should be revised to include the complete geographical range where steelhead are listed as endangered as well as the designated critical habitat within Topanga State Park (referenced in the following table as “TSP”).

Recommended Revised Table (revisions are in *italics*):

Scientific Name	Common Name	Federal Status	State Status	CDFG Status	General Habitat and Population Range	ESU Critical Habitat within TSP	Micro Habitat
<i>Oncorhynchus mykiss irideus</i>	southern steelhead - southern California ESU (<i>rainbow trout and steelhead combined</i>)	<i>southern California steelhead</i>		SSC	<i>DPS includes all naturally spawned anadromous O. mykiss (steelhead) populations below natural and manmade impassable barriers in streams from Santa Maria River, San Luis Obispo, County, California, (inclusive) to the U-S-Mexico Border.</i>	<i>Topanga Creek (34.0397, -118.5831) upstream to endpoint: (34.0838, -118.5980) (NMFS 2005)⁴</i>	Southern steelhead likely has greater physiological tolerances to warmer water & more variable conditions.

9-4 With regard to the adequacy of the DEIR for informing an understanding of adverse effects of the proposed action on endangered steelhead and designated critical habitat for this species, NMFS recommends that the DEIR provide greater detail on (1) how any newly proposed facilities (i.e., parking lots, park operations, staff residences) would be expected to affect steelhead and its habitat through alterations of water quality and physical habitat characteristics and conditions (e.g., changes in turbidity, dissolved oxygen, and nitrate levels, sedimentation, organic toxin runoff and other non-point source pollution, in the short and long-term), and (2) the type and extent of mitigation that is proposed to address the expected effects. Although specific projects are not detailed in the DEIR, CDPR should reference relevant ecological literature and reports that address likely impacts to water quality from human development including impervious surfaces (e.g., Mallin *et al.* 2000⁵ and Liebeler *et al.* 2005⁶). This information would supplement the existing discussion that portions of Topanga Creek exceed the Total Maximum Daily Loads (TMDLs) for lead, and is a 303 (d) listed body of water under the Clean Water Act.

³ National Marine Fisheries Service (2006) *Endangered and threatened species: final listing determinations for 10 distinct population segments of west coast steelhead*. Federal Register 71 (3): 834-862.

⁴ National Marine Fisheries Service (2005) *Endangered and threatened species: designated critical habitat for seven evolutionarily significant units of Pacific salmon and steelhead in California*. Federal Register 70 (170): 52488-52586.

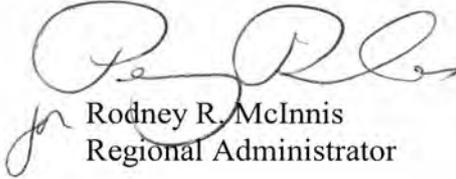
⁵ Mallin, M. A., K. E. Williams, E. C. Esham, and R. P. Lowe (2000) Effect of human development on bacteriological water quality on coastal watersheds. *Ecological Applications*. Vol. 10, No. 4: 1047 – 1056.

⁶ Liebeler, J. K., F. Federico, K. Damron-Hsiao, S. Given, and H. Williams (2005) *Improving Water Quality in the Santa Monica Bay and its Tributaries: A Long-term Outlook*. A project of the UCLA School of Law’s Frank G. Wells Environmental Law Clinic.

- 9-5 [Finally, NMFS recommends that the CDPR carefully consider the proximity of proposed parking and staff residence areas to designated critical habitat (i.e., coastal lagoon/estuary) when exploring alternatives to minimize adverse effects on the aquatic environment in general, and endangered steelhead and habitat for this species in particular. These structures, over a period of time, become vulnerable to changes in sea level rise and possible shifts in habitat spatial distribution as seen throughout estuarine habitat at the mouths of the Santa Clara River (Ventura County) and Arroyo Grande Creek (San Luis Obispo County), for example. As described for the Historic Zone, parking within the Lower Topanga and Lagoon Management Zones should be held to a minimum, and sustainable and permeable surfaces should be used to avoid creating negative impacts to steelhead and available steelhead habitat within these zones. Further analysis for the DEIR should include the future implications of these structures for natural resources, recognizing that over time these zone boundaries may shift due to natural shoreline processes (e.g., bank erosion near the mouth of the creek from wave action) and outcomes from variations in freshwater inflows (e.g., flooding during heavy storms). Under the stated goal⁷ for the Lower Topanga and Lagoon Zones, including an assessment of the anticipated amount, degree, and type of runoff into the intermittent lagoon⁸ habitat from any newly proposed structure within these zones would be appropriate.
- 9-6 [
- 9-7 [
- 9-8 [

NMFS appreciates this opportunity to review the DEIR for the proposed TSPGP. Please contact Brittany White-Struck at 562-432-3905 or via email at Brittany.White@noaa.gov if you have any questions concerning this letter, or if you require additional information.

Sincerely,



Rodney R. McInnis
Regional Administrator

cc: Roger Root, U.S. Fish and Wildlife Service
Jeff Humble, California Department of Fish and Game
Copy to File # 151422SWR2012PR00011

⁷ Restore, maintain and protect the lagoon/estuarine ecosystem and allow for scientific research as needed to reach these goals.

⁸ Lagoon system described as intermittent, forming behind a beach berm after seasonal rains.

9. NOAA-NMFS

- 9-1. CDPR is aware that impacts to steelhead and their habitat do need to be addressed. Further study will be conducted during the CEQA and/or NEPA process for projects that are guided by the GP/EIR. See the following comments for further discussion of some of the measures to be implemented and/or discussion of the status of steelhead.
- 9-2. A species account of the southern California steelhead is contained within Appendix G (Resource Inventories) to the GP/EIR. The recent publications, cited by the National Marine Fisheries Services (NMFS), have been incorporated into the account to provide a more accurate review of the steelhead.
- 9-3. In Appendix C, the status of the endangered steelhead has been updated per the recommendations of the NMFS. Reference to the species' designated critical habitat has been included in the Sensitive Wildlife Resources section of Chapter Two – Existing Conditions and Issues.
- 9-4. CDPR appreciates the literature/reports recommended by the NMFS regarding likely effects to water quality caused by human development. Such sources will be reviewed and considered in the assessment of potential impacts associated with specific, future projects. Each project will consider measures to individual projects that are proposed based on the GP/EIR, to avoid, minimize and/or mitigate possible disturbance to the steelhead and the species' habitat. All projects will include appropriate resource agency permits that will include measures to avoid and/or minimize impacts to water quality as required by measure **BR 13** on p. 144.
- 9-5. CDPR shall carefully consider the proximity of proposed facilities to coastal and creek habitat. Alternatives shall be considered that both protect resources in the Lower Topanga and Lagoon Zones as well as provide the needed services to Topanga State Park. A buffer to provide space between visitor facilities and the aforementioned zones shall be considered.
- 9-6. Parking will not be permitted within the Lagoon Zone. Parking provided within the Lower Topanga Zone shall be held to a minimum and permeable surfaces shall be used to minimize runoff of pollutants into nearby Topanga Creek. The GP/EIR has been modified to include this guideline.
- 9-7. CDPR will study the feasibility of structures near Topanga Creek to ensure that new structures will not be subject to flooding during heavy storms. As mentioned in response to Comment 9-3, impacts to the steelhead and the species' habitat will be analyzed during the environmental review for future projects proposed at Topanga State Park. Appropriate measures including those found within the Mitigation Monitoring Plan regarding water resources, erosion, water resources and biological resources shall be implemented.
- 9-8. Under the restoration/protection goal for the Lower Topanga and Lagoon Zones, the guideline pertaining to monitoring of the lagoon/estuary has been revised to

include an assessment of runoff from new construction. As stated on p. 92, CDPR shall periodically collect water quality data to monitor the health and function of the Lower Topanga and Lagoon Zones. Any measures provided by resource agencies shall be implemented into any new facilities that are proposed as indicated by mitigation measure **BR 13** found on p. 144.

BOARD OF DIRECTORS

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Barney Matsumoto
Southern Service Center
CA Department of Parks and Recreation
8885 Rio San Diego #270
San Diego, CA 92108

6 January 2012

Re: Topanga State Park Preliminary General Plan and Draft Environmental Impact Report

Dear Barney Matsumoto,

The RCD of the Santa Monica Mountains appreciates the opportunity to continue our participation in the evolution of the Topanga State Park General Plan. After careful review of the document, we would like to offer the following comments for your consideration.

Overall, this is a remarkable document, clearly written with a sensitivity and concern for the Park. We greatly appreciated the overall tone and effort to prioritize protection and enhancement of both the natural and cultural resources unique to Topanga.

We especially appreciate the stated goal to restore the Topanga Creek lagoon to a hydrologically functional and self-sustaining state. This is a unique opportunity to restore the lagoon and allow the creek to support the full suite of native species, protecting and enhancing its current status as the last remaining ecologically functional creek in the Santa Monica Bay. Restoring the lagoon, as well as achieving the additional goals for interpretive opportunities and protection of both cultural and historical resources is not mutually exclusive. Careful planning, using the hydrologic functionality as the starting point should enable development of an integrated multi-use opportunity that could be a model for adaptive reuse and forward thinking visitor-serving experiences.

We support the purpose identified by the plan, with the priority being on retaining the dynamic natural processes. Topanga State Park is truly one of a kind, and the one of the last frontiers for wildness within the City of Los Angeles. We need to actively seek ways to prevent “loving it to death”.

10-1

To that end, we would like to encourage expansion of the goals, guidelines and mitigations outlined for the Natural Resources section, to make it as least as comprehensive as those mapped out for the Cultural Resources section. Several of the

10-1 cont. | guidelines and mitigations identified in that section would also be applicable to guiding natural resources protection and enhancement.

10-2 | Within the Cultural Resources section, it might be worthwhile to identify Grandmother Oak as one of the sites of special cultural significance. The photo of children exploring her on page 81 is lovely. Adding additional education links, such as that proposed on pg 84, #3 to establish a PORTS program is a great idea. The RCDSMM would appreciate the opportunity to partner with State Parks to accomplish that task.

Area Specific Goals and Guidelines:

10-3 | The proposal to restore Trippet Ranch to its landscape of the 1940's should be carefully considered within the overall context of park ecology. While that was a defined historic moment, encouraging non-natives within the park sends a very mixed message. Perhaps the goal of interpreting that historic period could be accomplished via signage, rather than actual plantings. We support the continued use of the skeet lodge as a nature center and greatly appreciate the dedication and long-term support that facility has received from the Topanga Canyon Docents.

10-4 | We support the guidelines outlined for the Lower Topanga and Lagoon Zones, especially the optimization of creek and lagoon restoration. We look forward to working with State Parks and all other partners to make this dream a reality. While we concur that some overnight visitor serving opportunities might be possible, we hope that any such facilities will protect and enhance water quality at the lagoon and beach.

10-5 | After all the effort that went into restoring the former Rodeo Grounds Berm area, as well as the on-going Arundo eradication effort, we support the restriction of use for this area to passive recreation with limited or no facilities that would necessitate crossing the creek, unless of course, we are able to install a bridge for access and avoid impacts to the creek channel.

10-5 | We particularly appreciate guideline #1 in the Watershed Conservation Zone section that prioritizes the importance of the wildlife corridor provided by Topanga Creek, and its critical importance to endangered southern steelhead trout.

One of the identified emerging trends is the use of Topanga Creek by rock climbers. While this is generally a low impact activity, the presently developed sites in the "Twin Pools" area, known by climbers as the "Purple Rocks" is a concern. Not only is this a location for the sensitive Dudleya species, these pools are also important summer refugia for the trout. We support the proposal to work with these stakeholders to develop a strategy that provides access without causing damage.

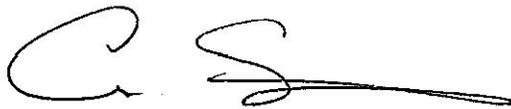
10-5
cont.

Reasonable Development Projection Matrix (Table 6):

We support the proposed development matrix for the Lagoon Zone, which is consistent with the goal of eventual restoration. We support the retention of visitor services, especially Wylie's Bait and Tackle, as it has been an integral part of the beach culture for many years. Given that the structure sits on a concrete slab, we suggest examining the opportunity for moving it to another location along Pacific Coast Highway and integrating it into the re-development of that gateway to the park. In general, the footprint of visitor-serving and administrative facilities, with its concentration west of the restored lagoon footprint is an approach we can support. We also note that some of the upland between the two areas of potential development shown in the preferred plan is suitable for such uses, and might also offer exceptional views of the coastline. Given that 75% of the existing development area is proposed to be relocated in new facilities, additional upland in this area may be need to be utilized as specific plans for both the lagoon restoration and visitor-serving elements are developed. The sustainable integration of multiple uses in this location will provide an exceptional opportunity to optimize resource conservation with the education of future conservationists, and the RCDSMM looks forward to working with State Parks to develop more detailed approaches

In summary, we support the overall vision outlined in the document and look forward to working with State Parks to implement some of the restoration goals.

Sincerely,



Clark Stevens
Executive Officer
and
Rosi Dagit, Senior Conservation Biologist

10. RCDSMM

- 10-1. As project specific plans are generated, further measures shall be developed and implemented to provide natural resource protection and enhancement within Topanga State Park.
- 10-2. We would appreciate you providing further information regarding “Grandmother Oak”. At this time, there is insufficient information to support recognizing the tree as a culturally significant resource.
- 10-3. Due to Trippet Ranch containing historically significant buildings and structures as well as man-made landscape features associated with the historical operational core, it is paramount that features including the landscape be restored to its period of historical significance from 1940-1963. Outside of this Historic Zone, the park shall continue to support the planting and protection of native vegetation.
- 10-4. We shall make efforts to ensure that we protect and enhance water quality within all of Topanga State Park while providing the opportunity for overnight visitor facilities.
- 10-5. We thank RCDSMM for their continued support of the GP/EIR and look forward to their continued cooperation and support as we proceed forward with its implementation.



Topanga
Canyon
Docents

21034 Hillside Drive
Topanga, CA 90290

T 310-455-1696

l.b.haigh@verizon.net

January 21, 2012

Luke Serna, Environmental Coordinator
Topanga General Plan Team
California State Parks
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108
enviro@parks.ca.gov

Dear Mr Serna,

The following comments on the *Preliminary General Plan/Draft Environmental Impact Report for Topanga State Park* are submitted to you by members of the Topanga Canyon Docents. The comments do not reflect the opinion of the organization as a whole, but are those of the members listed here: Lynne Haigh (President), Lucinda Mittleman (Vice-President), Karin Benson (Board), Harvey Bjornlie (Board), Mary Patton (Board) and Marc Birenbaum (Board).

We congratulate you on this plan. It is our opinion that California State Parks and the staff of the Southern Service Center have done an outstanding job of capturing the essence of Topanga State Park. This plan thoughtfully recognizes the immense value of Topanga State Park with its unique and significant environmental and recreational resources comprised of wildlands and open space in an urban area. The plan also shows careful consideration for preservation and interpretation of the historical and cultural assets of the park.

We also appreciate the way the planners sought and received public input, especially in hearing that stakeholders preferred a resource-based plan. We hope this receptivity will be continued in further planning projects.

A few of the points that stood out to us are:

- Recognition of the tireless efforts of ordinary citizens which resulted in an extraordinary cultural act, the establishment of Topanga State Park.
- The "Spirit of Place" essay (p.4) captures a wonderful poetic vision for the preservation of natural resources in the park.
- The recognition that people expect to commune with nature, to enjoy scenic beauty, and to see and hear wildlife when they visit the park.
- The way the plan describes the park using a zone system which allows for clearer understanding of the variations in this large park.

- The importance of making the Lower Topanga area (PCH and Topanga Canyon Blvd) a beautiful, uncluttered, and natural gateway to Topanga State Park.
- The continuation of the current use of Trippet Ranch Lodge (the skeet lodge) as the Nature Center (p. 86). We look forward to the completion of renovations at the Nature Center in 2012 as stated in this General Plan.
- The acknowledgment that the Topanga Canyon Docents have worked for decades to provide interpretation and public education in the Nature Center and at the park for schoolchildren and visitors to Topanga State Park.
- The importance of the restoration of Topanga Creek and the Lagoon.

We respectfully offer these following corrections/additions to the *Preliminary General Plan/ Draft Environmental Impact Report for Topanga State Park*:

- 11-1 [• Regarding the Musch Camp trail access (p. 11): There is no trail access to Musch Camp by bikes. The only bike accessibility is by the paved service road from Hillside Drive. Therefore, Musch Camp should not be considered as an existing bike-in campground as that might seem to allow bike use on the Musch Trail.
- 11-2 [• No mention was made that the Los Angeles Audubon conducts monthly public birdwalks at Trippet Ranch (the first Sunday of each month).
- 11-3 [• The park's interpretive collections, including mounted specimens, birds' nests, etc. (p. 39), were collected over many years by the Topanga Canyon Docents and donated to CSP by the Topanga Canyon Docents.
- 11-4 [• Regarding the name change of Los Liones (Introduction, p. vii): If there is to be a name change, it should be done in a way not to confuse park users. Why not use "La Cañada de Leon" instead of Los Leones? What does Los Leones mean?
- 11-5 [• The Hondo Canyon area seems to be omitted. The Backbone Trail passes though there, and it seems this area should be recognized.
- 11-6 [• Any future land acquisitions might include 1) the Thrifty Oil property opposite the entrance to Topanga State Park at Topanga Canyon Blvd and Pacific Coast Highway, and 2) property which would connect the Summit Valley Edelman Park and Topanga State Park.
- 11-7 [• Finally, since specific trail use designations are not included in this plan, we ask that the Topanga Canyon Docents be included in future discussion and planning for the Trail Management Plan and uses for specific trails.

Sincerely,

Lynne Haigh, Lucinda Mittleman, Karin Benson, Harvey Bjornlie, Mary Patton and Marc Birenbaum

11. Topanga Canyon Docents

- 11-1. There is bike access to Musch Camp by the paved service road from Hillside Drive. Due to this access point into Musch Camp, this is considered a bike-in campground.
- 11-2. Thank you for mention of this program. It shall be included in the Interpretation Master Plan to be prepared for Topanga State Park in the future.
- 11-3. We thank the Topanga Canyon Docents for the interpretive collections they have donated to CSP.
- 11-4. The name change came about in order to correct a misspelling dating back to the 1920s. The current name of the area, trail and street name are incorrect grammar in either English or Spanish.
- 11-5. Hondo Canyon is a valuable resource that will continue to be interpreted as a valuable asset to Topanga State Park.
- 11-6. CSP would acquire property from a willing seller when funding is available.
- 11-7. We value the input you can provide in determining specific trail-use designations. To remain involved in this process , please keep in contact with the Topanga State Park Sector Superintendent to remain abreast of the latest discussions and planning .



To enrich lives through effective and caring service



Santos H. Kreimann
Director

Kerry Silverstrom
Chief Deputy

Gary Jones
Deputy Director

January 23, 2012

Luke Serna, Park & Recreation Specialist
California Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108



Subject: Topanga State Park General Plan

Dear Mr. Serna,

This is in response to the Notice of Availability and Intent to Adopt an Environmental Impact Report (EIR) for the Proposed Topanga State Park General Plan. The Los Angeles County Department of Beaches and Harbors (Department) has attended various workshops and scoping meetings over the past two years related to your department's update of the Topanga State Park General Plan. We reviewed the draft EIR and proposed General Plan updates, particularly in relation to the Lower Topanga Area to evaluate related impacts on the property owned and operated by the Department.

12-1

The Department operates the sandy beach portion of the Topanga Beach area, as well as both the unpaved and paved parking lots south (beachside) of Pacific Coast Highway (PCH) and lying west and east, respectively, of the existing Topanga Creek and Lagoon. We believe that the Department's property will be most directly impacted through the future conceptual plan for Lower Topanga Area. Our concerns include the lack of consideration for the ways in which the conceptual plan improvements would restrict beach access for day users. The proposed General Plan and associated DEIR do not contain sufficient information on the recreational impacts resulting from the scope lagoon restoration, and in particular, the expansion of PCH by means of an 80-foot bridge.

Accordingly, the Department does not fully support the proposed Lower Topanga Area management zone scope due to the potential impacts to County beach areas and possible loss of recreational area and beach access. We welcome the opportunity to further discuss alternatives to the proposed scope so as to consider impacts to property currently owned and operated by our Department.

If you have any questions, please contact our Planning Division at (310) 305-9505.

Very truly yours,

SANTOS H. KREIMANN, DIRECTOR

KATHLINE KING, PLANNING SPECIALIST
PLANNING DIVISION

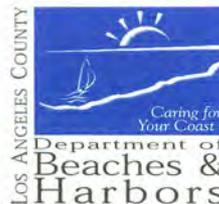
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Attachments (3)

12. LA County Beaches & Harbors

- 12-1. The General Planning team understands the concerns that the Los Angeles County Department of Beaches and Harbors (Department) has regarding beach access, lagoon restoration and the expansion of the PCH bridge over Topanga Creek. We are committed to coordinating with the Department as plans proceed forward to ensure that both agencies can meet their needs. Further detail of CSPs plans for the Lower Topanga Zone will be shared with the Department as soon as they become available. Potential recreational impacts shall be assessed once CEQA proceeds for specific projects within the Lower Topanga and Lagoon Zones of Topanga State Park. Maintaining recreational opportunities are a vital goal of CSP and we intend to ensure we avoid and/or minimize impacts to them as well as expand them.



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Santos H. Kreimann
Director

Kerry Silverstrom
Chief Deputy

Gary Jones
Deputy Director

February 15, 2012



Luke Serna, Park & Recreation Specialist
California Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Subject: Topanga State Park General Plan, Environmental Impact Report

Dear Mr. Serna,

This is in follow up to our previous response to the Notice of Availability and Intent to Adopt an Environmental Impact Report (EIR) for the Proposed Topanga State Park General Plan. Subsequent to our response letter dated January 23, 2012, we had the opportunity to discuss the General Plan and EIR with Mr. Barney Matsumoto, Southern Service Center Manager of Acquisition and Development with the State Parks Department.

13-1

We discussed with Mr. Matsumoto the vision, scope and details of the General Plan project and have a better understanding of the definition of proposed development in the Lower Topanga Area. Because it is conceptual at this stage, and impacts to County-owned and managed land on the beach have not been fully analyzed, we look forward to participating in more in-depth studies as design and development plans are finalized. Moreover, we understand the intent of the General Plan is to improve public services and access to coastal resources, and, for this reason, we support the approval of this EIR. We anticipate hearing from you with any specific impacts to County-owned and operated properties based on technical studies at a future date, as stated in the EIR.

13-2

Please note that the County's responsibility to maintain and improve public access to coastal resources is our mandate under the Coastal Act. We look forward to continued collaboration on this Plan as specific development details on the Topanga Beach County property are available. We thank you for your consideration, and please don't hesitate to contact us again if you have further questions.

Very truly yours,

SANTOS H. KREIMANN, DIRECTOR

Kathline King
KATHLINE KING, PLANNING SPECIALIST
PLANNING DIVISION

SHK:KK:il

13. LA County Beaches & Harbors follow up letter

- 13-1. CSP shall make future project plans and environmental documentation available for review by LA County Beaches and Harbors. Impacts to LA County Beaches & Harbors facilities and resources shall be defined so that those impacts may be avoided, minimized and/or mitigated.
- 13-2. It is additionally the responsibility of CSP to maintain and improve public access to coastal resources. All actions taking place within future projects shall include review by the Coastal Commission or a local jurisdiction with a Local Coastal Plan. Future actions shall also strive to meet objectives set forth within the Coastal Act or the Local Coastal Plan.

12-27-2012



I want to attend the Open Public Meeting
on the Topanga State Park General Plan.

What day of the week is this held and
at what time?

14-1

Send me the Directions to Will Rogers State
Park and the Telephone Number.

I have the address: Is this by Sunset
Blvd. before ending at P.C.H. by the Beach?

Please let me know.



Thank-you
Mr. Joe Pavesic

14. Joe Pavesic

- 14-1. The public meetings for the GP/EIR have concluded. For details regarding the public participation process that has taken place, please visit the project's website at:

http://www.parks.ca.gov/?page_id=25956

Here you will find the GP/EIR and information regarding the public participation process that has taken place.