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# 1 INTRODUCTION

## 1.1 OVERVIEW

This is the Final Program Environmental Impact Report (Program EIR) for the Road and Trail Change-in-Use Evaluation Process (Process). It contains comments on the Draft Program EIR received during the public review period, responses to significant environmental issues raised in those comments, and changes in the Program EIR since the Draft Program EIR public review. The Program EIR evaluates the environmental effects of adoption and implementation of the proposed Process and was prepared pursuant to the California Environmental Quality Act (Public Resources Code Section 21000, et seq.). In its entirety, the full Program EIR consists of this Final Program EIR document and the Draft Program EIR (including appendices, published October 5, 2012). California State Parks (CSP), the CEQA Lead Agency, will consider the analysis and conclusions in the full Program EIR for certification prior to taking action on the proposed Process.

CSP proposes to implement the Process to facilitate the review of qualifying change-in-use proposals that would add uses to or remove uses from existing recreational roads and trails in the State Park System. The proposed Process is intended to facilitate and make consistent the consideration of changes in non-motorized recreational uses on existing CSP roads and trails that best accommodate accessibility and recreational activities appropriate for each road or trail facility. The Process would provide CSP with an objective and consistent process and evaluation tool to assess change-in-use proposals that modify roads and trails. Specifically, the proposed Process is intended to achieve the following objectives:

- ▲ to implement the CSP Trail Policy, including to provide multi-use trails and trail connectivity;
- ▲ to evaluate appropriate proposals for road and trail change-in-use projects (i.e., add uses to or remove uses from existing roads and trails) in CSP units that can be implemented in a manner that avoids or clearly mitigates potential significant effects on the environment;
- ▲ to provide an objective and consistent evaluation tool and process to inform decision-making while recognizing the diversity of resources and users at each park unit; and
- ▲ to ensure that these objectives are achieved in an open and transparent process.

The proposed Process applies to decisions that are made for the addition or removal of different types of non-motorized uses of a State Park System road or trail. These types of use may include: pedestrian, accessible pedestrian, wheelchair, equestrian, mountain bike, or other unidentified non-motorized uses not currently recognized as potential road and trail use types. The proposed Process could be applied to roads and trails in a manner consistent with unit classifications within State Parks, State Recreation Areas, and State Beaches of the CSP System that are owned and managed by the State. The proposed Process would not apply to motorized recreational vehicle trails and any units operated as State Vehicular Recreation Areas.

Roads and trails qualifying for a change in use through the proposed Process would be required to implement Standard Project Requirements (SPRs), which are CSP system-wide environmental protection measures and features applied to a project's design, construction process, or operation that are implemented with the objective of avoiding significant impacts or maintaining them at less-than-significant levels. The change-in-use projects may also include Project-Specific Requirements (PSRs), which are project-specific design, construction, or operational measures tailored to the special characteristics of an individual change-in-use proposal. Change-in-use projects qualifying for approval under the proposed Process would also be subject to Adaptive Use Management (AUM) procedures, which involve: establishing baseline use conditions for the change-in-use proposal; implementing monitoring and management responses to ensure that unanticipated environmental

consequences would not cause significant impacts; and to correct, if necessary, user-created road or trail issues (refer to Section 3.6.4, Adaptive Use Management Strategy, of the Draft Program EIR for a detailed description). The determination of impact significance for a change-in-use proposal would occur only after taking the influence of these SPRs, including AUM procedures, and PSRs into account. If, despite the environmentally protective influence of the SPRs, including AUM, and PSRs, a change-in-use proposal could not avoid significant environmental impacts or clearly mitigate them to a less-than-significant level, the proposal would be disqualified from approval under the proposed Process. In such a case, CSP would need to initiate independent project planning and environmental review to pursue the project further, but could use the Program EIR to cover environmental issues that are adequately addressed in it (e.g., cumulative impacts). The project-level environmental document need only examine the effects specific to the project that are not already addressed in the Program EIR.

## 1.2 PUBLIC COMMENTS ON THE DRAFT PROGRAM EIR

The Draft Program EIR was circulated for a 60-day public comment period, from October 5, 2012 to December 4, 2012. During the review period, multiple opportunities were provided for agencies, organizations, and the public to comment on the Draft Program EIR, including the follow public meetings:

### **Saturday, October 27, 2012**

2:00 to 5:00 pm  
City of Glendale  
Adult Recreation Center (ARC)  
201 E. Colorado Street  
Glendale, CA 91205

### **Saturday, November 3, 2012**

2:00 to 5:00 pm  
Sports Basement  
1881 Ygnacio Valley Road  
Walnut Creek, CA 94598

In response to the call for review and comment, many comment letters were received, including from public agencies, stakeholder organizations (including environmental and business organizations), and the general public.

This Final Program EIR has been prepared to respond to written comments received on the Draft Program EIR, with an emphasis on comments that raise significant environmental issues, and make appropriate revisions to the document, as needed, consistent with CEQA and the CEQA Guidelines.

## 1.3 PROGRAM EIR CERTIFICATION AND PLAN APPROVAL

This document and the Draft Program EIR together constitute the Final Program EIR, which will be considered by CSP for certification prior to a decision on whether to approve the proposed Process. CSP is required by the CEQA Guidelines (Section 15090) to certify that the Final Program EIR was completed in compliance with CEQA's requirements, was reviewed and considered by the CSP decision-makers, and reflects CSP's independent judgment and analysis before approving the proposed Process. CSP will also adopt findings of fact on the disposition of each significant environmental impact, as required by CEQA Guidelines §15091(a). Because the Program EIR found that no unavoidable significant impacts would occur, a statement of overriding considerations, which is required by CEQA Guidelines §15093 when a project would cause an unavoidable significant effect on the environment, is not needed. A Mitigation Monitoring and Reporting Program, as required by CEQA Guidelines §15091(d), will also be adopted for monitoring the implementation of mitigation measures adopted to address significant effects.

## 1.4 ORGANIZATION AND FORMAT OF THE FINAL PROGRAM EIR

This Final Program EIR is organized into two volumes as follows:

### Volume 1

- ▲ Chapter 1, “Introduction,” provides an overview of the Final Program EIR context, and the environmental review process and presents a discussion of the Program EIR certification and Process approval.
- ▲ Chapter 2, “List of Commenters and Response to Comments,” consists of the written comments received on the Draft Program EIR, followed by responses to significant environmental issues raised in the comments (as required by the State CEQA Guidelines § 15132). The focus of the responses to comments is on the disposition of significant environmental issues that are raised in the comments, as specified by Section 15088(c) of the State CEQA Guidelines. Detailed responses are required for comments on the merits of the proposed Process that do not raise significant environmental issues. However, when a comment is not directed to significant environmental issues, the response indicates that the comment has been noted and that no further response is necessary.
- ▲ Chapter 3, “Revisions and Corrections to the Draft Program EIR,” present corrections, clarifications and other revisions to the Draft Program EIR text. Revisions are shown as excerpts from the Draft Program EIR text, with strikethrough (~~strikethrough~~) text for deletions and double-underlined (underlined) text for additions. The changes appear in the order of their location in the Draft Program EIR.
- ▲ Chapter 4, “References,” lists references cited in this Final Program EIR.

### Volume 2

Volume 2 contains all the written comments on the Draft Program EIR.

- ▲ Agencies Comment Letters
- ▲ Organizations Comment Letters
- ▲ Persons Comment Letters
- ▲ Concerned Off-Road Bicyclists Association Notice of Preparation Comment Letter, November 30, 2010 (While this letter was considered during preparation of the Draft Program EIR, a copy of it was inadvertently omitted from that document).

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## 2 LIST OF COMMENTERS AND RESPONSES TO COMMENTS

This Road and Trail Change-in-Use Evaluation Process (Process) Final Program EIR includes all comments received during the public review period for the Draft Program EIR and responds to significant environmental issues raised in those comments. As described in Chapter 1, California State Parks (CSP), the California Environmental Quality Act (CEQA) lead agency, provided a 60-day review period for the Draft Program EIR that began on October 5, 2012 and ended December 4, 2012. During the review period, public meetings were held on October 27, 2012 and November 3, 2012 to solicit comments on the Draft Program EIR. Details about these public comment opportunities are provided in Chapter 1, Introduction, of the Draft Program EIR.

### 2.1 FORMAT OF COMMENTS AND RESPONSES

Responses to written public comments on the Road and Trail Change-In-Use Evaluation Process Draft Program EIR are provided in this chapter of this Final Program EIR. They are divided into Agency Comments, Organization Comments, and Persons Comments. Comment letters and responses to comments in this chapter of the Final Program EIR are arranged and coded as follows:

- ▲ Agencies (A)
- ▲ Organizations (O)
- ▲ Persons (P)

Each letter and each comment within a letter have been given an identification number. Responses are numbered so that they correspond to the appropriate comment. Where appropriate, responses are cross referenced between letters or to a Master Response. Master Responses are provided for topics that are raised by multiple commenters and/or would benefit from a more comprehensive response than would be provided to address a single comment.

Where a commenter has provided multiple comments, each comment is indicated by brackets and an identifying letter/number notation in the margin of the comment letter (for instance, Comment A1-1 is the first comment in comment letter A1). Responses are numbered to correspond to specific comments. All comment letters are reproduced in their entirety in Volume 2 of this Final Program EIR.

In addition to responses to individual comment letters, this chapter contains Master Responses. Master Responses address comment topics raised by multiple commenters and/or issues that would benefit from a more comprehensive response than would be provided in a single, focused, individual response. Four Master Responses are included in this document:

- ▲ Master Response 1: Clarification Related to the Purpose and Intent of this Program EIR
- ▲ Master Response 2: Comments Related to Safety on Multi-Use Trails
- ▲ Master Response 3: Comments Related to Trail Design to Accommodate New Recreational Uses
- ▲ Master Response 4: Comments Related to Limits of Development in State Parks that are Considered “Attractions in Themselves”

In some instances, responses to comments may warrant modification of the text of the Draft Program EIR. In those cases, information that is to be deleted is shown in strikethrough (strikethrough) and additions are shown in double-underline (underline). Text changes resulting from comments and their accompanying responses have been incorporated into the original Draft Program EIR text, as indicated in the responses. All corrections and changes to the text of the Draft Program EIR are contained in Chapter 3 of this Final Program EIR.

All of the text changes made in response to public comments result in minor modifications to the original Draft Program EIR text. None of the changes included in this Final Program EIR resulted in new significant environmental effects or a substantial increase in the severity of any previously identified significant effects, so the changes do not warrant recirculation of all or part of the Program EIR for another public review.

## 2.2 LIST OF COMMENTERS

CSP received many comments that addressed multiple issues. Table 2-1 provides a list of all agencies, organizations and persons that submitted comments during the public review period. The method employed by CSP for receipt of comments at the two public meetings on the Draft Program EIR was by written comment card, so no oral comments have been recorded for response in this document.

| <b>Table 2-1 List of Commenters</b>                                                                                       |                  |             |
|---------------------------------------------------------------------------------------------------------------------------|------------------|-------------|
| <b>Commenter</b>                                                                                                          | <b>Letter ID</b> | <b>Date</b> |
| <b>Agencies</b>                                                                                                           |                  |             |
| Central Valley Flood Protection Board – James Herota, Staff Environmental Scientist                                       | A1               | 10/22/12    |
| California State Clearinghouse and Planning Unit – Sean Morgan, Director                                                  | A2               | 11/20/12    |
| California State Water Resources Control Board – Catherine Woody                                                          | A3               | 11/30/12    |
| County of San Bernadino Department of Public Works – Annesley Ignatius, Deputy Director – Land Development & Construction | A4               | 12/3/12     |
| County of Santa Clara, Parks and Recreation Department – Elish Ryan, Park Planner                                         | A5               | 12/4/12     |
| National Park Service, Santa Monica Mountains National Recreation Area – David Szymanski, Superintendent                  | A6               | 12/4/12     |
| <b>Organizations (Listed Alphabetically)</b>                                                                              |                  |             |
| Allied Climbers of San Diego – Kevin Dalfonzo, ACSD President                                                             | O1               | 12/4/12     |
| California Equestrian Trails & Lands Coalition – William O. Davis, Attorney at Law                                        | O2               | 10/2012     |
| California Native Plants Society – Greg Suba, Conservation Program Director                                               | O3               | 12/4/12     |
| Concerned Off-Road Bicyclists Association – Steve Messer, Vice President                                                  | O4               | 12/4/12     |
| International Mountain Bicycling Association – Tom Ward                                                                   | O5               | 12/4/12     |
| Lake Oroville Bicyclists Organization Trails Advocate – Lyle Wright                                                       | O6               | 12/2/12     |
| Los Angeles County Bicycle Coalition – Eric Bruins, Planning and Policy Director                                          | O7               | 11/1/12     |
| Los Angeles Equine Advisory Committee – R. Dale Gibson, President                                                         | O8               | 11/29/12    |
| Marin County Bicycle Coalition – Erik Schmidt, Off-road Director                                                          | O9               | 12/3/12     |
| Marin Conservation League – Susan Stompe, President and Nona Dennis, Chair – Parks and Open Space Committee               | O10              | 12/4/12     |
| Marin Horse Council – Curt Kruger, Trails Committee Chair                                                                 | O11              | 11/28/12    |
| Mendocino Coast Cyclists, Inc. – Amy Wynn, Vice President                                                                 | O12              | 11/10/12    |
| Pine Ridge Association – Paul Nam, President (please refer to Persons Letters P456 and P457)                              | --               | --          |
| Sierra Club, California – Alan Carlton, Attorney at Law                                                                   | O13              | 11/22/12    |
| Tahoe Area Mountain Biking Association – Kevin Joell, President                                                           | O14              | 12/4/12     |

| <b>Table 2-1 List of Commenters</b>                 |                  |             |
|-----------------------------------------------------|------------------|-------------|
| <b>Commenter</b>                                    | <b>Letter ID</b> | <b>Date</b> |
| <b>Persons (Listed Alphabetically by Last Name)</b> |                  |             |
| Stephanie Abronson, Pony Cross Farm                 | P1               | 10/16/12    |
| Stephanie Abronson                                  | P2               | 10/27/12    |
| Randall Adams                                       | P3               | 11/29/12    |
| Heidi Adler                                         | P4               | 11/27/12    |
| Tim Agawa                                           | P5               | 11/19/12    |
| Fadi Ahad                                           | P6               | 11/28/12    |
| Tariq Ahmed                                         | P7               | 11/19/12    |
| Eddie Alberton                                      | P8               | 11/16/12    |
| Douglas M. Allan                                    | P9               | 12/3/12     |
| Allen Purdy                                         | P10              | 11/20/12    |
| Roger Alstad                                        | P11              | 11/16/12    |
| Jack Altevers                                       | P12              | 11/27/12    |
| Sarah Alvarado                                      | P13              | 11/27/12    |
| Bill Alvarez                                        | P14              | 12/3/12     |
| Jim Alwyn                                           | P15              | 11/16/12    |
| Matt Ammann                                         | P16              | 11/16/12    |
| Adam Anderson                                       | P17              | 11/27/12    |
| David Anderson                                      | P18              | 11/27/12    |
| Glenn Anderson                                      | P19              | 12/1/12     |
| Steve Anderson                                      | P20              | 11/17/12    |
| Soni Andreini Poulsen                               | P21              | 11/27/12    |
| Sandy Arledge                                       | P22              | 11/27/12    |
| Esther Armengol                                     | P23              | 11/27/12    |
| Fred Armisen                                        | P24              | 11/30/12    |
| David Ashin                                         | P25              | 11/17/12    |
| Nicole Auckerman and Brian Terkleson                | P26              | 1/28/12     |
| Marcel Ayers                                        | P27              | 11/27/12    |
| Rob Baker                                           | P28              | 12/2/12     |
| Marcia Balbus                                       | P29              | None        |
| Dennis Ball                                         | P30              | 11/20/12    |
| Mike Barbaro                                        | P31              | 11/18/12    |
| Jeff Barker                                         | P32              | 12/3/12     |
| Shannon Barker                                      | P33              | 11/17/12    |
| Matthew Bartelt                                     | P34              | 11/27/12    |
| Russell Bartz                                       | P35              | 12/4/12     |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Jonathan Baty                       | P36              | 11/16/12    |
| Al Baumann                          | P37              | 12/3/12     |
| Al Baumann                          | P38              | 12/3/12     |
| Craig Beacock                       | P39              | 11/26/12    |
| Bob Becker                          | P40              | 11/27/12    |
| Thomas Becker                       | P41              | 11/28/12    |
| John Beckmann                       | P42              | 11/18/12    |
| Becky Bell                          | P43              | 12/3/12     |
| Gary Bell                           | P44              | 12/4/12     |
| John Bell                           | P45              | 11/16/12    |
| Brad Benam                          | P46              | 11/17/12    |
| Craig Bender                        | P47              | None        |
| Booker Bense                        | P48              | 11/16/12    |
| Mary Benson                         | P49              | 10/27/12    |
| Mary Benson                         | P50              | 10/27/12    |
| Tom Berge                           | P51              | 10/27/12    |
| Saul Berman                         | P52              | None        |
| Steve Berman                        | P53              | 11/16/12    |
| Peter Berridge                      | P54              | 11/16/12    |
| Shayne Berridge                     | P55              | None        |
| Mike Bettger                        | P56              | 11/16/12    |
| Kathryn Biasotti                    | P57              | 11/29/12    |
| Joshua Bietz                        | P58              | 11/28/12    |
| Shawn Biglari                       | P59              | 11/27/12    |
| Franklin Blackford                  | P60              | 11/16/12    |
| Wm. Chas Blackford                  | P61              | 10/17/12    |
| Kenneth Blaedel                     | P62              | 11/27/12    |
| Gus Blanco                          | P63              | 11/29/12    |
| Matthew Boser                       | P64              | 11/17/12    |
| Joanne Boswell                      | P65              | 10/16/12    |
| Gary Boulanger                      | P66              | 11/30/12    |
| Jeffrey Bowers                      | P67              | 11/20/12    |
| Karl Bowers                         | P68              | 11/27/12    |
| Diana Boyer                         | P69              | 12/4/12     |
| Hannes Braberg                      | P70              | 11/18/12    |
| Patrick Brady                       | P71              | 11/16/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Clifford J. Bramlett                | P72              | 11/18/12    |
| Troy Braswell                       | P73              | 11/16/12    |
| Justin Breazeale                    | P74              | 11/27/12    |
| Daryl Breuninger                    | P75              | 12/4/12     |
| F. Bronner                          | P76              | 10/16/12    |
| Greg Brown                          | P77              | 11/20/12    |
| Jeffrey Brown                       | P78              | 11/27/12    |
| Justin Brown                        | P79              | 11/20/12    |
| Lynn Brown                          | P80              | 11/6/12     |
| Sperry Brown                        | P81              | 11/16/12    |
| Ken Bruce                           | P82              | 11/16/12    |
| Ronald F. Brusha                    | P83              | 10/29/12    |
| Joe Bryant                          | P84              | 11/16/12    |
| Richard Bryant                      | P85              | 11/27/12    |
| Mallory Burda                       | P86              | 11/28/12    |
| Jim Busby                           | P87              | 11/25/12    |
| Michael Butler                      | P88              | 11/16/12    |
| Rosemarie Butler                    | P89              | 11/16/12    |
| Frank Caceres                       | P90              | 10/27/12    |
| Laverne A. S. Caceres               | P91              | 10/27/12    |
| Cory Caletti                        | P92              | 11/21/12    |
| Curtis Campi                        | P93              | 11/28/12    |
| Laurie Carpenter                    | P94              | None        |
| Ali Cehreli                         | P95              | 11/23/12    |
| Gene Cheltenham                     | P96              | None        |
| Damon Chidester                     | P97              | 11/17/12    |
| Isaac Chilton                       | P98              | 12/3/12     |
| Lori Christensen                    | P99              | None        |
| Mark Christopherson                 | P100             | 11/27/12    |
| Patty Ciesla                        | P101             | None        |
| David Civiello                      | P102             | 11/20/12    |
| Clint Claassen                      | P103             | 11/16/12    |
| Steve Clark                         | P104             | 11/30/12    |
| Melissa Cline                       | P105             | 12/3/12     |
| Justin Colburn                      | P106             | 11/28/12    |
| Tom Coleman                         | P107             | 11/26/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| John Coomes                         | P108             | 11/16/12    |
| Joe Coonan                          | P109             | 11/28/12    |
| Ryan Corley                         | P110             | 12/3/12     |
| Tracy Corral                        | P111             | 11/30/12    |
| Michael Cortes                      | P112             | 11/27/12    |
| Darren Cortines                     | P113             | 11/28/12f   |
| Christopher Costello                | P114             | 11/17/12    |
| Lans Courtney                       | P115             | 12/4/12     |
| Candice Covello                     | P116             | 11/26/12    |
| Tami Cramer                         | P117             | 11/28/12    |
| Mitch Crawford                      | P118             | 11/27/12    |
| Christine Cremo                     | P119             | 11/28/12    |
| Aidan Crisp                         | P120             | 11/27/12    |
| Gloria Crisp                        | P121             | 11/27/12    |
| Michael Crisp                       | P122             | 11/27/12    |
| Keith Cronk                         | P123             | 11/30/12    |
| Andy Crow                           | P124             | 11/18/12    |
| James Crowley                       | P125             | 11/18/12    |
| Matthew Crowther                    | P126             | 11/18/12    |
| Jay Culligan                        | P127             | 11/27/12    |
| Lola Cumiford                       | P128             | None        |
| Richard Cunningham                  | P129             | 11/19/12    |
| Grant Davis                         | P130             | 11/27/12    |
| Mark Davis                          | P131             | 11/18/12    |
| Jan de Jong                         | P132             | 11/18/12    |
| Jim de la Riva                      | P133             | 10/18/12    |
| Jessica De Wit                      | P134             | 11/18/12    |
| Roland Dechaine                     | P135             | 11/28/12    |
| Ed Dee                              | P136             | 11/16/12    |
| Rick Denman                         | P137             | 11/16/12    |
| Dustin Dennis                       | P138             | 11/16/12    |
| Mark DePonzi                        | P139             | 11/27/12    |
| Jeanette Deybrook                   | P140             | None        |
| Jonathan Dickey                     | P141             | 11/27/12    |
| Mae Lon Ding                        | P142             | 11/16/12    |
| Scott Dinslage                      | P143             | 11/27/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Doug Dittrich                       | P144             | 11/29/12    |
| Diane Dixon-Johnson                 | P145             | 11/27/12    |
| Diane Dixon-Johnson                 | P146             | 11/27/12    |
| Diane Dixon-Johnson                 | P147             | 10/27/12    |
| Diane Dixon-Johnson                 | P148             | 10/27/12    |
| Diane Dixon-Johnson                 | P149             | 10/27/12    |
| Diane Dixon-Johnson                 | P150             | 10/27/12    |
| Diane Dixon-Johnson                 | P151             | None        |
| Diane Dixon-Johnson                 | P152             | None        |
| Diane Dixon-Johnson                 | P153             | None        |
| Diane Dixon-Johnson                 | P154             | None        |
| Diane Dixon-Johnson                 | P155             | None        |
| Diane Dixon-Johnson                 | P156             | None        |
| Diane Dixon-Johnson                 | P157             | None        |
| Michael Do Couto                    | P158             | 11/26/12    |
| Joe Dobson                          | P159             | 11/23/12    |
| Mark Dochtermann                    | P160             | 11/27/12    |
| Linda Doebel                        | P161             | None        |
| Kevin Doherty                       | P162             | 11/27/12    |
| Cliff Doi                           | P163             | 11/28/12    |
| Kristi Dommen                       | P164             | 12/3/12     |
| Aaron Donner                        | P165             | 11/27/12    |
| Brandon Dorman                      | P166             | 11/16/12    |
| Kevin Doucet                        | P167             | 11/18/12    |
| Tim Drennon                         | P168             | 11/28/12    |
| Joseph Drnec                        | P169             | 11/29/12    |
| Linda Dubin                         | P170             | None        |
| Joy Dugger                          | P171             | 11/30/12    |
| Roger Dye                           | P172             | 11/16/12    |
| John Early                          | P173             | 11/27/12    |
| Geoff Eckert                        | P174             | 11/16/12    |
| Ron Edelman                         | P175             | 12/4/12     |
| Chuck Edgin                         | P176             | 11/28/12    |
| Steven Edney                        | P177             | 11/16/12    |
| Matt Eggers                         | P178             | 11/16/12    |
| Regina Ehrmann-Hanlon               | P179             | 11/17/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Carlos Elias                        | P180             | 12/1/12     |
| Katy Endicott                       | P181             | 11/17/12    |
| Mike Entera                         | P182             | 11/28/12    |
| Ronna Esgensen                      | P183             | 11/17/12    |
| Bob Estes                           | P184             | 12/4/12     |
| Jesse Ettinger                      | P185             | 11/30/12    |
| Eileen Everett                      | P186             | 11/28/12    |
| Georgia and Chris Farinella         | P187             | 10/24/12    |
| Cory Farrer                         | P188             | 11/16/12    |
| Desmond Feher                       | P189             | 11/21/12    |
| Drew Fenton                         | P190             | 10/19/12    |
| Jean-Luc Ferre                      | P191             | 11/16/12    |
| David M. Finch                      | P192             | 11/25/12    |
| John Finch                          | P193             | 12/2/12     |
| Doug Findlay                        | P194             | 11/29/12    |
| Paul Finn                           | P195             | 11/17/12    |
| Ben Fish                            | P196             | 12/4/12     |
| Rich Fish                           | P197             | 11/20/12    |
| John Fisher                         | P198             | 11/16/12    |
| Mark Fitzsimmons                    | P199             | 11/25/12    |
| Todd Fitzwater                      | P200             | 11/16/12    |
| Joseph Floren                       | P201             | 11/19/12    |
| Mark Fogarty                        | P202             | 11/28/12    |
| David Fong                          | P203             | 11/28/12    |
| Thomas Foote                        | P204             | 11/16/12    |
| Billy Frates                        | P205             | 12/1/12     |
| Derek Fraychineaud                  | P206             | 11/27/12    |
| Israel Fregoso                      | P207             | 11/27/12    |
| Brad Freitag                        | P208             | 11/16/12    |
| Kurt Frieden                        | P209             | 12/1/12     |
| John Fuchs                          | P210             | 12/3/12     |
| Miguel Fuentes                      | P211             | 11/27/12    |
| Linda Fullerton                     | P212             | 10/27/12    |
| Kevin Gaffney                       | P213             | 11/27/12    |
| Maureen Gaffney                     | P214             | 12/3/12     |
| Hilary Gans                         | P215             | 11/17/12    |

| <b>Table 2-1 List of Commenters</b>                          |                  |             |
|--------------------------------------------------------------|------------------|-------------|
| <b>Commenter</b>                                             | <b>Letter ID</b> | <b>Date</b> |
| Aaron Garcia                                                 | P216             | 11/28/12    |
| Aaron Garcia                                                 | P217             | 11/19/12    |
| Joseph Garcia                                                | P218             | 11/29/12    |
| Kristabel Garcia-Diaz                                        | P219             | 11/21/12    |
| Mike Gaskins                                                 | P220             | 11/27/12    |
| Valerie Gates                                                | P221             | 10/26/12    |
| Darrin Geahry                                                | P222             | 11/18/12    |
| Dave George                                                  | P223             | 11/16/12    |
| Drew George                                                  | P224             | 12/4/12     |
| Linda and David George                                       | P225             | 12/3/12     |
| Ruth Gerson, President – Recreation and Equestrian Coalition | P226             | 12/4/12     |
| Ruth Gerson                                                  | P227             | 10/15/12    |
| Ryan Gibson                                                  | P228             | 11/16/12    |
| Lorenz Glaza                                                 | P229             | 11/17/12    |
| Marian Goldeen                                               | P230             | 12/3/12     |
| Bob Gonzales                                                 | P231             | 11/17/12    |
| Jose Gonzales                                                | P232             | 11/28/12    |
| Michael Goodman                                              | P233             | 11/27/12    |
| Sean Gordon                                                  | P234             | 11/16/12    |
| Paul Goss                                                    | P235             | 11/30/12    |
| Chris Gould                                                  | P236             | 12/3/12     |
| Oliver Govers                                                | P237             | 11/28/12    |
| Eric Grabow                                                  | P238             | 11/16/12    |
| Gardner Grady                                                | P239             | 12/3/12     |
| Ryan Graham                                                  | P240             | 12/3/12     |
| Lisa Granata                                                 | P241             | 11/30/12    |
| Laird Grant                                                  | P242             | 11/27/12    |
| Rebecca Gray                                                 | P243             | 12/3/12     |
| Raymond Greenwald                                            | P244             | 12/3/12     |
| Joan Gregg                                                   | P245             | 11/18/12    |
| Fritz Greve                                                  | P246             | 11/27/12    |
| Fritz Greve                                                  | P247             | 11/16/12    |
| John Groenhof                                                | P248             | 12/7/12     |
| Grant Grundler                                               | P249             | 11/16/12    |
| Ralph Grundler                                               | P250             | 11/27/12    |
| Bruce Gruver                                                 | P251             | 11/30/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Joe Guardado                        | P252             | 11/27/12    |
| Scott and Sarah Guillaudeu          | P253             | 12/3/12     |
| Ergin Guney                         | P254             | 11/23/12    |
| Jesse Gutierrez                     | P255             | 12/1/12     |
| Paul Gyorey                         | P256             | 11/30/12    |
| Cathy Haagen-Smit                   | P257             | 12/3/12     |
| John Haaker                         | P258             | 11/17/12    |
| Gerald Haddock                      | P259             | 11/16/12    |
| Shirley Haggstrom                   | P260             | Unknown     |
| Richard Hall                        | P261             | 11/27/12    |
| Mallory Ham                         | P262             | 12/3/12     |
| Anders Hambrgen                     | P263             | 11/17/12    |
| William and Terra Hangen            | P264             | 10/17/12    |
| Stephen Hanlon                      | P265             | 11/16/12    |
| Patrick Hannum                      | P266             | 11/28/12    |
| Patrick Hannum                      | P267             | 11/28/12    |
| Gerry Hans and Mary Button          | P268             | 11/19/12    |
| Erik Hansen                         | P269             | 12/9/12     |
| James Hansen                        | P270             | 11/16/12    |
| Linda Hansen                        | P271             | 11/19/12    |
| Jane Harrington                     | P272             | 10/27/12    |
| Jane Harrington                     | P273             | 11/3/12     |
| Tim Harrington                      | P274             | 11/28/12    |
| Jeff Harris                         | P275             | 11/29/12    |
| Kevin Harris                        | P276             | 11/18/12    |
| Nancy Harris                        | P277             | 11/28/12    |
| Ryan Harris                         | P278             | 11/16/12    |
| David Harrison                      | P279             | 12/1/12     |
| Michael Hartlaub                    | P280             | 11/18/12    |
| Jim Hasenauer                       | P281             | 12/3/12     |
| Vanessa Hauswald                    | P282             | 11/16/12    |
| Duane Hawner                        | P283             | 11/16/12    |
| George Hays                         | P284             | 11/16/12    |
| Rick Heath                          | P285             | 11/25/12    |
| Michael Heede                       | P286             | 11/19/12    |
| Kurt Heidner                        | P287             | 11/19/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Doug Helmstetler                    | P288             | 11/16/12    |
| Richard Henke                       | P289             | 11/27/12    |
| Russell Henmi                       | P290             | 11/17/12    |
| Caroline Hennig                     | P291             | 11/17/12    |
| Carol Henning                       | P292             | 10/27/12    |
| Michael Heskett                     | P293             | 11/27/12    |
| Eric Hess                           | P294             | 11/19/12    |
| Gary Hill                           | P295             | 11/16/12    |
| Gary Hill                           | P296             | 11/27/12    |
| Erik Hillard                        | P297             | 11/27/12    |
| Daniel Himes                        | P298             | 11/19/12    |
| Brian Hirt                          | P299             | 11/17/12    |
| Rick Hobbs                          | P300             | 11/29/12    |
| Edin Hodzic                         | P301             | 11/27/12    |
| Jeannette Holliday                  | P302             | 11/16/12    |
| Ron Holt                            | P303             | 11/16/12    |
| Daniel Hooks                        | P304             | 11/18/12    |
| Mark Hoover                         | P305             | 11/27/12    |
| Peter Hopkinson                     | P306             | 11/27/12    |
| John Horning                        | P307             | 11/29/12    |
| Robert Horowitz                     | P308             | 11/18/12    |
| Robert Horowitz                     | P309             | 11/30/12    |
| Jordan Hosmer                       | P310             | 12/3/12     |
| Dennis Hou                          | P311             | 11/18/12    |
| Gerald Houkette                     | P312             | 11/18/12    |
| Dan Howes                           | P313             | 11/28/12    |
| James Hoyle                         | P314             | 11/27/12    |
| Tracy Hrach                         | P315             | 11/17/12    |
| Robert Hubbard                      | P316             | 11/17/12    |
| Lloyd Huey                          | P317             | 11/29/12    |
| Noreen Irving                       | P318             | 11/27/12    |
| Debbie Isakson                      | P319             | 12/4/12     |
| Steve Iverson                       | P320             | 11/28/12    |
| Kevin Ivey                          | P321             | 11/27/12    |
| Douglas Jacobson                    | P322             | 11/16/12    |
| Abdullah Jamali                     | P323             | 11/16/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| John Jaramillo                      | P324             | 11/27/12    |
| Kurt Jensen                         | P325             | 11/27/12    |
| Darin Jesberg                       | P326             | 11/19/12    |
| Aaron Johnson                       | P327             | 11/16/12    |
| Shannon Johnson                     | P328             | 11/27/12    |
| Ted Johson                          | P329             | 11/26/12    |
| Jennifer Joy                        | P330             | 12/3/12     |
| Jennifer Jozwiak                    | P331             | 11/28/12    |
| Kathryn A. Julian                   | P332             | 12/2/12     |
| Julie Kanagy                        | P333             | 11/18/12    |
| Chris Kangas                        | P334             | 11/27/12    |
| Joe Keays                           | P335             | 11/17/12    |
| Brian Kelly                         | P336             | 11/27/12    |
| James Kenney                        | P337             | Unknown     |
| Keith Kenworthy                     | P338             | 12/3/12     |
| Roger Kern                          | P339             | 11/28/12    |
| Nat Kidder                          | P340             | 11/18/12    |
| Alan Kilmer                         | P341             | 11/17/12    |
| Mike Kim                            | P342             | 11/27/12    |
| Brian King                          | P343             | 11/27/12    |
| John Kingsbury                      | P344             | 11/20/12    |
| Mark Kintz                          | P345             | 11/16/12    |
| Jim Kirstein                        | P346             | 11/3/12     |
| Joan and Ingolf Kengler             | P347             | Unknown     |
| Andreas Knoefel                     | P348             | 12/1/12     |
| Joshua Kompa                        | P349             | 11/27/12    |
| Mark Kovacic                        | P350             | 12/3/12     |
| Steve Kowaleski                     | P351             | 12/1/12     |
| Mark Kramer                         | P352             | 11/27/12    |
| John Kross                          | P353             | unknown     |
| Darrel Kuhse                        | P354             | 12/1/12     |
| John Kwok                           | P355             | 11/27/12    |
| Cedar Kyes                          | P356             | 11/18/12    |
| Trung Lam                           | P357             | 11/19/12    |
| Brent C. Lamb                       | P358             | 10/16/12    |
| Brooks Lambert                      | P359             | 11/26/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Jeff Lampert                        | P360             | 11/16/12    |
| Lance Laspina                       | P361             | 11/17/12    |
| Marc Laurent                        | P362             | 11/16/12    |
| Lane Lawrence                       | P363             | 11/17/12    |
| Ross Lawson                         | P364             | 11/27/12    |
| Deborah Laxague                     | P365             | 11/16/12    |
| David Lazzarini                     | P366             | 12/4/12     |
| Richard Lee                         | P367             | 11/18/12    |
| Alec Lentz                          | P368             | 11/27/12    |
| Kato Leong                          | P369             | 11/27/12    |
| Andrew Leung                        | P370             | 11/20/12    |
| Paul Liebenberg                     | P371             | 11/20/12    |
| David Liebert                       | P372             | 11/17/12    |
| Skip Lobb                           | P373             | 11/26/12    |
| Ryan Loften                         | P374             | 11/30/12    |
| Eric Lohela                         | P375             | 11/16/12    |
| Jason Lombard                       | P376             | 11/16/12    |
| Joe Long                            | P377             | 11/16/12    |
| David Loudenback                    | P378             | 11/16/12    |
| Todd Luman                          | P379             | 11/16/12    |
| Derek Maak                          | P380             | 12/4/12     |
| John MacKenzie                      | P381             | 11/30/12    |
| Scott MacKenzie                     | P382             | 11/16/12    |
| Ed Mackey                           | P383             | 11/28/12    |
| Lauri Mackey                        | P384             | 11/29/12    |
| Philip Madeley                      | P385             | 11/27/12    |
| Janet Maker                         | P386             | Unknown     |
| Nick Mallonee                       | P387             | 11/19/12    |
| Dana Manchester                     | P388             | 11/27/12    |
| Doug Mann                           | P389             | 11/20/12    |
| Doug Mann                           | P390             | 11/27/12    |
| Cyril Manning                       | P391             | 11/16/12    |
| Manwaring-Mueller                   | P392             | 10/18/12    |
| James Markovsky                     | P393             | 11/27/12    |
| Hugo Martin                         | P394             | 11/28/12    |
| Matthew Martin                      | P395             | 11/18/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Seth Mason                          | P396             | 11/20/12    |
| Hillary Mathis                      | P397             | 12/2/12     |
| John Matocq                         | P398             | 11/5/12     |
| Jorge Matos                         | P399             | 11/17/12    |
| Todd Matthews                       | P400             | 11/27/12    |
| Cynthia Maxwell                     | P401             | 11/27/12    |
| William May                         | P402             | 11/18/12    |
| Troy Mayers                         | P403             | 11/27/12    |
| Troy Mayr                           | P404             | 11/27/12    |
| Brian McCarthy                      | P405             | 11/29/12    |
| Jim McCarthy                        | P406             | 11/28/12    |
| Kevin McCauley                      | P407             | 11/18/12    |
| James McCray                        | P408             | 12/2/12     |
| Scott McDonald                      | P409             | 11/29/12    |
| Sharon McGuire                      | P410             | 11/16/12    |
| James McIlvain                      | P411             | 11/27/12    |
| Charles McKee                       | P412             | 11/17/12    |
| Sean McKenna                        | P413             | 11/19/12    |
| Mark McKinsey                       | P414             | 11/27/12    |
| Todd McMahan                        | P415             | 11/17/12    |
| Mike McMan                          | P416             | 11/26/12    |
| James McNeill                       | P417             | 11/28/12    |
| Robert McVicker                     | P418             | 11/16/12    |
| Michael Mejia                       | P419             | 11/17/12    |
| Fabienne Melkanoff                  | P420             | Unknown     |
| Reed Melton                         | P421             | 11/18/12    |
| Barry Mendelson                     | P422             | 11/19/12    |
| Michael Menjou                      | P423             | 11/28/12    |
| Samuel Mercado                      | P424             | 11/27/12    |
| Gus Meyner                          | P425             | 12/3/12     |
| Erik Mickelson                      | P426             | 11/28/12    |
| Robert Mikuteit                     | P427             | 12/3/12     |
| Barbara Miller                      | P428             | Unknown     |
| Johann Miller                       | P429             | 11/27/12    |
| Jon Miller                          | P430             | 11/17/12    |
| Justin Miller                       | P431             | 11/18/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
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| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Michael Miller                      | P432             | 11/28/12    |
| Polly Miller                        | P433             | Unknown     |
| Tom Miller                          | P434             | 11/16/12    |
| David Minor                         | P435             | 11/16/12    |
| Gary Miranda                        | P436             | 11/18/12    |
| Lucinda Mittleman                   | P437             | 12/3/12     |
| Robert Moffitt                      | P438             | 11/27/12    |
| Al Moggia                           | P439             | 11/1/12     |
| Nick Monroy                         | P440             | 12/4/12     |
| Chris Montagna                      | P441             | 12/2/12     |
| Clayton Moore                       | P442             | 11/27/12    |
| Mike Moore                          | P443             | 11/27/12    |
| Jeff Morgan                         | P444             | 11/18/12    |
| Peter Moritzburke                   | P445             | 11/22/12    |
| Lisa Morse                          | P446             | 12/3/12     |
| Mark Moskowitz                      | P447             | 11/18/12    |
| William Moss                        | P448             | 11/17/12    |
| Obay Mouradi                        | P449             | 11/27/12    |
| Christopher Munoz                   | P450             | 11/28/12    |
| Donald Murchie                      | P451             | Unknown     |
| Mary Murray                         | P452             | 11/16/12    |
| Stefan Mussen                       | P453             | 11/16/12    |
| John Mylne                          | P454             | 11/20/12    |
| Nitish Nag                          | P455             | 11/19/12    |
| Paul Nam                            | P456             | Unknown     |
| Paul Nam                            | P457             | 12/4/12     |
| Luis Navarro                        | P458             | 11/27/12    |
| Dolores Nelson                      | P459             | 12/3/12     |
| Emily Neuman                        | P460             | 11/16/12    |
| Lon Neumann                         | P461             | 12/1/12     |
| Tom Nguyen                          | P462             | 11/27/12    |
| Bill Niles                          | P463             | 11/28/12    |
| Brian Nixon                         | P464             | 11/23/12    |
| Charmaine No Last Name              | P465             | Unknown     |
| Pete No Last Name                   | P466             | 11/27/12    |
| Ben Nordstrom                       | P467             | 11/18/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
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| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Iffiok-Obong Nsek                   | P468             | 11/28/12    |
| Robert Nunes                        | P469             | 11/16/12    |
| Daniel Nunez                        | P470             | 11/19/12    |
| Daniel Nunez                        | P471             | 11/28/12    |
| Ivo Obregon                         | P472             | 11/16/12    |
| Dan Oehlberg                        | P473             | 11/27/12    |
| Michael Ohnysty                     | P474             | 11/27/12    |
| Tomasz Olesiejuk                    | P475             | 11/28/12    |
| Carlos Orosco                       | P476             | 11/17/12    |
| Joel Orth                           | P477             | 11/17/12    |
| Matthew Ortiz                       | P478             | 11/28/12    |
| Sonia Ottusch                       | P479             | 11/30/12    |
| Scott Owen                          | P480             | 12/4/12     |
| Doug Page                           | P481             | 12/3/12     |
| Kevin Paugh                         | P482             | 11/27/12    |
| Jeff Paulson                        | P483             | 12/4/12     |
| Sante Pelot                         | P484             | 11/26/12    |
| Bryce Perkins                       | P485             | 11/28/12    |
| James Petzel                        | P486             | 11/28/12    |
| Katherine Pfeiffer, Ph.D.           | P487             | 10/17/12    |
| James Philip                        | P488             | 11/28/12    |
| Harley Phillips                     | P489             | 11/18/12    |
| Tracy Piasecki                      | P490             | 10/19/12    |
| Bert Pierroz                        | P491             | 12/4/12     |
| Dean Pohlmann                       | P492             | 12/5/12     |
| Richie Polis                        | P493             | 12/27/12    |
| Trent Poltronetti                   | P494             | 11/16/12    |
| Brad Polvorosa                      | P495             | 11/27/12    |
| Robert Ponting                      | P496             | 11/27/12    |
| Lubomir Popov                       | P497             | 11/27/12    |
| Chris Posch                         | P498             | 11/19/12    |
| Robert Pousman                      | P499             | 11/16/12    |
| J-C Poussin                         | P500             | 11/16/12    |
| Carol Prager                        | P501             | 11/13/12    |
| Sebastien Praly                     | P502             | 11/16/12    |
| Reco Prianto                        | P503             | 11/28/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Matthew Price                       | P504             | 11/29/12    |
| Noelani Price                       | P505             | 11/25/12    |
| Lisa Priestley                      | P506             | 11/30/12    |
| Sherry Prince                       | P507             | Unknown     |
| Adrien Pritchard                    | P508             | 11/28/12    |
| Jacob Pritchett                     | P509             | 12/3/12     |
| Ingeborg Prochazka                  | P510             | 11/23/12    |
| David Procter                       | P511             | 11/17/12    |
| Ken Prosser                         | P512             | 11/16/12    |
| Allen Purdy                         | P513             | 11/20/12    |
| Randall Putz                        | P514             | 11/27/12    |
| John Quaglia                        | P515             | 11/18/12    |
| Betsy Quinn                         | P516             | 11/28/12    |
| David Quintel                       | P517             | 11/28/12    |
| Ken Raleigh                         | P518             | 11/27/12    |
| Phil Ralph                          | P519             | 12/3/12     |
| Vivek Raman                         | P520             | 11/17/12    |
| Linda Rappoport                     | P521             | Unknown     |
| Linda Rappoport                     | P522             | Unknown     |
| Rick Reed                           | P523             | 11/19/12    |
| Shane Reed                          | P524             | 12/4/12     |
| Gary Reents                         | P525             | 11/16/12    |
| Doug Reynolds                       | P526             | 11/27/12    |
| Brian Rhoades                       | P527             | 11/28/12    |
| Rebecca Rhodes                      | P528             | 11/19/12    |
| Roy Richardson                      | P529             | 11/28/12    |
| Todd Richardson                     | P530             | 12/3/12     |
| Eric Richter                        | P531             | 11/16/12    |
| Jean Ridgway                        | P532             | Unknown     |
| Michael Riepe                       | P533             | 11/30/12    |
| Julie Riklin                        | P534             | 11/28/12    |
| Jim Riva                            | P535             | 12/3/12     |
| Keli Roberts                        | P536             | 11/16/12    |
| Philip Roberts                      | P537             | 11/30/12    |
| Greg Robertson                      | P538             | 11/18/12    |
| Jeanne Robertson                    | P539             | 11/30/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Jim Robertson                       | P540             | Unknown     |
| Rob Robins                          | P541             | 12/3/12     |
| Frank Romagnano                     | P542             | 11/19/12    |
| Charles Romano                      | P543             | 11/16/12    |
| Gaspar Ronda, Jr.                   | P544             | 11/27/12    |
| Jeff Rormell                        | P545             | 11/18/12    |
| Michael Rose                        | P546             | 11/27/12    |
| Stewart Ross                        | P547             | 11/17/12    |
| Chris Rosset                        | P548             | 11/19/12    |
| Marc Rossi                          | P549             | 11/16/12    |
| Robin Routh                         | P550             | Unknown     |
| Gary Rudolph                        | P551             | 11/17/12    |
| Eric Russell                        | P552             | 12/2/12     |
| Chris Russo                         | P553             | 11/19/12    |
| Bonnie Sachs                        | P554             | Unknown     |
| Scott Sandine                       | P555             | 11/16/12    |
| Gerado Sandoval                     | P556             | 11/27/12    |
| Daniel Santos                       | P557             | 11/27/12    |
| Jeff Santucci                       | P558             | 12/3/12     |
| Joseph Satriano                     | P559             | 11/27/12    |
| Jason Saunders                      | P560             | 11/27/12    |
| Justin Savage                       | P561             | 11/26/12    |
| Rodolfo Sayson                      | P562             | 11/19/12    |
| Scheuer, No First Name              | P563             | Unknown     |
| Ernst Schmidt                       | P564             | 11/16/12    |
| Martin Schmidt                      | P565             | 11/20/12    |
| Wayne Schroeder                     | P566             | 11/27/12    |
| Alyce Schwartz                      | P567             | 10/2012     |
| Rich Schwerin                       | P568             | 11/16/12    |
| Jerry Scribner and Penny Scribner   | P569             | 11/25/12    |
| Ray Scruggs                         | P570             | 12/2/12     |
| Rob Seltzer                         | P571             | 11/27/12    |
| Skip Shaputnic                      | P572             | 11/27/12    |
| Dustin Sharp                        | P573             | 11/16/12    |
| Edward Sharp                        | P574             | 11/16/12    |
| Curt Shelp                          | P575             | 11/18/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Brendan Shepherd                    | P576             | 11/16/12    |
| Ron Shevock                         | P577             | 11/20/12    |
| Dorea Shoemaker                     | P578             | 11/28/12    |
| Jack Short                          | P579             | 12/3/12     |
| Joel Shrock                         | P580             | 11/27/12    |
| Marc Siddens                        | P581             | 11/16/12    |
| Tom Siebert                         | P582             | Unknown     |
| Norman Simmonds                     | P583             | Unknown     |
| Dash Sinclair                       | P584             | 11/26/12    |
| Paul Skilbeck                       | P585             | 11/16/12    |
| Alex Smith                          | P586             | 11/27/12    |
| Dave Smith                          | P587             | 11/27/12    |
| Garrett Smith                       | P588             | 11/16/12    |
| Smith                               | P589             | Unknown     |
| Zachary Smith                       | P590             | 11/16/12    |
| Jordan Smoke                        | P591             | 11/18/12    |
| Michael Snead                       | P592             | 11/27/12    |
| Evan Sollberger                     | P593             | Unknown     |
| Barbara Sommer                      | P594             | Unknown     |
| Mike Sooder                         | P595             | 11/27/12    |
| Emi Soroka                          | P596             | Unknown     |
| Mari Soroka                         | P597             | Unknown     |
| Roxanne Soto                        | P598             | 11/28/12    |
| R. Spier                            | P599             | Unknown     |
| Jill Sprance                        | P600             | 11/18/12    |
| David St Germain                    | P601             | 12/3/12     |
| Jesse Stafford                      | P602             | 11/18/12    |
| Kevin Starr                         | P603             | 11/18/12    |
| Dean Stepper                        | P604             | 11/28/12    |
| Rene Sterental                      | P605             | 11/19/12    |
| ELana Sterling                      | P606             | 11/30/12    |
| Camerson Stewart                    | P607             | 11/26/12    |
| Steve Stewart                       | P608             | 11/19/12    |
| Jeff Stokes                         | P609             | 12/3/12     |
| Sherrie Stolarik                    | P610             | 10/27/12    |
| Karen Stone                         | P611             | Unknown     |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Eric Storne                         | P612             | 11/16/12    |
| Jason Strnad                        | P613             | 11/17/12    |
| Ted Stroll                          | P614             | 11/13/12    |
| Rompcore Group                      | P615             | 11/13/12    |
| Alan Sturm                          | P616             | 11/17/12    |
| Johnny Sulecki                      | P617             | 11/27/12    |
| Kevin Sumida                        | P618             | 11/27/12    |
| Lauren Swinkey                      | P619             | 11/18/12    |
| Tom Switzer                         | P620             | 11/30/12    |
| Paul Sylveser                       | P621             | 11/27/12    |
| Grant Taggart                       | P622             | 11/17/12    |
| Travis Taylor                       | P623             | 12/4/12     |
| Peter Tennessen                     | P624             | 11/16/12    |
| Julie Terry                         | P625             | 11/28/12    |
| Mark Thanassi                       | P626             | 11/16/12    |
| Nick Thelen                         | P627             | 11/16/12    |
| Thomas Theriault                    | P628             | 11/16/12    |
| Thomas Theriault                    | P629             | 11/16/12    |
| Eric Thomas                         | P630             | 11/16/12    |
| Jim Thomas                          | P631             | 11/26/12    |
| Aaron Thompson                      | P632             | 11/28/12    |
| John Thompson                       | P633             | 11/16/12    |
| Michael Thompson                    | P634             | 12/3/12     |
| Anthony Tilley                      | P635             | 11/27/12    |
| Norman Tinio                        | P636             | 11/29/12    |
| Matt Todd                           | P637             | 11/26/12    |
| Josh Tonnissen                      | P638             | 11/17/12    |
| Wayne Toutges                       | P639             | 11/17/12    |
| Rob Tresun                          | P640             | Unknown     |
| Joel Trice                          | P641             | 11/28/12    |
| Tod Turley                          | P642             | 11/17/12    |
| Dan Turner                          | P643             | 11/17/12    |
| Mike Udkow                          | P644             | Unknown     |
| Ken Uekert                          | P645             | 11/16/12    |
| Mike Ulyatt                         | P646             | 11/16/12    |
| Doug Urbach                         | P647             | 11/18/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Aaron Valdez                        | P648             | 11/16/12    |
| Scott Valentine                     | P649             | 11/28/12    |
| Jacob Valenzuela                    | P650             | 11/19/12    |
| Jacob Valenzuela                    | P651             | 11/27/12    |
| Jason Van Horn                      | P652             | 11/26/12    |
| Mike Vandeman                       | P653             | 10/15/12    |
| Raak Veblen                         | P654             | 11/28/12    |
| Frank Vento                         | P655             | 11/28/12    |
| Carlos Verdugo                      | P656             | 11/30/12    |
| Noel Vernon                         | P657             | Unknown     |
| Noel Vernon                         | P658             | Unknown     |
| Arthur Veyna                        | P659             | 11/27/12    |
| Julia Violich                       | P660             | 11/18/12    |
| Geno Viscuso                        | P661             | 11/26/12    |
| Scott von Eschen                    | P662             | 11/28/12    |
| Jim Vreeke                          | P663             | 11/27/12    |
| Richard Vye                         | P664             | 12/4/12     |
| Robert Wagner                       | P665             | 11/29/12    |
| Scott Whal                          | P666             | 11/18/12    |
| William Waldren                     | P667             | 11/18/12    |
| Chris Walker                        | P668             | 11/19/12    |
| Robert Walker                       | P669             | 11/27/12    |
| Alan Walls                          | P670             | 11/28/12    |
| Andrew Walsh                        | P671             | 11/16/12    |
| Jeri Walz                           | P672             | 12/3/12     |
| Penelope Ward                       | P673             | 12/4/12     |
| Vickie Ward                         | P674             | Unknown     |
| Mike Wardenburg                     | P675             | 11/28/12    |
| Kenneth R. Warren                   | P676             | 11/16/12    |
| Sean Warriner                       | P677             | 11/16/12    |
| Boyd Watkins                        | P678             | 11/27/12    |
| Rebecca Watson                      | P679             | 11/19/12    |
| T. Larry Watts                      | P680             | 10/27/12    |
| Clark Weber                         | P681             | 11/16/12    |
| Eric Webster                        | P682             | 11/17/12    |
| Orion Weihe                         | P683             | 12/4/12     |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Matt Weis                           | P684             | 11/17/12    |
| Ann Weiss                           | P685             | 12/1/12     |
| Jeanette Welling                    | P686             | 11/7/12     |
| Lawrence West                       | P687             | 11/17/12    |
| Barbara White                       | P688             | 11/20/12    |
| Donna Williams                      | P689             | 12/3/12     |
| Fred Williams                       | P690             | 11/28/12    |
| Megan Williams                      | P691             | Unknown     |
| Paul Wintermute                     | P692             | 11/16/12    |
| Rose Wood                           | P693             | 11/26/12    |
| Patrick Woods                       | P694             | 11/27/12    |
| Yvette Woodward                     | P695             | 11/27/12    |
| Chris Wyatt                         | P696             | 11/27/12    |
| Roland Wyler                        | P697             | 11/27/12    |
| Robert Yates                        | P698             | 11/17/12    |
| Zenon Zapack                        | P699             | 11/16/12    |
| Michael Ziegler                     | P700             | 11/27/12    |
| Helene Zimmerman                    | P701             | Unknown     |
| Robert Zwissler                     | P702             | 11/16/12    |
| Thomas Becker                       | P703             | 11/28/12    |
| Raymi Borunda                       | P704             | 11/30/12    |
| Paul Caine                          | P705             | 11/29/12    |
| David Camp                          | P706             | 11/29/12    |
| Bonnie Campbell                     | P707             | 11/27/12    |
| Joe Carpenter                       | P708             | 11/27/12    |
| Alex Chamberlin                     | P709             | 11/21/12    |
| Tuan Diep                           | P710             | 11/16/12    |
| Simon Dunne                         | P711             | 12/6/12     |
| Bryan Fernandes                     | P712             | 11/28/12    |
| Richard Garner                      | P713             | 11/17/12    |
| Mark Gomez                          | P714             | 11/19/12    |
| Phil Granger                        | P715             | 11/28/12    |
| David Hanzel                        | P716             | 11/27/12    |
| Craig Hartley                       | P717             | 11/30/12    |
| Russell Henmi                       | P718             | 11/17/12    |
| Daggett Howard                      | P719             | 11/28/12    |

| <b>Table 2-1 List of Commenters</b> |                  |             |
|-------------------------------------|------------------|-------------|
| <b>Commenter</b>                    | <b>Letter ID</b> | <b>Date</b> |
| Lloyd Huff                          | P720             | 11/27/12    |
| Jim Hunsinger                       | P721             | 11/28/12    |
| Shannon Hunter                      | P722             | 12/8/12     |
| Keith Jansen                        | P723             | 11/27/12    |
| Shana Kaplan                        | P724             | 12/10/12    |
| Shana Kaplan                        | P725             | 11/18/12    |
| Derek Kishida                       | P726             | 11/27/12    |
| Lane Lawrence                       | P727             | 11/17/12    |
| Alex Luce                           | P728             | 11/19/12    |
| Scott MacIntyre                     | P729             | 12/3/12     |
| Sara Madison                        | P730             | 11/30/12    |
| Steve Mendoza                       | P731             | 11/17/12    |
| Henry Mitchell                      | P732             | 11/27/12    |
| Corey Mollet                        | P733             | 11/27/12    |
| Chris Napolitano                    | P734             | 12/3/12     |
| Erik Page                           | P735             | 11/30/12    |
| Scott Platt                         | P736             | 11/18/12    |
| Dean Pohlm                          | P737             | 12/5/12     |
| Robert Price                        | P738             | 11/28/12    |
| Judd Rummage                        | P739             | 12/5/12     |
| Stephen Ternlund                    | P740             | 11/28/12    |
| David Walker                        | P741             | 11/27/12    |
| Jeff Wayland                        | P742             | 11/19/12    |
| Hans Wolters                        | P743             | 11/27/12    |
| San-Ling Yu                         | P744             | 11/16/12    |

## 2.3 RESPONSES TO COMMENTS ON THE DRAFT PROGRAM EIR

As described above, this Final Program EIR contains responses to comments submitted on the Draft Program EIR. Master Responses are followed by responses to letters submitted by agencies, organizations, and individual persons. All comment letters are reproduced in their entirety in Volume 2 of this Final Program EIR.

### 2.3.1 MASTER RESPONSES

#### Master Response 1

#### Clarification Related to the Purpose and Intent of this Program EIR

Multiple public comments appear to misinterpret the intended purpose, scope, or use of a Program EIR. Also, multiple comments address whether a CSP road or trail should add or remove a particular recreational use or be more or less technically or physically challenging. Master Response 1 has been prepared to reiterate and clarify the purpose, scope, and use of the Program EIR and CSP's consideration of a decision to add or remove a use from an existing road or trail.

#### Purpose, Scope, and Use of the Program EIR

As discussed in Chapter 1, Introduction, of the Draft Program EIR, this document is a Program EIR prepared according to the State CEQA Guidelines, California Code of Regulations (CCR) Section 15168. A Program EIR may be prepared on a series of actions that can be characterized as one large project and are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. The proposed Process meets the criteria for use of a Program EIR as the means of CEQA compliance.

A Program EIR is programmatic in nature, i.e., it analyzes the potential environmental effects of an overall program and does not specifically analyze individual projects. When a Program EIR examines the overall effects of a proposed course of action, it can report on the approaches proposed to avoid adverse environmental effects, generally applicable environmental effects of the proposed action, and cumulative effects of the proposed action.

Importantly, no specific change-in-use proposal would be authorized with the certification of the Program EIR and approval of the proposed Process by CSP. Districts must consider each specific change-in-use proposal at an individual State Park unit as its own project under CEQA. According to the provisions of the State CEQA Guidelines Section 15168(c), a specific change-in-use proposal may be a "later activity" that is consistent with the proposed Process. In other words, no trail in the CSP system would be converted to multi-use as a result of certification of this Program EIR and approval of the proposed Process. Furthermore, not all trails proposed for a change-in-use would be converted through the Process evaluated in this Program EIR, because many existing trails are not conducive to multi-use.

As noted in CCR Section 15168(c) of the State CEQA Guidelines, the "later activities" (i.e., in this case, the specific change-in-use proposals) that are consistent with the proposed Process would be examined in light of the information in this Program EIR to determine whether an additional environmental document must be prepared for CEQA compliance. If CSP finds that, pursuant to CCR Section 15162 of the State CEQA Guidelines,

no new effects could occur or new mitigation measures would be required on a subsequent project, the activity can be approved as being within the scope of the project covered by this Program EIR. No new environmental documentation would be required, with the exception of a Notice of Determination (NOD), should CSP determine that a project is within the scope of the Program EIR. In this situation, CSP must incorporate all project requirements relevant to the proposed change in use and all feasible mitigation measures from the Program EIR into the later activity, as needed, to address significant or potentially significant effects on the environment.

If a subsequent project or later activity would have effects that were not examined in this Program EIR, CSP would prepare an initial study to determine the appropriate environmental document. If an additional environmental document is needed, whether it is a mitigated negative declaration or supplement to the Program EIR, the Program EIR can be used to simplify the task of preparing the follow-up environmental document by allowing CSP to focus on the issues that were not previously addressed in the Program EIR, as indicated in CCR Section 15168(d) of the State CEQA Guidelines.

The Program EIR evaluates the significant or potentially significant adverse effects on the physical environment resulting from implementation of the proposed Process, recognizing the use of environmental protection standards and features (see Section 3.6, Project Requirements and Change-in-Use Evaluation Process, of the Draft Program EIR) that are incorporated into the description of change-in-use proposals; describes feasible measures, if needed, to mitigate any significant or potentially significant adverse effects; and considers alternatives that may lessen one or more of the significant or potentially significant adverse effects.

As described in Chapter 3, Project Description, of the Draft Program EIR, Standard Project Requirements (SPRs) are applied to projects statewide at all park units, as required. Project-Specific Requirements (PSRs) are requirements that would be developed at the project level. PSRs are written for, and applied to, proposals based on specific actions unique to an individual project and/or area that are necessary to complete the project while protecting resources. They are design, construction, and management features developed as part of the Process and incorporated by the appropriate CSP District staff into the description of the change-in-use proposal. A design that avoids a resource specific to a park unit and is not covered by the SPR is an example of a potential PSR.

### **Adding or Removing a Particular Recreational Use**

Several comments address whether CSP should add or remove a particular road or trail use for a specific recreational purpose, such as adding technically challenging characteristics for users of a trail. The following response explains CSP's approach to review of proposed changes in use.

As discussed in Chapter 2, Executive Summary, of the Draft Program EIR, CSP proposes to implement the Process to facilitate the review of change-in-use proposals that would add uses to or remove uses from existing recreational roads and trails in the State Park System. Also, the incorporation of additional, detailed SPRs into the Process through the Program EIR's evaluation is also intended to apply environmental protection features to change-in-use proposals more consistently. CSP proposes to implement the Process throughout the State Park System, with the exception of off-highway motorized vehicle recreation uses.

The Draft Program EIR analyzes the proposed Process and the overall environmental effects of the changes in uses that would qualify for approval under the Process. The Program EIR does not assess whether or not a specific CSP road or trail should be multi-use or should add or remove a particular recreational use. Instead, this document analyzes the potentially significant impacts of the adoption and implementation of the Process by CSP.

No preferential treatment by CSP would be provided to any recreational use types as a result of implementing the proposed Process. The proposed Process would be an objective evaluation tool to assess change-in-use proposals that modify roads and trails. Therefore, all change-in-use requests would go through the same objective process and evaluation. Consistent with the mandate of the California Recreational Trails Plan, CSP provides for broad trail access, rather than focusing on individual user groups.

As noted in the Draft Program EIR, the Road and Trail Change-in-Use Evaluation Process is specifically intended to achieve the following CSP objectives (page 3-8 of the Draft Program EIR):

- ▲ to implement the CSP Trail Policy, including to provide multi-use trails and trail connectivity;
- ▲ to evaluate appropriate proposals for road and trail change-in-use projects (i.e. add uses to or remove uses from existing roads and trails) in CSP units that can be implemented in a manner that avoids or clearly mitigates potential significant effects on the environment;
- ▲ to provide an objective and consistent evaluation tool and process to inform decision-making while recognizing the diversity of resources and users at each park unit; and
- ▲ to ensure that these objectives are achieved in an open and transparent process.

As stated on page 3-1 of the Draft Program EIR, “Any change in use must be consistent with the objective of natural and cultural resource protection, along with the objectives of providing recreation opportunities for California residents, visitors, and user groups.” The decision to add or remove a particular recreational use on an existing CSP road or trail would be the responsibility of the District within which the project is located. While the input of recreation users and groups is important and considered by the District, the decision would be based on an objective evaluation of the proposal; environmental data, laws, and regulations; and implementation of the CSP Trail Policy.

### Requests for Technically Challenging Roads and Trails

Some comments request technically and/or more physically challenging trails within CSP Units. These types of requests are outside of the scope of this Program EIR and are inconsistent with the policies of CSP (Public Resources Code [PRC] Sections 5001.6, 5019.53, 5019.62; CSP DOM 0317.1.2-Attractions in Themselves; CSP DOM 0317.1-Visitor Recreational Uses). Recognizing these policies, technically challenging and high-speed trails would be inconsistent with the goals of CSP for trail use and access. Because such proposals are inconsistent with CSP policies, they are not proposed by CSP and are not addressed in this Program EIR.

Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR, is cross-referenced in the following response to comments: O1-1, O1-1, O1-12, O1-13, O2-16, O2-21, O2-23, O2-28, O2-31, O2-35, O4-2, O4-3, O4-4, O4-5, O4-6, O4-8, O4-16, O4-17, O4-18, O4-19, O5-1, O5-5, O5-16, O8-5, O8-9, O8-10, O12-1, O13-1, O14-1, O14-3, P1-3, P3-1, P32-1, P33-1, P34-1, P40-1, P45-1, P49-2, P76-1, P80-2, P80-3, P80-4, P83-2, P83-3, P90-1, P91-1, P96-1, P96-2, P99-2, P125-1, P128-1, P145-2, P147-1, P148-1, P150-3, P150-4, P152-1, P153-1, P153-2, P153-3, P153-4, P157-1, P161-1, P170-1, P179-1, P183-1, P187-1, P190-1, P190-8, P190-13, P192-1, P192-2, P192-3, P192-6, P209-1, P212-1, P221-1, P226-1, P226-2, P226-3, P226-5, P226-7, P260-1, P264-1, P268-1, P268-2, P268-6, P272-1, P281-1, P281-27, P281-29, P281-6, P293-2, P319-1, P319-3, P319-4, P332-1, P332-11, P332-2, P332-3, P332-7, P332-8, P347-2, P347-5, P358-1, P371-2, P374-1, P386-1, P386-2, P386-5, P415-1, P420-1, P423-1, P428-1, P433-1, P437-1, P439-3, P451-1, P456-12, P456-14, P465-3, P501-1, P507-1, P510-1, P532-1, P540-1, P550-1, P550-4, P554-1, P567-1, P569-1, P582-1, P583-1, P589-1, P594-1, P596-1, P597-1, P599-1, P606-1, P610-1, P611-1, P625-1, P640-1, P645-1, P659-1, P660-2, P668-2, P672-1, P673-1, P688-3, P689-4, P691-1, P701-1.

**Master  
Response 2****Comments Related to Safety on Multi-Use Trails**

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Several commenters express concern regarding trail safety and trail user conflict on existing trails and those that could be subject to a change-in-use proposal.

**Concerns Regarding Trail Safety or Trail Use Conflict**

As discussed in Section 5.2.8 of the Draft Program EIR, the topic of trail safety (i.e. use-appropriate trail design, trail crossings of roadways, or similar subjects relevant to the physical standards of trail design) is an environmental impact topic within the purview of CEQA for which a significance determination is made and feasible mitigation measures or alternatives defined, if a significant impact is identified. Safe trail design is achieved with use-appropriate design features. Issues related to use-appropriate design of trails, trail safety, and risks of accidents are evaluated in Section 4.9, Hazards and Hazardous Materials, of the Draft Program EIR. Impact 4.9-4 (p.4.9-12 of the Draft Program EIR) explains that any qualifying change-in-use project would require use-appropriate trail design that is consistent with CSP standards and BMPs. The Project Evaluation Form (provided in Appendix E of the Draft Program EIR) includes specific use-appropriate design criteria for recreational user groups. Design features include tread width, passing space dimensions, sight distance, speed control, turning radius, surface texture, signage, and enforcement.

Per PRC Sections 5001.6, 5019.53, 5019.62 and CSP DOM 0317.1.2, CSP trails are not intended for or appropriate as active recreation attractions on their own (e.g., for high-speed rides, adventurous travel, demonstration of technical skills, or competitive events), but as a means of providing public access to the natural, scenic, cultural and ecological resources of the State Park System, CSP trails benefit from considering design criteria that specifically aim to reduce conflict among trail users. The Trail Use Conflict Study proposes a *Checklist for Low-Conflict Multi-Use Trail Design* that includes such criteria (see Table A-1 in Appendix C). While many of these criteria are already in use by CSP, the checklist focuses on the key issues related to reducing trail use conflict, such as mountain bike speed, sight distance, tread width and passing space. CSP would continue to incorporate use-appropriate, low-conflict, multi-use design features into State Park System trails, as changes in use are proposed (see page 8-4 of the Draft Program EIR).

Several comments address trail use conflict concerns. As discussed in Section 5.2.8 of the Draft Program EIR, trail use conflict is not, by itself, a physical environmental impact (i.e., it is not subject to CEQA analysis). However, CSP recognizes the important topic of trail use conflict and the degree of concern expressed by the public. Therefore, CSP conducted an extensive research effort leading up to the preparation of this Program EIR to gather existing information and consult with trail managers regarding the current state of knowledge about multi-use conflicts. Chapter 8, Trail Use Conflicts, of the Draft Program EIR summarizes the results of the trail use conflict research. Appendix C of the Draft Program EIR includes the complete technical report to help provide information for CSP's decision-making about the proposed Process. The results of the research indicate that the orientation, perception, attitude, recreation experience expectations, and behavior of users are major factors in generating concerns and complaints about trail conflict. Although it tends to be social and perceptual, rather than represented by significant physical evidence, trail use conflict is a very real issue for almost all multi-use trail managing organizations consulted during the research effort (Alta 2011).

A strong body of study and informed opinion documents the importance of trail use conflict as a social issue (Alta 2011). CEQA mandates the evaluation of effects of a project on the physical environment. Social and economic effects are not considered effects on the environment, as noted in CCR Section 15064(e) and 15131(a)

of the State CEQA Guidelines. Although the potential for conflicts between trail users is an important topic, which is why it was discussed in detail in the Draft Program EIR, it is a social issue that does not constitute, by itself, an effect on the physical environment. CSP believes that a safer trail, with proper engineering and safety features, would reduce the potential for conflict among users, as discussed in Master Response 3. Therefore, consistent with CEQA requirements, a significant environmental impact conclusion regarding the social concern of potential trail conflicts would not be appropriate in the Program EIR.

### **Implementation of Standard Project Requirements (SPRs) and Enforcement of Trail Regulations under the Proposed Process**

Commenters ask how SPRs would be implemented under the proposed Process, particularly in regards to enforcement and safety. The proposed Process includes a comprehensive set of steps that serve to identify the necessary SPRs, incorporate them into the design of a change-in-use proposal, and manage and monitor their implementation. A detailed explanation of the proposed Process is contained in Section 3.6 of the Draft Program EIR. Please also refer to Exhibit 3.2 in that section for the flowchart that illustrates the proposed Process. Because the SPRs are required to be defined as part of the “project description” of a change-in-use proposal, a proposal cannot be approved without the SPRs that are necessary to achieve use-appropriate design and protection of resources. Steps in the Process that help ensure implementation of SPRs include the Road and Trail Log (which identifies existing conditions and resource needs), Road and Trail Use Change Survey and Construction Work Log (which identify the necessary SPRs, including input from local user groups, and present a recommendation regarding whether to approve the proposal), Project Evaluation Form (which assesses the consistency of the proposal with the Program EIR and discusses whether/how significant environmental effects are avoided by SPRs and PSRs), and Construction Work Plan (which prescribes the construction and management implementation approach for the proposal, including its SPRs). As is evident in Section 3.6 of the Draft Program EIR, the proposed Process is detailed with several safeguards to ensure that needed SPRs are identified and implemented to avoid significant effects on the environment.

In addition, the proposed Process includes an Adaptive Use Management (AUM) provision as an SPR (SPR GEN-9). This provision is designed to require the monitoring and, if necessary, correction of environmental degradation resulting from trail use. AUM defines performance standards that a change-in-use proposal must meet to adequately protect the environment over time. CSP District staff would conduct the monitoring in conjunction with their regular management duties. If monitoring identifies a resource condition that is not consistent with the performance standards, the District would define and implement the appropriate corrective action(s). The AUM requirement provides an additional safety net to ensure that significant environmental effects are avoided.

Several comments ask how change-in-use road or trail regulations would be enforced. Rules for road and trail use are enforced by State Park rangers as a part of their normal daily duties. Rangers issue citations if illegal trail activity is observed. The proposed Process would not change the existing enforcement procedures or frequency of patrol. Rather, enforcement on roads and trails subject to a change in use would be integrated into the normal, existing framework of ranger operations. It is also CSP’s desire to partner with road and trail user groups, whenever feasible, to form volunteer patrols to assist road and trail users and report illegal activities to rangers, if needed. Volunteer patrols could include all user groups and would vary from park to park, depending on arrangements between the local user organizations and the District personnel.

Master Response 2, Comments Related to Safety on Multi-Use Trails, is cross-referenced in the following response to comments: O2-2, O2-4, O2-5, O2-8, O2-9, O2-10, O2-12, O2-13, O2-27, O2-31, O2-35, O2-37, O2-40, O7-3, O8-6, O9-4, O10-3, O10-7, O11-1, P1-1, P2-1, P9-7, P22-1, P26-1, P29-1, P32-2, P52-1, P54-2, P58-2, P65-1, P80-4, P83-1, P90-1, P91-1, P94-1, P96-2, P99-1, P99-2, P101-4, P128-1, P140-1, P145-1, P147-1, P150-3, P150-4,

P151-1, P153-1, P153-3, P157-1, P161-1, P179-1, P183-1, P192-2, P192-3, P212-1, P226-1, P226-2, P260-1, P268-1, P268-5, P272-1, P281-17, P281-26, P281-4, P292-1, P319-1, P319-2, P332-4, P332-5, P332-6, P337-1, P347-1, P347-2, P347-4, P353-1, P358-1, P358-2, P386-2, P386-3, P428-1, P437-1, P451-1, P465-1, P465-2, P465-4, P487-1, P490-1, P501-1, P501-2, P507-1, P510-1, P521-1, P522-1, P532-3, P540-1, P545-1, P550-3, P554-1, P567-2, P569-3, P569-4, P582-1, P583-1, P589-1, P594-1, P596-1, P597-1, P599-1, P606-1, P610-1, P611-1, P640-1, P672-1, P673-1, P674-1, P686-1, P691-1.

## Master Response 3

### Comments Related to Trail Design to Accommodate New Recreational Uses

Several commenters express concern regarding trail design, volunteer trails, and the potential for under-engineering or over-engineering roads or trails slated for change-in-use under the proposed Process.

#### An Overview of CSP Use-Appropriate Trail Design

The State's trail systems must be designed to utilize resources in ways that benefit all types of non-motorized trail uses. This mandate is intended to provide for broad trail access, rather than focusing on individual user groups. The increased sharing of resources sometimes creates friction between the diverse user groups vying for trail space. The California Recreational Trails Plan acknowledges that a certain amount of friction between trail users can occur and therefore, focuses on design, planning, and communication to minimize the differences and optimize the benefits derived from these precious resources (page 3-1 of the Draft Program EIR).

One of the goals of the California Recreational Trails Plan most relevant to the proposed Process is to "provide the maximum opportunities for the public use of trails by encouraging the appropriate expansion of multi-use trails" (CSP 2002; 25). The proposed Process would essentially implement some of the action guidelines for this goal, including establishment of "a public process, coupled with scientific data and documentation, for determining use groups appropriate for trails within State Parks" and "user groups to help land managers make informed decisions regarding trail designation and design" (e.g. overall user safety, levels of public use, resource impacts, and needed and available monitoring, patrol and enforcement) (CSP 2002; 25).

Roads and trails qualifying for a change-in-use through the proposed Process would be required to implement SPRs, which are CSP system-wide environmental protection measures and features applied to a project's design, construction process, or operation that are implemented with the objective of avoiding significant impacts or maintaining them at less-than-significant levels (see Section 3.6 of the Draft Program EIR). The change-in-use projects may also include Project-Specific Requirements (PSRs), which are project-specific design, construction, or operational measures tailored to the special characteristics of an individual change-in-use proposal. Change-in-use projects qualifying for approval under the proposed Process would also be subject to Adaptive Use Management (AUM) procedures, which involve: establishing baseline use conditions for the change-in-use proposal; implementing monitoring and management responses to ensure that unanticipated environmental consequences would not cause significant impacts; and to correct, if necessary, user-created road or trail issues (page 2-2 of the Draft Program EIR). Together, these elements inform CSP trail design under the proposed Process.

#### Volunteer Trails

One of the reasons to consider a change-in-use request may be to reduce the volunteer trails within a park unit that are created by users in unsuitable locations. Volunteer trails are unauthorized trails that have been created by repeated use or unplanned actions of trail users. Because the volunteer trails are not planned by CSP or designed for the intended use, they may create erosion problems and encourage other users to use a trail that is

not designed or built to safely accommodate users and protect resources. For example, trail users who may not be allowed to use certain trails within a park unit may find or create volunteer trails to get around this restriction, use a shortcut, or create a more challenging route. By considering use-appropriate design and authorizing use by a new user group to an existing road or trail through the proposed Process, CSP could modify an existing facility to encourage users to relocate unauthorized use to a properly designed and designated road or trail. This would also allow CSP to eliminate and restore volunteer trails and discourage future volunteer trails from being created. Ultimately, channeling users away from volunteer trails and onto properly designed, designated, and sustainable trails and restoring volunteer trails to natural conditions would result in environmental benefits.

### **Comments Related to under-Engineering or Over-Engineering of Trails under the Process**

Several comments express concern that the Process would result in under-engineering or over-engineering of trails. When a new recreational use is added or removed from an existing CSP road or trail, CSP is required to assess whether safety and environmental protection standards and features have been or need to be incorporated into design of the trail. All multi-use trails within the CSP road and trail system have required incorporation of use-appropriate trail design consistent with CSP standards and requirements and the existing framework of statewide and regional legal and regulatory requirements. This would still apply under the proposed Process. In some instances, physical alteration of a road or trail may be unnecessary for changes in use. However, CSP is still required to assess the need for any physical alterations for a proposed change-in-use project under this Process.

The detailed set of steps included in the proposed Process would ensure that the degree of engineered features to be constructed would be appropriate for the proposed uses and the trail's environmental conditions. As described in Section 3.6 of the Draft Program EIR, CSP assesses existing resource conditions, conducts a detailed survey of a trail proposed for a change in use, gathers input from trail user groups, defined potential SPRs with a Construction Work Log, conducts environmental evaluation in light of the information within this Program EIR, and prepares a detailed cost estimate. Taken together, these steps represent a comprehensive approach to the definition of the appropriate degree of engineered trail features.

Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses, is cross-referenced in the following response to comments: O2-12, O2-18, O2-9, O4-19, O5-8, O5-9, O5-11, O7-3, O8-6, O9-3, O11-1, O13-2, O14-1, P3-1, P22-1, P29-1, P32-2, P80-3, P83-2, P83-3, P99-1, P99-2, P101-4, P147-1, P153-1, P153-2, P153-4, P157-1, P170-1, P179-1, P183-1, P192-2, P192-4, P192-5, P212-1, P226-1, P226-2, P226-6, P239-1, P260-1, P281-4, P281-17, P281-19, P281-26, P319-1, P319-2, P332-6, P337-1, P347-2, P353-1, P358-1, P358-2, P371-2, P386-2, P386-3, P437-1, P465-6, P501-1, P501-2, P501-4, P510-1, P522-1, P522-4, P524-2, P529-1, P531-2, P532-1, P533-4, P540-1, P545-3, P554-1, P567-3, P569-2, P582-1, P583-1, P589-1, P594-1, P596-1, P597-1, P599-1, P606-1, P610-1, P611-1, P638-1, P640-1, P645-1, P661-1, P672-1, P673-1, P674-1, P688-2, P691-1, P695-1.

#### **Master Response 4**

#### **Comments Related to Limits of Development in State Parks That Are Considered "Attractions In Themselves."**

Commenters expressed interest in design features that would increase the attraction of trails for use. As stated in PRC Section 5019.53, "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." Features that could constitute "attractions in themselves" include facilities for adventurous activities,

demonstration of technical skill, entertainment activities, or competitive events. Such features are not consistent with CSP trail policies.

As discussed in Section 4.14, Recreation, of the Draft Program EIR, change-in-use projects that would qualify for the proposed Process would not be “Attractions in Themselves” because CSP trails are intended to provide access to the natural and/or cultural resources for which a park unit was established. However, the concept of “Attractions in Themselves” as stated in CSP Departmental Operation Manual (DOM) 0317.1.2 (see p. 14-3 of the Draft Program EIR), is an important consideration in CSP recreation planning, and it is important to understand the distinction between CSP trails and these attractions. Section 4.14 of the Draft Program EIR discusses the concept of “Attractions in Themselves” as it relates to CSP:

“Change-in-use projects that would qualify for the proposed Process would not be “Attractions in Themselves” because CSP trails are intended to provide access to the natural and/or cultural resources- for which a park unit was established, as opposed to an attraction such as a destination restaurant, sports complex, or trail facility intended for the purpose of testing skills or providing adventure experiences; however, the concept of “Attractions in Themselves” as stated in the DOM is provided below, because it is an important consideration in CSP recreation planning, and it is important to understand the distinction between CSP trails and these attractions.

A fundamental purpose of the State Park System is to provide opportunities for enjoyment of park natural resource values. The Department is committed to providing appropriate, high quality opportunities to enjoy parks. However, some types of facilities used by the public do not require a state park setting.

“Attractions in themselves” are prohibited in units classified as State Parks, State Seashores or in coastal stretches designated State Seashore by the Legislature (PRC Sections 5001.6, 5019.53 and 5019.62). It is sometimes difficult to make the distinction between those facilities that assist visitors in enjoying a park’s resource values and those facilities that are attractions in themselves. Attractions in themselves are facilities that a portion of the public uses without experiencing the other opportunities for which a park was established and planned. These types of facilities, such as community centers, team sports complexes or “destination”-type restaurants, are not normally associated with resource-based outdoor recreation, do not depend on location within a park, and are often available to the public within a reasonable distance outside the park. These types of facilities can usually be accommodated outside a park unit, often on private land.

Attractions in themselves can have the following impacts:

- ▲ Reduce parkland available for resource-based outdoor recreational uses;
- ▲ Displace park users;
- ▲ Reduce the options and area for development of park facilities;
- ▲ Reduce the unit’s sense of place;
- ▲ Reduce open space and habitat or restorable habitat acreage;
- ▲ Consume staff time for General Plan amendments, contracts and overseeing improvements; and
- ▲ Divert scarce resources away from necessary park facilities.

It is recognized that some park facilities either acquired or developed in the past may be considered to be attractions in themselves. These facilities typically have long-established use and enjoyment as such and may be valued features of the State Park System.” In some cases, these uses were present on the land when it was acquired by CSP.

The Draft Program EIR text has been revised to add additional clarifying statements, shown above.

As analyzed in Impact 4.14-2 of the Draft Program EIR, change-in-use projects would not create “attractions in themselves.” Therefore, change-in-use projects approved through the proposed Process would not be designed to stimulate demand for adventure-oriented or technical-skill oriented trail experiences. This approach is consistent with existing CSP operational directives (DOM 3.1.1.2) (CSP 2012: 4.14-7). CSP’s intent is to offer a means for visitors to access park resources via trails. Therefore, CSP road or trail projects that qualify for approval under the Process would be designed to offer a pace of travel by all users consistent with the enjoyment and appreciation of park resources.

Master Response 4, Comments Related to Limits of Development in State Parks That Are Considered “Attractions In Themselves,” is cross-referenced in the following response to comments: O14-2, O4-7, O5-15, O5-16, P3-2, P4-1, P8-2, P10-1, P20-2, P23-1, P26-1, P39-2, P48-2, P51-2, P54-2, P58-2, P70-2, P72-2, P77-2, P78-1, P80-5, P84-1, P86-1, P95-2, P100-2, P101-3, P103-2, P106-2, P110-2, P111-1, P114-2, P115-2, P116-2, P116-2, P129-2, P131-2, P132-2, P136-2, P142-2, P158-2, P165-2, P175-2, P184-2, P185-2, P189-2, P191-2, P198-2, P199-2, P201-2, P214-2, P226-2, P226-6, P230-2, P232-2, P233-2, P235-2, P241-2, P245-2, P246-2, P250-2, P277-2, P278-2, P281-18, P281-25, P283-1, P284-2, P288-2, P290-2, P297-2, P299-2, P300-2, P308-2, P311-2, P313-2, P318-2, P320-2, P321-2, P322-2, P324-2, P336-2, P341-2, P343-2, P344-2, P347-6, P357-2, P360-2, P364-2, P366-2, P367-2, P370-2, P375-1, P376-2, P377-2, P378-2, P379-2, P380-2, P383-2, P384-1, P387-2, P391-2, P395-2, P396-2, P399-2, P402-1, P404-2, P405-2, P409-2, P410-2, P411-2, P416-1, P417-2, P419-2, P421-2, P422-2, P434-2, P436-1, P438-1, P439-4, P442-2, P443-2, P444-2, P445-2, P446-2, P447-2, P449-2, P454-1, P455-2, P456-16, P465-2, P465-4, P466-2, P467-2, P470-2, P474-2, P476-2, P483-1, P486-2, P488-2, P489-2, P497-2, P500-2, P505-2, P508-2, P509-2, P512-2, P513-1, P515-2, P516-2, P518-2, P520-2, P523-2, P525-2, P527-2, P529-2, P530-2, P533-3, P537-2, P538-2, P548-2, P549-2, P551-2, P552-2, P555-2, P557-2, P558-2, P566-2, P568-2, P571-2, P572-1, P573-2, P577-2, P578-2, P585-2, P588-2, P592-2, P593-1, P600-1, P603-2, P607-2, P614-3, P616-2, P619-2, P620-2, P621-2, P626-2, P627-2, P639-2, P641-2, P642-2, P646-2, P650-2, P670-2, P683-2, P684-2, P685-2, P687-2, P696-2, P699-2, P700-2.

## A: AGENCIES (FEDERAL, STATE, AND LOCAL)

| Response<br>A1 | James Herota, Staff Environmental Scientist<br>Central Valley Flood Protection Board<br>10/22/12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| A1-1           | <p>The potential for existing CSP units within the jurisdiction of the Central Valley Flood Protection Board (Board) and the potential need for encroachment permit or Title 23 CCR requirements are noted for consideration during project review. Although the Board and its permit requirements are not specifically referenced in the Program EIR, any applicable environmental laws and regulations that apply to a project not covered under this Program EIR would be addressed through incorporation of Project Specific Requirements (PSRs) for that project. As described in Section 3.6, Project Requirements and Change-In-Use Evaluation Process, of the Draft Program EIR, PSRs are written for, and applied to, proposals based on specific actions unique to a project and/or area that are necessary to complete the project while protecting resources. They are design, construction, and management features developed as part of the Process and incorporated by the appropriate CSP District staff into the description of the change-in-use proposal. If the impact would be significant and unavoidable despite the implementation of SPRs, PSRs, and mitigation measures, the project would not qualify for approval using the proposed Process, but rather would require its own independent CEQA compliance process. Therefore, an independent CEQA review and document would be undertaken by the District.</p> <p>The relationship of the change-in-use proposal evaluation and regulatory compliance is described on Draft Program EIR page 3-16. The Board’s permit authority is added to the list of potential compliance requirements. The following text addition has been made based on a comment made in Letter A1. The text of page 3-16 is hereby changed, as follows:</p> <p style="padding-left: 40px;">If a change-in-use proposal does not qualify for approval using the Process, it would require its own, independent CEQA document. This may occur because the proposal exceeds the limits of the project actions covered by the Process, as listed above in Section 3.5, Project Actions Covered By and Excluded from the Process. Also, a change-in-use proposal may result in an unavoidable, significant environmental impact or a potentially mitigable significant effect that required detailed investigation or mitigation planning to reduce the effect to a less-than-significant level. An otherwise qualifying change-in-use proposal that results in significant unavoidable effects or mitigable significant effects requiring detailed investigations or mitigation planning may begin its review using the Process, but will need to depart the Process on an “off ramp” to its independent CEQA document. In these cases, the information in the Program EIR may be cited or incorporated as evidence to support impact analysis or mitigation approaches in an independent CEQA document.</p> <p>Projects pursued through the Process would be subject to other applicable environmental laws and regulations. As CSP moves to comply with laws other than CEQA that require public notice on later activities, they may also reference this Program EIR, stating that the new action is within the scope of this Program EIR, and that it adequately describes the activity for CEQA purposes. Through the PEF process, CSP will ensure that any new actions</p> |

comply with the permit, consultation, and application requirements of agencies with jurisdiction. Depending on where the actions are planned to occur, these could include:

- ▲ Coastal Development Permit from the California Coastal Commission,
- ▲ Bay fill or shoreline band development permit from the Bay Conservation and Development Commission,
- ▲ Streambed Alteration Agreement from the Department of Fish and Game,
- ▲ Development permits from the Tahoe Regional Planning Agency,
- ▲ State and Federal Endangered Species Consultation,
- ▲ Section 404 permit from the U.S. Army Corps of Engineers,
- ▲ Permit for work involving levees within the jurisdiction of the Central Valley Flood Protection Board,
- ▲ Section 401 Water Quality Certification from the Regional Water Quality Control Board,
- ▲ National Pollutant Discharge Elimination System (NPDES) from the Regional Water Quality Control Board, and
- ▲ Cultural resource approval.

Any necessary permits or requirements of the Board would be identified through preparation of the CSP Project Evaluation Form (PEF) which reviews and assesses the potential resource impacts as a result of modifications and prepares appropriate CEQA documentation consistent with the Program EIR. Given the programmatic scope of the EIR for a statewide Process, discussion regarding the specific modifications needed for compliance with all potentially applicable environmental laws and regulations that may apply to a project cannot be covered under this Program EIR. Please also refer to Standard Project Requirements (SPRs) BIO-13 through BIO-28 which specifically highlights vegetation measures.

A1-2 Potential hydraulic impacts were assessed in Chapter 4.10, Hydrology, Water Quality, and Sedimentation, of the Draft Program EIR. As discussed in Impact 4.10-2 (see p. 4.10-30) of the Draft Program EIR, qualifying projects under the proposed Process and located within 100-year flood hazard areas would be designed to accommodate flood flows, consistent with SPR HYDRO-19, and construction design standards in the CSP BMP manuals and Trails Handbook. Implementation of design standards in the CSP Trail Handbook, would provide guidance and specifications to the appropriate location of any road/trail structures, so as not to interfere with flood flows or increase flood hazard. In addition, SPR HYDRO-27 would require safety plans and educational signage as part of the project design for hazard risk to trail users within flood prone areas. Other project-design related measures that address long-term prevention and/or reduction of channel and hydraulic impacts include SPR HYDRO-16 through HYDRO-28, GEO-11 through GEO-27, BIO-17, BIO-46, BIO-50 through BIO-51, and BIO-56 through BIO-58. All proposed SPRs are listed in Section 3.8.10 of the Draft Program EIR.

Although all project-level measures specific to levee improvement and maintenance are not feasible to address in the Program EIR analysis, any potential impacts not covered in the Program EIR would be addressed as PSRs or project-level CEQA review.

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| <b>Response<br/>A2</b> | <b>Sean Morgan, Director<br/>California State Clearinghouse and Planning Unit<br/>11/20/12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| A2-1                   | The commenter transmits a letter from the Central Valley Flood Protection Board (see Letter A1) submitted to the California State Clearinghouse and acknowledges that the Draft Program EIR has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the CEQA. This comment does not address the adequacy, accuracy, or completeness of the environmental document. No further response is required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>A3</b> | <b>Catherine Woody<br/>California State Water Resources Control Board<br/>11/30/12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| A3-1                   | The comment summarizes the proposed Process and does not address the adequacy, accuracy, or completeness of the environmental document. No further response is required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| A3-2                   | For impact analysis and measures related to State Water and Regional Water Board Jurisdiction, please refer to Section 4.4, Terrestrial Biological Resources (Impact 4.4-2), Section 4.5, Aquatic Biological Resources (Impact 4.5-1), and Section 4.10, Hydrology, Water Quality, and Sedimentation (Impact 4.10-1), of the Draft Program EIR. As described in Section 3.6, Project Requirements and Change-In-Use Evaluation Process, of the Draft Program EIR, compliance with Clean Water Act Section 401 requirements for qualifying projects would be ensured in the preparation of the Project Evaluation Form. If compliance cannot be assured or a project would result in significant and unavoidable impacts, it would not qualify for approval using the Process and an independent CEQA document would be required.                                                                                                                                                                                                                                                                                                                                                                               |
| A3-3                   | All change-in-use proposals are related to modifications of an existing road or trail and, inherently, the majority of change-in-use proposals are small scale, both in a geographic sense and in terms of environmental impact. Typical types of projects could include existing road and trail surface improvements, minor alignment changes, maintenance, and repair; changes in trail use type; and improvements to trails, points of access, and parking areas intended to either accommodate a new use or provide environmentally protective features. Therefore, significant watershed impacts would not be expected. Certain changes in use may include larger scale projects, such as trail decommissioning, road-to-trail conversions or trail re-routing, that would require more extensive ground disturbance and have the potential for greater impacts on watershed hydrology, water quality, and sedimentation. However, to qualify for approval using the proposed Process, significant water quality impacts must be avoided using SPRs or PSRs. Consequently, change-in-use proposals approved with the proposed Process would not result in significant water quality or watershed impacts. |
|                        | To clarify that watershed-scale effects would be minimized or eliminated in performing the proposed Process, a watershed-level , baseline pre-project hydrological conditions and aquatic resources is included in the Project Evaluation Form analysis, where needed. This baseline information would help assess potential water quality issues, sensitive aquatic resources, and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

existing conditions of the affected watershed(s) that would be considered in developing the potential change-in-use project. In addition, the evaluation of watershed conditions would provide insight as to whether there is a potential for significant direct, indirect, or cumulative effects from the implementation of a potential project and, if so, whether SPRs, BMPs and trail design guidelines would avoid potential impacts or additional mitigation measures are required to reduce or eliminate potential impacts.

The potential for the alteration of flow regimes or hydromodification would typically be reduced or eliminated by implementing SPRs including Project Design-Related Measures (HYDRO-16 through HYDRO-23, p.4.10-23:24); thereby reducing or eliminating potential upstream and downstream effects. The Project Design-Related Measures, as well as trail design specifications in the CSP Trails Handbook (1994), CSP BMP documents, and “low impact development” (LID) design techniques provide safeguards against the risk of potential flow diversion or obstruction of flow, as well as alterations of bottom contours or other changes to the hydrological regime. As stated, each project would be monitored for three years post-construction to make sure that no disruption of natural or pre-project flow regimes or drainage patterns has occurred.

The SPRs, as well as BMPs and trail design guidelines, are based on retaining natural or pre-project hydrologic conditions and therefore it is not anticipated that any significant design changes to flow volumes, channel location/size, or rate of discharge would be proposed. If a potential change-in-use project includes hydromodification that would significantly alter the baseline hydrologic regime in a manner that cannot be avoided by the SPRs, BMPs, and mitigation, the project would not qualify for approval under the proposed Process. If the District wished to pursue the project further, it would need an independent CEQA review and appropriate environmental document.

As part of the initial project evaluation process, CSP staff would identify other planned projects in the watershed(s) containing the proposed change-in-use proposal and consider cumulative effects. The proposed project would be evaluated as to whether it, in combination with other planned projects, would cause a considerable contribution to a significant, adverse cumulative effects on watershed hydrology and/or water quality.

Also as part of the initial project evaluation process, known sensitive ecological areas or degraded water bodies within the watershed(s) containing the proposed change-in-use project would be evaluated for potential impacts and reduced function. Projects that lie within watersheds containing sensitive aquatic resources would be evaluated to ensure that appropriate mitigations and BMPs are employed so that road and trail changes in use do not have significant adverse impacts on sensitive areas within the watershed.

Change-in-use projects would employ, where feasible and appropriate, “low impact development” (LID) design techniques that mimic natural or pre-project hydrologic conditions. Roads or trails modified under the Process would not result in the introduction of impervious surfaces. Road and Trail Change-In-Use project LID techniques may include various techniques to limit compacted and disturbed areas, reduce surface runoff and increase on-site infiltration, as well as trail reconstruction or decommissioning techniques that preserve natural geomorphic features and hydrologic function. Employing LID design techniques can result in the improvement of watershed hydrologic and ecologic function.

A3-4 The comment states that the project could contribute to the ongoing loss of aquatic and riparian habitat that provides habitat for special-status species, and the project could substantially reduce these habitats and restrict the movements of several species. The comment also recommends that the analysis consider the regional importance of movement corridors in and along water bodies, and potential effects of implementing the proposed process on the biological functions of these corridors.

CSP agrees that aquatic and riparian resources throughout California are very important biologically and require specific conservation and management consideration. The sensitivity and ecological importance of aquatic and riparian habitats in the context of habitat suitability for common and special-status species, connectivity and movement, and other ecological functions were priority issues and carefully considered in development of the proposed Process and in the Program EIR analysis. Approximately 25 SPRs intended specifically to protect aquatic and riparian resources were developed and incorporated into the proposed Process, including: SPR GEN-4, GEN-5, BIO-2, BIO-4, BIO-5, BIO-7, BIO-8, BIO-11, BIO-12, BIO-13, BIO-28, BIO-29, BIO-31, BIO-39, BIO-54, BIO-55, BIO-58, and BIO-59 (see Section 4.5, Aquatic Biological Resources, Pages 4.5-17—20 for applicable SPRs). Also, as specified on Page 4.5-17, the CEQA significance criteria that apply to this issue were whether the project would: 1) have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS; 2) have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFG or USFWS; 3) have a substantial adverse effect on federally-protected wetlands, as defined by Section 404 of the CWA, through direct removal, filling, hydrological interruption, or other means; and 4) interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Potential effects related to these issues and significance criteria are addressed in Section 4.5 (Aquatic Biological Resources), Impact 4.5-1 (Construction-Related Disturbance or Loss of Common and Sensitive Aquatic Habitats) and Impact 4.5-2 (Construction or Other Project-Related Disturbance or Impacts to Special-Status Aquatic Species and Habitats); and Section 4.4 (Terrestrial Biological Resources), Impact 4.4-2 (Construction-Related Disturbance or Loss of Sensitive Habitats [Jurisdictional Wetlands, Riparian Habitat, and Other Special-Status Natural Communities] and Impact 4.4-4 (Short-Term, Construction-Related Disturbance or Loss of Special-Status Wildlife Species and Habitats, and Wildlife Movement Corridors).

As described in the Program EIR, because implementation of change-in-use projects would be limited mostly to existing disturbed road and trail prisms and adjacent areas, which currently experience noise and other disturbances associated with motorized and non-motorized use and maintenance, project areas are not expected to function as significant movement corridors for common or sensitive wildlife species; and potential impacts to suitable habitat and movement requirements for most wildlife species would be very infrequent and are not expected. Conversion of trails for use by bicycles or other uses are not expected to create permanent barriers to the movement of resident or migrating wildlife that could utilize native habitats along trails. The types of change-in-use projects that qualify under the proposed Process are not expected to create new movement barriers, bifurcate any important habitat areas, or prevent wildlife from continuing to access or travel between habitat areas in the vicinity. Additionally, most of the long-term effects of implementing projects that qualify under the proposed Process

on aquatic biological resources are expected to be beneficial or neutral, because (1) any change in use must be developed and implemented with the objective of natural and cultural resource protection, (2) the specific purpose of many change-in-use proposals would be to correct existing conditions that contribute to resource degradation, (3) most actions and ground disturbances would occur within existing disturbed areas, and (4) SPRs to protect biological resources during construction and over the long-term are incorporated into the Process.

During preparation of the PEF, the District reviewing the proposal would confirm that all potential significant biological impacts would be avoided or maintained at a less-than-significant level by the SPRs, PSRs, or project-specific mitigation measures. If a biological impact of a change-in-use proposal would be significant and unavoidable, the project would not qualify for approval using the Process, but rather would require its own independent CEQA compliance process. Therefore, an independent CEQA review and document would be undertaken by the District.

A3-5 The potential effects to wetlands, waters of the state, and other sensitive aquatic habitats that are of concern to the commenter are discussed in detail in Section 4.4 of the Program EIR. These resources would be addressed in the proposed Process to ensure that qualifying change-in-use proposals do not result in significant biological impacts. Several SPRs address sensitive wetland and other aquatic resources, including: SPR GEO-8, GEO-18, BIO-4, BIO-9, BIO-10, BIO-11, BIO-12, and BIO-39 through BIO-62 (please see Section 3.8.1, General Standard Project Requirements, of the Draft Program EIR for the full description of each SPR).

During preparation of the PEF, the District reviewing the proposal would confirm that all potential significant wetland and aquatic resource impacts would be avoided or maintained at a less-than-significant level by the SPRs, mitigation measures contained in the Program EIR (i.e., Mitigation Measures 4.4-2 and 4.5-1), PSRs, or project-specific mitigation measures. If a wetland or aquatic resource impact of a change-in-use proposal would be significant and unavoidable, the project would not qualify for approval using the Process, but rather would require its own independent CEQA compliance process. Therefore, an independent CEQA review and document would be undertaken by the District.

A3-6 As stated above in Response to Comment A3-3, watershed-level information would be included as part of the pre-project hydrological conditions and aquatic resources analysis in the project evaluation process. This preliminary watershed-level information would help determine potential water quality and hydrologic issues in the affected watershed(s) to determine whether the change-in-use proposal would have significant direct, indirect, or cumulative effects on the watershed. For example, sensitive aquatic resources (e.g., special-status species, sensitive wetland habitats, etc.) would first be identified in the watershed. Next, the project would be evaluated with respect to its potential for impacting those resources through direct, indirect or cumulative upstream and downstream effects on hydrology, water quality, and sedimentation. Many of the site-specific impacts addressed in the hydrology, water quality, and sedimentation significance criteria listed in Section 4.10.3 of the Draft Program EIR would be evaluated during the initial project evaluation process, and thereby would assist in determining the potential cumulative effects from the proposed project on the watershed-scale.

The proposed Process utilizes SPRs, specific CSP BMPs and trail design guidelines, and LID design techniques that are aimed at maintaining water quality and restoring or retaining natural geomorphic and hydrologic conditions. Because of this, most change-in-use projects are

expected to not result in significant direct, indirect, or cumulative impacts to waters of the state at the watershed scale.

Pollutants generated during construction activities would be controlled through the implementation of SPRs, including the Storm Water Pollution Prevention Plan (HYDRO-1, p. 4.10-21), Basin Plan Requirement Measures (HYDRO-2, p. 4.10-22), and Construction-Related Measures (HYDRO-3 through HYDRO-15, p.4.10-22:23). Utilizing these measures would reduce or eliminate the impacts to upstream and downstream watershed resources during construction, thereby retaining watershed health.

Post-construction water quality, hydrology, sedimentation, and other conditions related to the changes-in-use proposal would be monitored by CSP staff for a period of five years following project implementation as part of the Adaptive Use Management (AUM) process. If the completed project exhibits “erosion and sedimentation at significant levels, disrupted hydraulic flow patterns, or degraded water quality” or if the project exhibits significant adverse hydrologic impacts from the implementation of a change-in-use proposal, then CSP staff must develop a remediation plan to resolve the impacts (refer to Section 4.10.5, p. 4.10-24, Environmental Impacts and Mitigation, of the Draft Program EIR). Controlling the on-site generation of pollutants, and eliminating off-site transport, would reduce or eliminate adverse effects on watershed.

As stated above, change-in-use projects are generally of small geographic scale and low impact; they are specifically designed so as to largely correct any pre-project hydrologic issues and retain natural or pre-project hydrologic conditions, including both retention times and runoff volumes. SPRs (HYDRO-16 through HYDRO-24, p. 4.10-23:24), CSP BMPs and trail design guidelines, and LID design techniques provide procedures that would facilitate maintenance of natural flow patterns, and therefore, reduce or eliminate the likelihood of the reduction in aquatic function. By retaining natural or pre-project conditions through the employment of SPRs, CSP BMPs and trail design guidelines, there is expected to be little or no disruption in aquatic function at the site-level and no disruption at the watershed-scale for most change-in-use projects. Site disruptions on larger projects (e.g., road decommissioning or road-to-trail conversions) would be consistent with the scale of the disturbance and whose duration would be dependent on the natural recovery of the site following the application of design treatments, SPRs and BMPs. In any case, only change-in-use proposals for which SPRs, PSR, BMPs, trail design guidelines, and/or project-specific mitigation measures would maintain hydrologic and water quality impacts at a less-than-significant level would qualify for approval under the proposed Process.

**Response  
A4**

**Annesley Ignatius, Deputy Director – Land Development & Construction  
County of San Bernadino Department of Public Works  
12/3/12**

A4-1

Commenters appreciation for the opportunity to comment on the Program EIR is noted. No further comment is provided.

| Response<br>A5 | Elish Ryan, Park Planner<br>County of Santa Clara, Parks and Recreation Department<br>12/4/12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A5-1           | The commenters evaluation of the proposed Process and objectives for compatibility with the policies and guidelines of the Santa Clara County General Plan and Trails Master Plan are noted. This comment does not address the adequacy, accuracy, or completeness of the environmental document. No further response is required.                                                                                                                                                                                                                                                                                                                                                                                                         |
| A5-2           | The commenters conclusion that the proposed Process is not in conflict with County of Santa Clara policies or ordinances is noted. This comment does not address the adequacy, accuracy, or completeness of the environmental document. No further response is required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| A5-3           | The commenters conclusion that the CSP Trails Policy and proposed Process are compatible with the Santa Clara County Trails Master Plan's <i>Use and Management Guideline M-1.2, Trails and Trail Uses</i> , is noted. This comment does not address the adequacy, accuracy, or completeness of the environmental document. No further response is required.                                                                                                                                                                                                                                                                                                                                                                               |
| A5-4           | All change-in-use project proposals are currently evaluated on a case-by-case basis, which would continue with implementation of the proposed Process. As discussed in Chapter 3, Project Description, of the Draft Program EIR, the Program EIR may be used to simplify future environmental documents for change-in-use proposals that are not entirely within the scope of the Program EIR. This could include focusing subsequent EIRs or mitigated negative declarations (MNDs) on any new significant effects that were not covered in the Program EIR. If a change-in-use proposal does not qualify for approval using the Process, it would require its own, independent CEQA review and document.                                 |
| Response<br>A6 | David Szymanski, Superintendent<br>National Park Service, Santa Monica Mountains National Recreation Area<br>12/4/12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| A6-1           | The commenter's interest in evaluating the application of similar processes or procedures in the anticipated Trails Management Plan and EIR/EIR for the Santa Monica Mountains National Recreation Area is noted. CSP would be happy to work with NPS, as needed, to ensure consistent and complimentary trail management practices in areas within the Santa Monica Mountains National Recreation Area that may transect CSP land. The commenter's opinion that the proposed evaluation process is comprehensive, SPRs are practical and applicable, and the PSRs and AUM program provide flexibility to address site and project-specific conditions is noted for consideration during the review of the merits of the proposed Process. |
| A6-2           | The commenter's support of the nighttime lighting evaluation and suggestion to track changes in frequency or the illuminative power of lighting through the AUM program and include a statement of the value of night sky under the SPR for aesthetic and views is noted. As discussed in Impact 4.2-3 of the Draft Program EIR, no new permanent lighting sources would be added to CSP units as a result of implementing the proposed Process. Roads and trails in CSP units are                                                                                                                                                                                                                                                         |

generally closed from sunset to sunrise, so nighttime use would continue to be limited to overnight visitors (e.g., campers). None of the trail user types typically generate large quantities of light or glare (i.e., limited to headlamps, bike lanterns, or hand-held flashlights), and light and glare levels would be expected to remain substantially the same as existing conditions. Therefore, impacts associated with light and glare would be less than significant.

A6-3

The Draft Program EIR discusses the potential for dust generation during construction in Impact 4.3-5. Changes in trail use may result in alterations to trail use character and surface alterations that could also lead to the potential for windblown dust from user activities. CSP does not anticipate that operational fugitive dust emissions would be substantial, would contribute to violations of ambient air quality standards, or cause a nuisance, because the proposed Process involves only modifications to existing trails and the overall level of trail use is not expected to be substantially different from existing conditions. In addition, please refer to SPRs for trail construction and stabilization to prevent erosion and windblown dust in Sections 4.7, "Geology, Soils, and Minerals" and 4.10, "Hydrology, Water Quality, and Sedimentation" of the Draft Program EIR. Pages 4.7-24 -25, 4.10-22 through 24, and pages 4.10-27 and -28 of the Draft Program EIR summarize SPRs and site-specific BMPs that include measures to control speeds of trail users, stabilize soils, minimize erosion, and restrict trail use when conditions are adverse. These types of measures would minimize the potential for increases in operational fugitive dust emissions compared to existing conditions.

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## O: ORGANIZATIONS

| Response<br>01 | Kevin Dalfonzo, ACSD President<br>Allied Climbers of San Diego<br>12/4/12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| O1-1           | The commenters concern that the Process would result in restricted public access or limits to public use of CSP land is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| O1-2           | <p>The closure, decommissioning, and restoration of an existing trail would be a part of a change-in-use proposal, if it was necessary to protect sensitive resources or resolve an environmentally degraded condition. CSP would consider the adequacy of public access in review a proposal for a trail closure. As described in Section 4.14, Recreation, of the Draft Program EIR (p. 4.14-3), CSP's Departmental Operation Manual (DOM) includes the following policy related to closure of recreational roads or trails.</p> <p style="text-align: center;"><b>0317.1.1 Visitor Recreational Uses Policy</b></p> <p>It is the policy of CSP that careful analysis of long-term impacts to natural processes and resources will be carried out when planning recreational uses, including interim public use, for State Parks, State Reserves, State Natural Preserves and State Wildernesses. Districts should complete long-term planning for removal or relocation of impacting visitor uses within prime resource areas. District Superintendent closures, permanent or temporary, should be considered in areas where restoration is needed for significant natural resource values that have been degraded by recreational use. Long-term monitoring of the natural resource health will be selectively applied to assess recreational impact on key indicators of parkland health.</p> <p>Any change in use must be consistent with existing CSP mandate to protect natural and cultural resources consistent with its mission and along with the objectives of providing recreation opportunities for California residents, visitors, and user groups. Responsible resource conservation decisions lead to successful environmental stewardship while at the same time providing enjoyment for current and future generations. Through well-designed, constructed, managed, and maintained roads and trails, optimal public access is achieved in concert with resource conservation. CSP has developed a coordinated set of planning guides to manage State Park trails to meet the recreational, educational, and interpretation needs of the diverse trail users that, through a public planning process, results in the development of trails within CSP units that are consistent with unit classification, general plan directives, cultural and natural resource protection, public safety, trail access, user compatibility, and other legal mandates.</p> |
| O1-3           | Including decommissioning of roads and trails in the list of candidate actions for a change-in-use proposal is consistent with CSP's mission and policies, which involves both provision of recreation opportunities and stewardship of natural and cultural resources. As discussed in Section 3.3.2 of the Draft Program EIR, one of the goals of the California Recreational Trails Plan most relevant to the proposed Process is to "provide the maximum opportunities for the public use of trails by encouraging the appropriate expansion of multi-use trails" (CSP 2002a; 25). The                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

proposed Process would essentially implement some of the action guidelines for this goal, including establishment of “a public process, coupled with scientific data and documentation, for determining use groups appropriate for trails within State Parks” (CSP 2002a; 25). Along with the objectives of providing recreation opportunities for California, any change in use must also be consistent with existing CSP mandate to protect natural and cultural resources. Another objective of the proposed Process is to ensure that all of its decisions are made in an open and transparent process.

Using the proposed Process for road or trail decommissioning would help evaluate them in a systematic and consistent manner in park units statewide. The decommissioning of roads or trails already occurs within CSP units where appropriate to protect sensitive resources or resolve an environmentally degraded condition. The proposed Process would not change this management strategy or increase its application; it is simply another project review approach available to Districts.

In some cases, a temporary closure may also occur where construction related to a change-in-use project could interfere with trail use. SPR GEN-8 would require CSP to post information signs near project areas with restricted access or closures lasting longer than 3 months. The signs would include explanation for and description of the project with anticipated completion date.

- O1-4 As described in Impact 4.14-1 (p. 4.14-5) of the Draft Program EIR, a routine part of the existing change-in-use procedure for proposed elimination of a recreational use from a road or trail is for CSP to consult with agencies that manage other nearby trails to confirm that adequate capacity for displaced users is available in the region. Similarly, this procedure would apply to any temporary or permanent road or trail closures proposed for evaluation under the Process. Displaced use may relocate to other CSP trails or other CSP park units that accommodate that use. It is also possible that the use may be displaced to trails managed by other land management agencies including local or regional parks, private recreation sites, or Federal lands such as those managed by the U.S. Forest Service, Bureau of Land Management, or the National Park Service. By considering the available capacity of trail facilities in the region, CSP would account for the trail opportunities for displaced users in its decision to close and decommission a road or trail, so the availability of other trails would be considered and the potential for an indirect, adverse effect on other trail facilities from displaced users would be less than significant.
- O1-5 Rock climbing in appropriate resource areas is a type of passive recreational activity that occurs within certain state park units. As stated on p. 3-10 of the Draft Program EIR, “The Process provides an objective and systematic approach for making decisions regarding the addition or removal of non-motorized uses of a State Park System road or trail. These uses may include: pedestrian, equestrian, mountain bike, or other non-motorized road and trail uses not currently recognized.” Although rock climbing is not specifically referenced in the document, the use of a road or trail to provide access to a rock climbing area would fall within the ‘other non-motorized uses’ frequently referred to throughout the document. Effects on other recreational opportunities, including rock climbing, would be considered in the review of change-in-use proposals, if the affected road or trail provides the only access available to the recreational resource.
- O1-6 The proposed Process is designed to provide public input or notice at multiple points during the review of change-in-use proposals. As part of the completion of the Road and Trail Use Change

Survey, the District and proposal evaluation team would gather input from local user groups, as shown in the middle row of actions on the flow chart. Public notice of a proposed change to a trail would also occur during the CEQA Compliance stage (preparation of an NOD or MND) of the Process (refer to the middle left bubble of flowchart in Exhibit 3-2, p. 3-12 of the Draft Program EIR). Further, when SPR GEN-9 (AUM) is implemented as part of a project, the Adaptive Management Report (AMR) would be available for public review at the CSP District Headquarters (refer to page 3-14 and 3-15 of the Draft Program EIR for a description of AMRs).

- O1-7 Impacts to recreation were addressed in Section 4.14, Recreation, of the Draft Program EIR. Impacts associated with implementation of the proposed Process were evaluated by describing existing CSP recreation facilities and assessing the potential for the addition or removal of user types under the proposed Process that could result in an increase in use and substantial physical deteriorate an existing recreational facility. The analysis also determines whether implementation of the proposed Process may involve the need to expand or construct new recreation facilities (in addition to those evaluated under the proposed Process) that could result in adverse physical effects on the environment. The SPRs do not include a category of provisions specifically related to recreation use management, because the purpose of the SPRs is to address protection of resources and prevention of significant environmental effects.
- O1-8 The comment refers to the discussion about the biological environmental effects of road or trail decommissioning (Section 4.4, Terrestrial Biological Resources), so statements about the effect of road or trail closure and decommissioning would not be required at this location in the Program EIR. As noted in Response O1-4, CSP would consider the effects of a road or trail closure on other trail facilities in the vicinity of the proposed action.
- O1-9 Under CEQA and in the Program EIR, the issue of whether project implementation would significantly affect a species is not limited to only take of a species listed under the federal Endangered Species Act (ESA) or California Endangered Species Act (CESA), or species protected under the BGEPA. The analysis must consider whether a project would have a substantial adverse effect on a special-status species, which includes several species not listed under the ESA or CESA, or protected under the BGEPA. (Species that meet the definition of “special-status species” in the Program EIR are listed on Pages 4.4-5 and 4.4-6.) While “take” as defined in the California Endangered Species Act and federal Endangered Species Act would be considered a significant effect, the EIR must analyze whether any “substantial” effect on a special-status species could occur. Disturbances as a result of recreation activities could be substantial if they result in injury, mortality, permanent displacement, or substantial habitat degradation or loss of a special-status species. As specified on Page 4.4-22 of the Program EIR, the CEQA significance criterion that applies to this issue is whether the project would “have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS.” In general, while CSP may not be required to manage specifically for a particular special-status species, CEQA requires that actions that could significantly adversely affect a special-status species be considered and, if necessary, mitigated to a less-than-significant level.

Outside of the CEQA requirements for evaluation of potential impacts to wildlife, part of the mission of CSP is to preserve the State’s unique biological diversity. To that end, Section 0311.5.1.1 of the CSP Departmental Operations Manual states that a policy of CSP is that no

person shall harm wildlife. Therefore, while not protected by the take prohibitions of CESA or ESA, all wildlife species are afforded protection as a matter of CSP policy.

- O1-10 The mission of the CSP is to provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation. It is a balancing act that requires CSP to resolve conflicts between these sometimes competing goals. Nevertheless, the policy direction is based on the premise that natural resources management is the primary goal with providing for visitor use that is compatible with a park unit's natural resources. Please refer to responses to comments O1-2, O1-3, O1-7, and O1-8. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.
- O1-11 Please refer to response to comment O1-6 for a description of public input opportunities and public notice within the proposed Process. SPR GEN-8 would require CSP to post information signs near project areas with restricted access or closures lasting longer than 3 months. The signs would include explanation for and description of the project with anticipated completion date.
- O1-12 No trail closures or trail decommissioning would be implemented as a result of CSP approval of the proposed Process. This document assesses the proposed Process for CSP change-in-use requests; no specific projects have been identified or conceptualized as a part of this CEQA review. Therefore, the location, number and character of specific change-in-use proposals cannot be known at this time, because they would depend on future actions of the individual Districts. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. The comment provides no specific evidence that the analysis presented in the EIR is inadequate, inaccurate, or inappropriate. No further response is necessary.
- O1-13 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. The comment provides no specific evidence that the analysis presented in the EIR is inadequate, inaccurate, or inappropriate. No further response is necessary.

**Response  
02**

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**William O. Davis, Attorney at Law  
California Equestrian Trails & Lands Coalition  
10/2012**

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- O2-1 The commenters prefatory remarks and summary of project scope does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.
- O2-2 The commenters concern regarding potential environmental effects of trail use is noted. For analysis of potential environmental impacts associated with change-in-use under the proposed Process, please refer to Chapter 4, Environmental Setting, Environmental Impacts, and Mitigation Measures, of the Draft Program EIR. Specifically, issues related to use-appropriate design of trails, trail safety, and risks of accidents are evaluated in Section 4.9, Hazards and

- Hazardous Materials, of the Draft Program EIR. Please also refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.
- O2-3 This comment and attached newspaper article are noted for consideration during project review. Because this comment does not raise environmental issues directed specifically to the proposed Process or concerns regarding the adequacy, accuracy, or completeness of the environmental document, no further response is required.
- O2-4 Commenters encouragement to develop enforcement programs is noted. Issues related to use-appropriate design of trails, trail safety, and risks of accidents are evaluated in Section 4.9, Hazards and Hazardous Materials, of the Draft Program EIR. Impact 4.9-4 (p.4.9-12 of the Draft Program EIR) explains that any qualifying change-in-use project would require use-appropriate trail design that is consistent with CSP standards and BMPs. The Project Evaluation Form (provided in Appendix E of the Draft Program EIR) includes specific use-appropriate design criteria for bicycle and equestrian uses. Design features may include tread width, passing space dimensions, sight distance, speed control, turning radius, surface texture, signage, and enforcement. Please also refer to Master Response 2, Comments Related to Safety on Multi-Use Trails. This comment does not raise environmental issues directed specifically to the proposed Process or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.
- O2-5 The commenters reference to replacing the word “could” with “shall” does not cite a specific passage, but appears to be related to text quoted from page 8-4 of the Draft Program EIR in the previous paragraph of the comment letter (i.e. “Other management actions could also be considered....includ[ing] adopting and posting rules and regulations). Management actions refer to a variety of tools that may be used for a project. The word “could” is used because what may be appropriate for one particular road or trail may not necessarily be appropriate for another. Regarding enforcement of trail regulations, please refer to response to Master Response 2, Comments Related to Safety on Multi-Use Trails. As discussed in Chapter 8 of the Draft Program EIR, the provisions of the CEQA regard human conflict on recreational roads and trails as a social issue that does not qualify, by itself, as an environmental impact. Please also refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.
- O2-6 This comment and the attachment referenced, does not raise environmental issues directed specifically to the proposed Process or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.
- O2-7 Section 4.2, Aesthetics and Views, of the Draft Program EIR evaluates the potential for projects that qualify for approval under the proposed Process to adversely affect existing scenic resources and views, as well as potential to degrade the existing visual character of the landscape surrounding change-in-use projects. Because CEQA review is required to address changes to the physical environment, the analysis of aesthetic impact appropriately focuses on potential changes to the scenic resources in the landscape. The evaluation concludes that projects qualifying for approval under the proposed Process would, at most, include minor physical alterations to existing CSP roads and trails and that the addition or removal of a user type from an existing road or trail would not substantially change visual character or substantially alter scenic views of the trail as viewed from the trail.

The comment appears to request expansion of the Program EIR analysis to the potential adverse effects on the “aesthetic experience associated with riding a horse or walking” resulting from the added presence of mountain bicycle users. This issue would relate to the quality of the recreational experience of trail users, rather than changes to physical environmental resources. The recreational experience of users is an important concern of CSP; however, it is a social issue that is not within the purview of CEQA review. The comment is noted for consideration during project review.

- O2-8 Safety is a CEQA issue and it was addressed in Section 4.9, Hazards and Hazardous Materials, Impact 4.9-4: Changes in Trail Safety, of the Draft Program EIR. Erosion and loss of topsoil under the proposed Process is evaluated in Section 4.7, Geology, Soils, and Mineral Resources, of the Draft Program EIR. Impact 4.7-2 (page 4.7-28) identifies erosion impacts specific to certain user groups and concludes substantial erosion impacts would be avoided through implementation of the SPRs GEO-1 through GEO-27 and GEO-29.

Although not a CEQA-issue, trail use conflict is an important topic that is discussed in Chapter 8 and Appendix C of the Draft Program EIR. The issue of human conflict and emotions on recreational roads and trails is a social topic that does not qualify, by itself, as an environmental impact under the purview of CEQA. Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.

- O2-9 This comment provides information about purported trail incidents to support an expressed argument that injuries have been incurred by equestrians, because of excessive speed or other inappropriate trail use by cyclists. It is not feasible to confirm or refute the described incidents based on the information provided. Regardless, the Program EIR includes an extensive study of trail use conflicts, survey of trail managers regarding known incidents and accidents, and summaries of user complaints. The report is provided in Appendix C of the Program EIR, Trail Use Conflict Study. This study provides substantial evidence upon which conclusions regarding trail use conflict in the EIR are based.

The Trail Use Conflict Study reports on the results of considerable research and consultation to provide an objective and comprehensive evaluation of road and trail incidents and resulting consequences. It identifies Management Strategies to include enforceable rules, monitoring and enforcement and data tracking. Each District maintains a log of injuries, enforcement-related calls, and other law enforcement actions. To help CSP track such incidents, they need to be reported to State Park personnel in a timely manner.

This is a comment on a specific feature of the trail use process and not the adequacy of the CEQA document. The comment is noted for consideration during review of the proposed Process for potential approval. Please also refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses, and Master Response 2, Comments Related to Safety on Multi-Use Trails.

- O2-10 The request for an enforcement program to prevent high speed bikers and enforce trail rules is noted. Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails. Enforcement of trail rules is not a topic relevant to the proposed Change-In-Use Evaluation Process.

- O2-11 Section 1.2, Use of a Program Environmental Impact Report, of the Draft Program EIR provides a description of different ways the document can be used pursuant to the State CEQA Guidelines.

The Program EIR is programmatic in nature and does not specifically analyze individual projects. If CSP finds a project to be entirely within the scope of the Program EIR, CSP must incorporate all SPRs that are relevant to and appropriate for the proposed change in use, and all feasible mitigation measures, as needed, to address significant or potentially significant effects on the environment. Some SPRs may not be relevant to a project. For example, SPR GEO-12 (p. 3-33 of the Draft Program EIR) would not be relevant to a project with no stream crossings. Similarly, mitigation measures would be used 'as needed' because not all mitigation measures in the Program EIR would apply to all projects. For example, a measure that requires mitigation for construction impacts to aquatic habitat (i.e. Mitigation Measure 4.5-1) would not be applicable to a project that has no aquatic habitat located within it.

As described in Section 3.6.3 (p. 3-13) and illustrated in Exhibit 3-2 of the Draft Program EIR, a Project Evaluation Form (PEF) is prepared by CSP staff to review and assess the potential resource impacts as a result of change-in-use modifications and prepare appropriate CEQA documentation consistent with the Program EIR. The CSP Project Evaluation Team would include representatives from Visitor Services, Technical Services, Natural and Cultural Services, and Defensive Planning and Park Management. The PEF is then circulated to qualified staff for CEQA and PRC Section 5024 (cultural resources) review. CSP staff would review the PEF to determine which SPRs and mitigation measure are applicable to a specific project.

O2-12

The commenter raises a concern about deferred mitigation measures, but does not provide any specific examples from the Draft Program EIR or explain the relationship between mitigation measures and allowing the concerns of equestrians to be addressed. The proposed Process is designed to provide public input and/or notice at multiple points during the review of change-in-use proposals. As part of the completion of the Road and Trail Use Change Survey, the District and proposal evaluation team would gather input from local user groups, as shown in the middle row of actions on the flowchart (see Exhibit 3-2, p. 3-12, of the Draft Program EIR). Public notice of a proposed change to a CSP road or trail would also occur during the CEQA compliance stage (preparation of an NOD or MND) of the Process (refer to the middle left bubble of flowchart in Exhibit 3-2, p. 3-12, of the Draft Program EIR). Further, when SPR GEN-9 (AUM) is implemented as part of a project, the Adaptive Management Report (AMR) would be available for public review at the appropriate CSP District Headquarters (refer to page 3-14 and 3-15 of the Draft Program EIR for a description of AMRs).

With respect to mitigation measures: the majority of environmental protection features in the proposed Process are required as SPRs, which helps ensure that they are incorporated into the design of change-in-use proposals, as applicable to the environmental setting of each project. Two mitigation measures are also included in the Program EIR, both related to wetlands and/or aquatic resource effects (Impacts 4.4-2 and 4.5-1). These measures include compliance with enforceable regulatory requirements that include performance standards for the protection of the natural processes and qualities of the affected wetland resources. When compliance with regulatory processes would be reasonably expected to result in less than significant effects, including this compliance is an appropriate mitigation approach under CEQA. Please refer to response to comment O1-6 for description of opportunities for public review of change-in-use projects. Regarding commenters concern over high-speed trail users, please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

- O2-13 This comment regarding CSP’s approach for decision-making under the proposed Process does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document.
- CSP policies do not give preference to user type over another. The commenter provides no evidence that CSP is more responsive to one user group over another or that CSP does not address incident reports. This comment provides no evidence that the analysis presented in the Draft Program EIR is inadequate, inaccurate, or inappropriate is given. No further response is necessary.
- The potential for trail use conflict is an important CSP management concern. A Trail Use Conflict Study (Study) is included in Appendix C of the Draft Program EIR. The literature review and agency survey results found that accidents are rare compared to the number of incidents, and actual incidents tend to be rare in relation to extent of comments and complaints about conflict between trail user types. Study findings indicate that complaints and controversy about other trail users are common and that mountain bikers’ speeds are the primary reported cause for multi-use trail conflicts. Please also refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.
- The Trail Use Conflict Study identifies Management Strategies to include enforceable rules, monitoring and enforcement and data tracking. However, CSP’s response procedure for accident and incident reports is not a CEQA issue or relevant to this environmental analysis of the proposed Process.
- O2-14 Please refer to response to comment O1-6 and O2-12.
- O2-15 The comment misinterprets how Adaptive Use Management (AUM) would be implemented and misunderstands how it would strengthen environmental protections. AUM is an SPR, so it is a mandatory feature of the proposed Process. Employing AUM would provide a supplemental “safety net” for environmental resource protection and management, rather than replace required environmental protection features in other SPRs. All of the other applicable SPRs would be implemented to avoid significant environmental effects or maintain them at less-than-significant levels. In this way, the AUM process is a valuable tool to help Districts strengthen management and protection of environmental conditions through monitoring after implementation of a change-in-use project and, if needed, management responses to environmental degradation, including unanticipated conditions. The full array of SPRs would be effective in addressing known, potential environmental effects; however, it is not possible to envision all the potential environmental conditions that may occur in the future, because the current proposed action is to approve an evaluation process, and review and approval of specific roads and trail change-in-use projects would be later activities, proposed in the future by the Districts. AUM enables District managers to be responsive to unexpected environmental circumstances, which creates the “safety-net” quality of the AUM component of the proposed Process.
- The Program EIR provides a comprehensive description of the AUM process. Please refer to SPR GEN-9 (p. 3-17) in the Draft Program EIR. As explained in Section 3.6.3, Adaptive Use Management Strategy, of the Draft Program EIR, roads and trails qualifying for a change in use through the proposed Process would be required to implement SPRs, including AUM (SPR GEN-9). AUM procedures involve establishing baseline use conditions for the change-in-use proposal;

implementing monitoring and management responses to ensure that unanticipated environmental consequences would not cause significant impacts; and to correct, if necessary, user-created road or trail issues (see page 2-2 of the Draft Program EIR). The proposed Process includes AUM as an SPR designed to monitor and correct, if necessary, user-created trail issues. Adaptive management is a well-established concept used in natural resources management. Adaptive strategies are commonly included in projects affecting natural resources and natural systems, where conditions and effects can change over time, such as ecosystem restoration projects, water resources projects, or, in this case, projects involving on-going recreation use in natural settings.

CEQA requires that significant or potentially significant environmental impacts be identified prior to CSP taking an action, like approval of the proposed Process. Also, to the extent feasible, mitigation measures must be defined and adopted prior to the action. It is not sufficient to simply call for a future study to determine later what appropriate mitigation is. The Program EIR provides a comprehensive evaluation of potential environmental effects, recognizing the influences of the SPRs and identifies mitigation measures, where needed to address significant impacts that could not be avoided by implementing the SPRs.

The AUM program is not a mitigation measure, however. It is a mandatory standard requirement. As discussed in the Draft Program EIR (see page 3-14 of the Draft Program EIR), AUM under the proposed Process would involve a standard procedure of describing (1) existing use and resource conditions as a baseline during the preparation of the change-in-use survey at the start of the Process and (2) performance standards for maintaining use at levels that do not result in significant effects on the environment. The performance standards would be tailored to each change-in-use proposal and its park unit. They would describe desired use and resource conditions necessary to maintain impacts at less-than-significant levels. All performance standards would relate to use conditions or resources that are observable in the field by CSP staff. As outlined on p. 3-14 of the Draft Program EIR, recommended performance standards to avoid long-term significant impacts to biological resources include:

- ▲ No unplanned user-created trails originating from a change-in-use action (e.g., trail reroute),
- ▲ Maintenance of vegetation conditions without substantial trampling or other degradation from trail and related recreation use,
- ▲ No substantial increase in user-created disturbance to sensitive habitats (e.g., wetlands) adjacent to trails and roads treated by change-in-use actions,
- ▲ No increased use of areas occupied by special-status plant or wildlife species,
- ▲ No evidence of increased, direct wildlife mortality associated with change-in-use actions, and
- ▲ No new populations of invasive plants associated with change-in-use actions.

Qualified CSP staff would inspect the route and associated use areas that are affected by a change-in-use proposal at least semi-annually during the first three years following implementation of the change in use and would prepare an Adaptive Management Report (AMR) at the end of each year regarding achievement of the performance standards established for the project, consistent with CSP DOM 0313.1.1.5. The AMR would be available for public review at the District Headquarters. The report would include the results of observations of use and resource conditions noted for the performance standards, any degradation that exceeds the performance standard and response or remedial actions recommended to resolve the issue. A

follow-up inspection would occur within three months following implementation of the remedial action to assess the effectiveness of any required remedies. If after re-inspection, park staff determine the remedy to be effective, no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent's Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result of the AUM process, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded during the three years following implementation. Between three and five years after implementation of a change-in-use proposal, qualified CSP staff would inspect the route and associated use areas that are affected by the proposal at least annually and would prepare an AMR at the end of each year regarding achievement of the performance standards established for the project. The follow-up inspection would occur within six months to assess the effectiveness of any required remedies. If after re-inspection, park staff determines the remedy to be effective, no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent's Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded for a sufficient time to allow incorporation of the road or trail with its changed use into the routine, long-term resources management activities of the park (see pages 3-14, 3-15 of the Draft Program EIR).

In summary, AUM functions similarly to the CEQA-required (Guidelines Section 15097) Mitigation Monitoring and Reporting requirement, which helps to ensure that mitigation measures are implemented after project approval. It is generally an ongoing or periodic process of project oversight and ensures that project compliance is assessed on a regular basis after project implementation.

O2-16 Please refer to response to comment O2-15 regarding AUM and Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. The commenter expresses an opinion about the implementation of the Process. No further response can be provided.

O2-17 Please refer to response to comment O2-15 regarding AUM. It is important to emphasize that AUM would be a monitoring/response approach to managing the park's environmental conditions, not a future study to determine mitigation measures. The use of SPRs to incorporate environmental protection features would be mandatory, prior to implementation, and would not be replaced by AUM.

Implementation of the SPR, GEN-9 (AUM), would require qualified CSP staff to inspect the route and associated use areas that are affected by a change-in-use proposal at least semi-annually during a period of up to five years following implementation of the change in use. Because carrying out AUM would be integrated into the District personnel's routine resources management duties, the potential cost and staffing that may be needed to implement the Process objectives for future qualifying projects is feasible. In addition, this Program EIR may be used to simplify future environmental documents for change-in-use proposals. This could help reduce the time and expense associated with environmental review for qualifying change-in-use projects and reinforces the feasibility of carrying out the proposed Process.

- O2-18            Regarding unauthorized trails (volunteer trails), please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. All public input received regarding potential environmental effects have been considered in the development of SPRs and preparation of the Program EIR. In fact, through the course of the environmental review of the proposed Process, including receipt of public input, the number and rigor of the SPRs has increased to address all reasonably foreseeable, potential significant environmental effects. Rather than being disregarded, the public input has been instrumental in configuring the environmental protection features of the proposed Process.
- O2-19            For explanation of AUM's in the proposed Process, please refer to response to comment O2-15.
- The environmental resources identified in the Program EIR that would experience potentially significant environmental effects are wetlands and aquatic habitats, such as streams (because the SPRs and PSRs cannot entirely avoid the potential for encroachment of construction into wetland and aquatic resource areas). These are listed as Impacts 4.4-2 and 4.5-1. Potential environmental effects related to other issues would be avoided or reduced to less-than-significant levels by the SPRs and the evaluations conducted as part of the proposed Process.
- As discussed in Chapter 7, Alternatives, fewer change-in-use proposals could be implemented under the Complete Impact Avoidance Alternative, because existing trails often encounter or otherwise affect streams, sensitive habitats, sloped areas, or other sensitive resources. A system could be established to identify road and trail change-in-use projects that would entirely avoid significant environmental impacts to wetlands and aquatic habitats; however, this would diminish the ability of the alternative to meet the objective of facilitating consistent environmental review of change-in-use proposals, because more proposals would be infeasible to approve under the Process. CSP would consider the advantages and disadvantages of the alternatives when considering its action on the proposed Process.
- O2-20            There are multiple uses for the baseline condition data gathered for individual, future change-in-use proposals. As discussed on page 3-1 of the Draft Program EIR, CSP District staff would evaluate potentially viable change-in-use requests through a road or trail inspection, taking into account circulation, safety, road or trail sustainability, soils, geologic conditions, impacts to the resources and park operations. Details of the existing conditions inspection are used to develop a detailed conditions log that essentially describes a road's or trail's baseline conditions. CSP staff would use the detailed road and trail log to complete a "Use Change Survey" (Survey) and recommend one of the following: 1) approve the change in use; 2) deny the change in use; 3) conditional approval pending modification; 4) reroute of the existing road or trail; or 4) recommend a Unit Road and Trail Management Plan.
- A trail log would also be prepared immediately after construction that would document the baseline conditions of the trail once it has been constructed, but prior to reopening. As noted in response O2-15 above, AUM functions similarly to the CEQA-required (Guidelines Section 15097) Mitigation Monitoring and Reporting requirement, which helps to ensure that mitigation measures are implemented after project approval. It is generally an ongoing or periodic process of project oversight and ensures that project compliance is assessed on a regular basis after project implementation. Please also refer to response to comment O2-15 regarding AUM.
- O2-21            Please refer to response to comment O2-15 and O2-20 above regarding AUM and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR. The Process

- does not defer mitigation, because each subsequent project would incorporate SPRs and PSRs that appropriately address project-specific resource issues. The AUM process is simply a means to allow CSP to monitor the success of project requirements and respond appropriately, as necessary.
- O2-22 Please refer to response to comment O2-15 and O2-19.
- O2-23 During the review of change-in-use proposals, mitigation measures, SPRs, and PSRs, as needed, would be required, in addition to SPR GEN-9 (AUM). The “performance standards” are required as they are a component of SPR GEN-9 (AUM) and the AUM is a mandatory SPR for any change-in-use project approved under the Process. Please refer to Table 2-1 of the Draft Program EIR for two mitigation measures to be implemented with the Process and Chapter 3 of the Draft Program EIR for the list of SPRs. Please also refer to response to comment O2-15 regarding AUM and Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.
- O2-24 Pages 4.7-24 to 4.7-25, 4.10-22 to 4.10-24, and pages 4.10-27 to 4.10-28 of the Draft Program EIR summarize SPRs and site-specific BMPs that include measures (e.g., choke points) to control speeds of trail users, including mountain bikes. These measures are sufficient to control speeds, are likely more effective at controlling speed than a posted speed limit, and minimize associated soil disturbance and airborne dust. Nonetheless, a District has the discretion to provide trail signage that it believes is helpful for informing users about speed restrictions or other trail management matters. Please also refer to response to comment A6-3 and Master Response 2, Comments Related to Safety on Multi-Use Trails.
- O2-25 The comment quotes 2 paragraphs from the Draft Program EIR without further expression or interpretation. No response is required.
- O2-26 Please refer to response to comment O2-15.
- O2-27 Regarding enforcement of SPRs, please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails. Regarding accident and incident reports, please refer to response to comment O2-13. Please also refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.
- O2-28 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and response to comment O2-15 and O2-21.
- O2-29 As discussed in Chapter 7, Alternatives (p. 7-4), of the Draft Program EIR, the Complete Impact Avoidance Alternative would achieve the basic objectives of the project for the road and trail change-in-use projects that meet the stringent standard of complete significant impact avoidance, but the number of projects that may feasibly achieve that standard would be limited, and potentially too few to make this a feasible alternative for statewide use by CSP, which is one of the project objectives. SPR GEN-9 (AUM) provides flexibility to address unanticipated environmental effects, and mitigate as needed, site and project-specific conditions. Please also refer to response to comment O2-15
- O2-30 Establishing a baseline for all trails within the CSP system at the Program EIR stage is impractical as it is not known, nor can it be reasonably anticipated which trails would be proposed for a change in use and be evaluated using the proposed Process. Furthermore, setting performance standards for the AUM at the program level would be impractical, because environmental

conditions would vary by location and habitat type at each park. What may be applicable at a CSP unit in a desert region would likely be different from a CSP unit on the northern coast. Finally, the “best possible trail for equestrians” may not be the best trail for bikes, just as the best possible trail for bikes may not be the best possible trail for equestrians. Please refer to response to comment O2-15. For additional information on baseline conditions, please refer to response to comment O2-20.

O2-31 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, response to comment O2-15, and Master Response 2, Comments Related to Safety on Multi-Use Trails.

O2-32 Please refer to response to comment O2-19.

O2-33 The comment refers to a quote that appears to relate to the text on page 3-14 and 3-15 of the Draft Program EIR:

Qualified CSP staff would inspect the route and associated use areas that are affected by a change-in-use proposal at least semi-annually during the first three years following implementation of the change in use and would prepare an Adaptive Management Report (AMR) at the end of each year regarding achievement of the performance standards established for the project, consistent with CSP DOM 0313.1.1.5. The AMR would be available for public review at the District Headquarters. The report would include the results of observations of use and resource conditions noted for the performance standards, any degradation that exceeds the performance standard and response or remedial actions recommended to resolve the issue. A follow-up inspection would occur within three months following implementation of the remedial action to assess the effectiveness of any required remedies. If after re-inspection, park staff determine the remedy to be effective, no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent’s Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result of the AUM process, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded during the three years following implementation.

The monitoring conducted to implement AUM would be a required action after completion of a change-in-use project, not after a negative effect occurs. If the monitoring identified environmental degradation, the District would take action to resolve it. A quote listed in the comment appears to omit one important point contained in the Program EIR text. The omitted part relates to a follow-up inspection that would occur within three months following implementation of the remedial action to assess the effectiveness of any required remedies. If after re-inspection, CSP staff is unable to remedy an identified issue, any action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level would be implemented. Therefore, the response to an identified environmental degradation not only includes the actions to resolve it, but also a follow up check by the District to confirm resolution or identify the need for further action. Please also refer to page 3-14 and 3-15 of the Draft Program EIR and response to comment O2-15.

- O2-34 Please refer to response to comment O2-19. The comment provides no specific evidence that the analysis presented in the EIR is inadequate, inaccurate, or inappropriate.
- O2-35 Please refer to response to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and response to comment O2-19. Furthermore, suggesting that CSP is influenced by the “mountain biker lobby” is conjecture and is incorrect. CSP has a broad constituency reflecting many divergent interests and viewpoints for park management, resources management, and road or trail use. The comment provides no specific evidence that the analysis presented in the EIR is inadequate, inaccurate, or inappropriate.
- O2-36 A project would be disqualified from approval under the Process if, with implementation of GEN-9 (AUM), SPRs, PSRs, and mitigation measures, it would still result in a significant and unavoidable environmental impact. AUM can provide ongoing, periodic project oversight to ensure that project compliance is assessed on a regular basis after project implementation. Please also refer to response to comments O2-15 and O2-20.
- O2-37 Please refer to response to comment O2-7 and Master Response 2, Comments Related to Safety on Multi-Use Trails.
- O2-38 Please refer to response to comment O2-7 regarding aesthetic experience as an issue for the Program EIR.
- O2-39 Please refer to response to comment O2-24 and A6-3. The effect of trail user activities to erosion and off-site sedimentation is addressed in Impact 4.10-1, p.4.10-25, of the Draft Program EIR. Please also refer to response to comment O2-8 and O2-4. Speed control would be a fundamental element of use-appropriate design of a change-in-use project. As a result, the Program EIR’s impact analysis anticipates that travel speed would be in place.
- O2-40 The comment is noted for consideration during project review. No further response is necessary.
- Please refer to response to comment O2-4 and Master Response 2, Comments Related to Safety on Multi-Use Trails.
- O2-41 The comment regarding the importance of speed restrictions is noted for consideration during project review. Speed control would be a fundamental element of use-appropriate design of a change-in-use project. No further response is necessary.

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**Response  
03**

**Greg Suba, Conservation Program Director  
California Native Plants Society  
12/4/12**

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- O3-1 This comment does not provide specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The CNPS observation related to general level of scrutiny provided to projects tiered from programmatic EIR’s is noted for consideration during project review. No further response is necessary.

O3-2 The comment expresses concern with the programmatic approval of project-related “line of sight corrections” to a trail route that may include the removal of substantial amounts of native vegetation (e.g., chaparral), and potentially affect a sensitive plant species or vegetation community. The comment asks how CSP would determine whether vegetation removal would have a significant impact to plant populations and habitat, and how the determination would be made at the project level and cumulatively at the programmatic level.

As described in Section 3.6, Project Requirements and Change-in-Use Evaluation Process, a Project Evaluation Form (PEF) would be completed by CSP staff for each proposed project, to review and assess the potential resource impacts as a result of road or trail modifications. Please refer to Appendix E of the Program EIR for the PEF form. The PEF requires an evaluation of impacts to native plant communities and special-status plant species. Additionally, as described in Section 3.7, CEQA and Regulatory Compliance for Projects Consistent with the Change-in-Use Process, projects pursued through the Process would be subject to all applicable environmental laws and regulations, including the California Native Plant Protection Act, federal Endangered Species Act, and California Endangered Species Act. Through the PEF process, CSP would ensure that any new actions comply with the permit, consultation, and application requirements of agencies with jurisdiction, including state and federal endangered species consultation.

Additionally, several SPRs intended specifically to protect and minimize effects on native vegetation resources, including special-status plant species, were developed and incorporated into the proposed Process (see Section 4.4, Terrestrial Biological Resources, Pages 4.4-23—28 for applicable SPRs, including BIO-13 through BIO-28 of the Draft Program EIR). As described in Section 4.4, Impact 4.4-1 (Construction-Related Disturbance or Removal of Special-Status Plant Species), under the proposed Process, the potential removal of or damage to special-status plant species as a result of project excavation, grading, or other construction activities would be avoided by compliance with SPRs for vegetation (BIO-13 through BIO-17). The SPRs include conducting preconstruction plant surveys, flagging, and fencing of areas to be protected to ensure complete avoidance of impacts. If removal of or damage to special-status plant species as a result of construction or operation related to a change-in-use proposal cannot be avoided despite the environmentally protective influence of the SPRs and Adaptive Use Management, and the change-in-use proposal could not avoid significant environmental impacts or clearly mitigate them to a less-than-significant level, the proposal would be disqualified from approval under the proposed Process. The project would need to be reviewed independently with its own CEQA document.

Response  
04

**Steve Messer, Vice President**  
**Concerned Off-road Bicyclists Association**  
**12/4/12**

O4-1 The comment provides introductory information that does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. CORBA’s November 30, 2010 comment letter on the Notice of Preparation (NOP) was received and considered in preparation of the Program EIR. It was inadvertently left out of the Draft Program EIR appendix. Issues raised in this NOP letter are addressed in the Draft Program EIR

and this Final Program EIR. The letter is included in Volume 2 of this document for the purposes of the record.

O4-2 This comment makes recommendations for trail use suitability that do not raise environmental issues. No further response is needed. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of this Program EIR.

O4-3 The topic of the degree of technically challenging terrain is outside the scope of this Program EIR. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR. CSP acknowledges that the Process evaluated in the Draft Program EIR would not itself lead to an immediate increase in trails opened to multi-use. Individual change-in-use projects must first be proposed to District staff, after which they would be subject to evaluation under the proposed Process. Few roads and trails within CSP units are likely to be turnkey and/or mountain bike-ready without performing some level of maintenance or repair. In theory, even if there was an existing road or trail that could sustainably accommodate mountain bikes without maintenance or repair, a baseline conditions assessment must be prepared against which any impacts of its change-in-use can be evaluated.

The Process analyzed in this Program EIR does not, nor was it intended to identify a methodology by which any backlog of change-in-use requests could expeditiously be reduced. However, this Program EIR may be used to simplify future environmental documents for change-in-use proposals that are within the scope of the Program EIR, as well as others that are partially, but not entirely within the scope of this Program EIR. This could help reduce the time, labor, and expense associated with environmental review for qualifying change-in-use projects, because the current process used to evaluate proposed change-in-use requests in CSP units can vary somewhat from park unit to park unit and requires an independent CEQA document for all change-in-use projects.

O4-4 The comments related to previous history of CSP provided are not relevant to this CEQA analysis. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR. The comment stating that the existing change-in-use process has proven too expensive for many CSP Districts to implement is noted. However, the commenter provides no evidence to support this claim. Please also refer to response to comment O2-17. No specific information related to the environmental analysis was described; therefore, no further response can be provided.

O4-5 Please refer to response to comment O2-15, O4-3, and Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR.

O4-6 The commenter's interpretation of the cited code sections is not entirely accurate. CCR § 4359 limits horseback riding within CSP units to areas designated for horseback riding. CCR § 4360 states "No person shall operate an operator or gravity propelled device in any unit, or portion thereof, when the Department has issued an order prohibiting such activity. The Department may establish speed limits for units or portions thereof in which these devices are used. Speed limits will be posted." These sections of the code allow CSP to limit horseback riding to designated areas of CSP units and prohibit bicycling anywhere within a CSP Unit through issuance of an order. CCR § 4360 does not imply that all trails should be opened to bicycling.

Regardless of the clarification of the codes offered above, these code sections are not relevant to implementation of the Process or adequacy of the environmental analysis in the Draft

- Program EIR. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR.
- O4-7 For meaning and clarification of the term ‘Attraction in Themselves’ as it relates to CSP, please refer to Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”
- O4-8 The commentary regarding user experience is noted; however, it does not raise environmental issues, so no further response can be provided. Regarding the use of “standards,” if CSP finds a project to be entirely within the scope of the Program EIR or uses the Program EIR to facilitate preparation of CEQA document, CSP must incorporate all SPRs that are relevant to the proposed change in use and all feasible mitigation measures, as needed, to address significant or potentially significant effects on the environment. Consequently, they serve a more definitive purpose than just “guidelines.” The purpose and intent of SPRs are explained in Chapter 3, Project Description, of the Draft Program EIR. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR.
- O4-9 When referenced in the Draft Program EIR, the Trail Handbook (i.e., the correct name of the document noted in the comment as “Trail Manual”) is cited as “California State Parks, 1994.” Please refer to Section 10, References, for the chapters within which the handbook is cited.
- The 1994 Trail Handbook is among the referenced materials that have been available to the public as part of the EIR process. The Environmental Coordinator at the Northern Service Center of California State Parks has been the designated contact for reviewing Program EIR materials, as noted in Section 1.4.2.
- The Trail Handbook is in the process of being updated by CSP. Revisions are currently in preliminary form for review and deliberation among CSP staff. When the update is completed, it would also be available to the public. Because the Trail Handbook is not the subject of the proposed action, the request for public or peer review of a draft handbook and the frequency of updating the handbook are not relevant to the proposed Process. Therefore, no further response is required.
- O4-10 Where a change-in-use proposal involves resolution of an existing environmentally degraded condition, it is incorrect to assume that the addition of a use to the road or trail would not worsen the condition. The proposed process is organized to ensure that all work identified as in the Work Log as necessary for the change in use and all appropriate environmentally protective SPRs and PSRs resulting from the evaluation are in place before the use change occurs. Any applicable environmental laws and regulations that apply to a project not covered under this Program EIR would also be addressed through incorporation of PSRs for that project. Therefore, opening a road or trail to a new use before rectifying the existing environmental degradation or implementing the work and/or applicable SPRs and PSRs could result in significant environmental effects and would not be consistent with the proposed Process. Please also refer to response to comment O2-15.
- O4-11 The decision to provide dedicated staff to oversee the change-in-use Process statewide would have to be made at the CSP executive level. Please also refer to response to comment O2-17. Regarding backlog, please refer to response to comment O4-3. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the

- environmental document. The comment is noted for consideration during project review. No further response is necessary.
- O4-12 The policy of CSP is based on the premise that the lands involved have natural resources management as the primary goal, while providing for visitor use that is compatible with a park's natural resource qualities. Resource inspection is a foundational activity in maintaining resources and allows CSP to resolve damage before it causes significant loss or develops into more expensive problems. Furthermore, Section 15097 of the State CEQA Guidelines notes that to ensure that mitigation measures and/or project revisions are implemented and effective for an impact, the public agency must adopt a program for monitoring or reporting to ensure that the identified impact is avoided. If damage is found and resources are unavailable to deal with that damage, adaptive management requires that an area would be closed until the damage can be addressed. Please also refer to response to comment O2-15.
- O4-13 In Section 4.7 and 4.10 of the Draft Program EIR, linear rut development is an impact unique to bike users on trails and primarily as a result of excessive speed or use of trails under suboptimum conditions (i.e. muddy). This is based on CSP's collective knowledge in trail management over many years. Tire tread would be most likely cause of a linear-type rut; therefore, the need for a citation is unnecessary. As described in Section 4.7 and 4.10 of the Draft Program EIR, linear ruts are also a user impact common to OPDMD's.
- O4-14 As shown in Table 4.6.3 of the Draft Program EIR, there are only 20 Cultural Preserves out of the 278 park units in the system. Representing less than 10% of the total park units, these preserves represent a very small fraction of the overall acreage in the State Park system.
- A cultural preserve is an internal unit of an existing State Park, State Recreation Area or State Vehicle Recreation Area. The primary goal of these delineated zones is for focused management based on preservation. These designations incorporate park lands that contain rich and outstanding prehistoric and historic resources which include archaeological sites, village locations, burial grounds, rock art panels, trails, ranches, structures and cultural landscapes.
- Although the DOM does not specifically exclude bicycle use within such preserves, the decision to allow multi-use or any type of user group onto roads and trails located within cultural preserves would be determined on a project-by-project basis by CSP resource staff to ensure consistency with the primary goal of these preserves.
- O4-15 Based on CSP's collective experience, user conflict between bicyclists and other user groups often result in the need for bicyclists to stop abruptly, potentially contributing to erosion and off-site sedimentation. As discussed in Chapter 1, Introduction, of the Trail Use Conflict Study (see Appendix C of the Draft Program EIR), the literature review and agency survey results indicate that complaints and controversy about other trail users are common and that mountain bikers' speeds are the primary reported cause for multi-use trail conflicts.
- O4-16 The document analyzes the proposed Process intended to facilitate consideration of changes in uses on existing CSP roads and trails that best accommodate accessibility and recreational activities appropriate for each road or trail facility. This document does not assess whether or not a CSP road or trail should be multi-use. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR.

- O4-17 A breakdown of trail miles within designated wilderness areas would not add information relevant to the potential environmental effects of the proposed Process. For purpose and intent of this Program EIR, please refer to Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR. The commenter offers no information or evidence that analysis presented in the Draft Program EIR is inadequate; therefore, no further response can be provided.
- O4-18 Access to points of interest and connectivity to other trails is a consideration in evaluating a trail's suitability for multi-use. However, it is not CSP's intent to provide technically challenging multi-use trails. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR, and response to comment O2-38. Along with the objectives of providing recreation opportunities for California, any change in use must also be consistent with existing CSP mandate to protect natural and cultural resources (page 2-3 of the Draft Program EIR).
- O4-19 The paragraph referenced in the comment is on p. 8-4 of the Draft Program EIR:
- “Because CSP trails are not intended for or appropriate as active recreation attractions on their own (e.g., for high-speed adventurous travel, demonstration of technical skills, and permitted events at some CSP units), but as a means of public access to the natural, scenic, cultural and ecological values of the State Park System, CSP trails will benefit from considering design criteria that specifically aim to reduce conflict among trail users. The Trail Use Conflict Study proposes a Checklist for Low-Conflict Multi-Use Trail Design that includes such criteria (see Table A-1 in Appendix C). While many of these criteria are already in use by CSP, the checklist focuses on the key issues related to reducing trail use conflict such as mountain bike speed, sight distance, tread width and passing space. CSP will continue to incorporate use-appropriate, low-conflict, multi-use design features into State Park System trails, as changes in use are proposed “
- No statement was made that called out mountain biking specifically as “active recreation.” The reference was to high-speed and/or adventurous travel or technical skills demonstration, which could apply to mountain bikers, equestrians, and trail runners. Regardless of which type of user may be actively recreating, that type of use is not appropriate on CSP trails because it increases the risk of trail use conflict and is inconsistent with CSP policies. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.
- O4-20 The riding preference of users or amount of single-track trails available to mountain bikers is irrelevant to this CEQA analysis. While the addition of single track trail miles may be a priority to CORBA, it is not the “primary subject of the change-in-use process,” as stated in this comment. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.
- O4-21 This comment refers to Appendix C, Trail Use Conflict Study, of the Draft Program EIR. Back country is defined in Section 2.6.1 (p.2-10) of the study [i.e. “Park areas that are relatively remote, and fewer users would be able to visit because of distance from trailheads and terrain”] and is consistent with CSP's definition. The minimum tread widths referenced in the study are recommendations for back country trails. This comment does not raise environmental issues or

concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

O4-22 Comment noted. While this comment is outside the scope of the Program EIR, this recommendation would be forwarded on to be considered in the updated Trail Manual.

O4-23 The intent of the deliberateness in the measurements is to ensure that the pinch points are of sufficient design and scale to preclude their use as technical features. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

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**Response  
05** **Tom Ward**  
**International Mountain Bicycling Association**  
**12/4/12**

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O5-1 The commenter's appreciation for CSP taking steps to promote multi-use trails is noted. As discussed in Chapter 3, Project Description, of the Draft Program EIR, multi-use trails have long been the established policy for trail planning in California due to reduced construction and maintenance costs as well as reduced resource impacts, compared to provision of separate trails for each user group.

The commenter's encouragement for CSP to provide more trail opportunities for cyclists is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.

The commenter's appreciation for the Draft Program EIR's acknowledgement that there are effective tools and methods to successfully manage multi-use trails and appreciation for the Trail Use Conflict Study (Study) is noted. The Study, in its entirety, is located in Appendix C of the Draft Program EIR. A summary of the Study, applicability of trail use conflict under CEQA, and California State Park's (CSP) approach to trail use conflicts as it relates to changes in use is provided in Chapter 8, Trail Use Conflicts, of the Draft Program EIR. The commenter is correct in that the Study finds that incidents and accidents between trail users is relatively rare. However, the Study did not find that conflicts and complaints are few. As discussed in Chapter 1 of the Study (see Appendix C of the Draft Program EIR), the literature review and agency survey results found that accidents are rare compared to the number of incidents, and actual incidents tend to be rare in relation to extent of comments and complaints about conflict between trail user types. Study findings indicate that complaints and controversy about other trail users are common and that mountain bikers' speeds are the primary reported cause for multi-use trail conflicts.

O5-2 CSP acknowledges that trail miles for certain trail user groups have not increased in the state park system as fast as some would prefer. Furthermore, conversion of additional trails to multi-use would continue to be limited by the availability of funding. Nevertheless, the Program EIR would ultimately facilitate additional change-in-use projects that would create opportunities for all users.

The current process used by CSP to evaluate proposed change-in-use requests can vary somewhat from park unit to park unit and require an independent CEQA document for all change-in-use projects. The Process is intended to evaluate potential road and trail change-in-use proposals, facilitate the review of those proposals, and make more consistent the environmental review of change-in-use proposals in park units statewide. As stated in Section 3.4, Objectives of the Process, of the Draft Program EIR, one of the objectives of the proposed Process is to provide an objective and consistent evaluation tool and process to inform decision-making. This objective and systematic approach for making decisions would allow CSP to provide a more consistent environmental review process for change-in-use proposals throughout all CSP districts in California. This approach should allow for a less cumbersome environmental review process for qualifying change-in-use projects.

This Program EIR may be used to simplify future environmental documents for change-in-use proposals that are not entirely within the scope of this Program EIR. This could help reduce the time and expense associated with environmental review for qualifying change-in-use projects. As noted in CCR Section 15168(c) of the State CEQA Guidelines, subsequent proposed change-in-use projects that are consistent with the Process would be examined in light of the information in this Program EIR to determine whether an additional environmental document must be prepared. If CSP finds that, pursuant to CCR Section 15162 of the State CEQA Guidelines, no new effects could occur or new mitigation measures would be required on a subsequent project, the activity can be approved as being within the scope of the project covered by this Program EIR, and no new environmental documentation would be required, with the exception of a Notice of Determination (NOD) should CSP determine that a project is within the scope of the Program EIR. As discussed in Chapter 3, Project Description, of the Draft Program EIR, simplification of future documents could include focusing subsequent EIRs or mitigated negative declarations (MND's) on any new significant effects that were not covered in the Program EIR. In this case, an initial study could be used to identify the new potential significant effects for the subsequent environmental document. Information from the Program EIR may also be incorporated by reference in future environmental documents to describe statewide or regional effects that apply to the Process as a whole, or for cumulative impacts related to a change-in-use proposal that requires its own independent EIR or MND. However, if a change-in-use proposal does not qualify for approval using the Process, it would require its own independent CEQA document.

This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

- O5-3 Please refer to response to comment O4-4 and O5-2. Approval of the Program EIR for the Road and Trail Change-in-Use Evaluation Process would not necessarily result in an immediate increase in multi-use trail miles; rather, the Process would result in a more uniform process by which potentially viable multi-use trails can be identified and evaluated.
- O5-4 Please refer to response to comment O4-6.
- O5-5 The decision to provide dedicated staff, a citizen oversight committee, or trail ombudsman to oversee the change-in-use Process Statewide would have to be made at the executive level. Regarding cost, please refer to response to comment O2-17. For purpose of this Program EIR, please refer to Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR. This comment does not raise environmental issues or concerns regarding the

- adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.
- O5-6 Based on CSP collective experience and as expressed in Section 4.14, Recreational, of the Draft Program EIR (p.4.14-2), traveling by foot allows hikers to adjust most flexibly to varying trail conditions (CSP 2011; pg. 7). This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.
- O5-7 CEQA requires that determination of significant impacts be based on substantial evidence and not on speculation or unsubstantiated opinion. This comment cited no specific instances where the Draft Program EIR included speculation on the motivation of mountain bikers; all information used in the EIR was subject to peer review to assess its validity. CSP recognizes that while a majority of mountain bikers adhere to the “rules of the trail,” a small minority of users that may cause trail conflicts can greatly influence the perceptions of other user groups. As stated in the Trail Use Conflict Study (Study) included in Appendix C of the Draft Program EIR, study findings indicate that mountain bikers’ speeds are the primary reported cause for multi-use trail conflicts. Please also refer to response to comment O2-13.
- O5-8 This comment is an anecdotal and is not substantiated. The commenters do not describe specific trails about which CSP can offer a response. What the commenters may perceive as functioning adequately may overlook factors important to other user groups, which could lead others to a different conclusion. The intent of the change-in-use process is to ensure as much as feasible the safety of all user groups and provision of access opportunities consistent with the CSP policies. Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.
- O5-9 The comment refers to standards discussed under the Water Quality Section in the Draft Program EIR that are intended to provide long-term trail integrity and sustainability. Both guidelines and standards can refer to best practices, which was the intent in the discussion. Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.
- O5-10 The CSP Trails Handbook is an internal management and field tool providing guidelines for training of CSP staff for trail construction and planning. Although the document is available to the public, its preparation does not require a public input process.
- O5-11 Impact 4.9-4 of the Draft Program EIR lists both engineered and non-engineered options for design features (i.e. tread width, passing space dimensions, sight distance, speed control, turning radius, surface texture, signage, and enforcement, etc.). Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. In CSP’s experience, the alternating of use periods has been largely unsuccessful. However, the appropriateness of a one-way traffic design option or alternate use schedule for a project would be decided at the project level. CSP agrees that not all change-in-use projects would require physical modifications, but CSP has insufficient data to conclude that “most” trails would only require minimal work to accommodate multi-use.
- O5-12 Please refer to response to comment O2-17. The Process would hold all types of recreational users, not just bicyclists, to the same level of scrutiny. Moreover, opening trails to other users still requires baseline surveys of the trail to be conducted. Therefore, a 12-month review

process is unrealistic, particularly given current budget constraints. The commenters preference on how CSP should move forward with the change-in-use process does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

- O5-13 Please refer to response to comment O4-6. As stated on page 3-1 of the Draft Program EIR, “Any change in use must be consistent with the objective of natural and cultural resource protection, along with the objectives of providing recreation opportunities for California residents, visitors, and user groups.” Projects pursued through the Process would also be subject to other applicable environmental laws and regulations. The decision to add or remove a particular recreational use on an existing CSP road or trail would be the responsibility of the District within which the project is located. While the input of recreation users and groups is important and considered by the District, the decision would be based on an objective evaluation of the proposal; environmental data, laws, and regulations; and implementation of the CSP Trail Policy. Amending CCR 4359 and/or 4360 would better allow CSP to ensure that all of these objectives are properly balanced. The commenter offers no information or evidence that analysis presented in the Draft Program EIR is inadequate; therefore, no further response can be provided.
- O5-14 As shown in Table 4.6.3 of the Program EIR, there are only 20 Cultural Preserves out of 278 park units in the system. While representing less than 10% of the total park units, these preserves represent only a very small fraction of the overall acreage in the State Park system.
- The purpose of a Cultural Preserve is to protect the integrity of places that contain historic or prehistoric sites or similar evidence of past human lives or cultures. Although the CSP Departmental Operations Manual does not specifically exclude bicycle use within such preserves, it also does not state that multi-use, including bikes, may be appropriate on trails through such preserves. Projects determined by resource staff to be inconsistent with the goals of protecting these sites would not be permitted. Furthermore, CSP would likely only consider multi-use trails through cultural preserves where no other viable alternative exists.
- O5-15 Please refer to Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.” This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.
- O5-16 The commenter does not specify where discussion of special use trails occurs in the document. Furthermore, the Program EIR addresses change in use of existing roads and trails, not the creation of new special use trails. Regarding technically challenging trails, please refer to Master Response 1, Clarification Related to The Purpose and Intent of This Program EIR, response to comment O2-38, and Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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| <b>Response<br/>06</b> | <b>Lyle Wright<br/>Lake Oroville Bicyclists Organization Trails Advocate<br/>12/2/12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| O6-1                   | The commenters support and approval of the Draft Program EIR is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>07</b> | <b>Eric Bruins, Planning and Policy Director<br/>Los Angeles County Bicycle Coalition<br/>11/1/12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| O7-1                   | The commenter offers no information or evidence that analysis presented in the Draft Program EIR is inadequate. The comment is noted for consideration during project review. No further response can be provided.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| O7-2                   | As discussed in Chapter 3, Project Description, of the Draft Program EIR, one of the objectives of the proposed Process to implement the CSP Trail Policy, including providing multi-use trails and trail connectivity (p. 3-8). The proposed Process would be considered within the broader scope of corridors, connections, and linkages to roads and trails on surrounding federal, regional, county, and city lands. Connectivity to other trails is a consideration under the Process in evaluating a trail's suitability for multi-use. The comment is noted for consideration during project review. No further response is necessary.                                                                                                                                                              |
| O7-3                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Response<br/>08</b> | <b>R. Dale Gibson, President<br/>Los Angeles Equine Advisory Committee<br/>11/29/12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| O8-1                   | The comment provides prefatory remarks to the more detailed comments contained in the letter.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| O8-2                   | As indicated in Exhibit 3-2 of the Draft Program EIR, notification to stakeholders would occur after CSP has conducted evaluations to assess whether a change-in-use of a particular trail is potentially viable, because many trails may be deemed unsuitable for multi-use. Under the Process, the timing of CEQA public review and public notice distribution for change-in-use projects would fully conform to the legal requirements of CEQA. Please also refer to response to comment O1-6. The comment does not specify how the consideration of trail use was absent from the Program EIR. This comment does not raise environmental impact issues or concerns regarding the adequacy, accuracy, or completeness of the analysis in the environmental documents. No further response is necessary. |

- O8-3 Change-in-use requests are logged at the District in which the park unit and road or trail are located. The log of road or trail change-in-use requests would be retained for five years following the District's decision regarding the request. All logs of proposed change-in-use projects can be obtained by requesting a copy from the District office.
- O8-4 Please refer to Appendix E of the Draft Program EIR for the Trail Use Change Survey and Project Evaluation Form.
- O8-5 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.
- O8-6 Regarding trail design, please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

For discussion of traditional trail users, please refer to response to comment O2-7. Although not a CEQA-issue, trail use conflict is discussed in Chapter 8 and Appendix C of the Draft Program EIR. The provisions of CEQA regard human conflict and emotions (i.e. fear and anxiety) on recreational roads and trails as a social issue that does not qualify, by itself, as an environmental impact. Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails. For information on baseline conditions, please refer to response to comment O2-20. Monitoring of potential environmental impacts is provided through SPRs and AUM. Please refer to response to comment O2-15.

Qualified CSP District staff (District staff) would evaluate potentially viable change-in-use requests through a road or trail inspection, taking into account circulation, safety, road or trail sustainability, soils, geologic conditions, impacts to the resources and park operations. Details of the existing conditions inspection are used to develop a detailed conditions log that essentially describes a road's or trail's baseline conditions. CSP staff would use the detailed road and trail log to complete a "Use Change Survey" (Survey) and recommend one of the following: 1) approve the change in use; 2) deny the change in use; 3) conditional approval pending modification; 4) reroute of the existing road or trail; or 4) recommend a Unit Road and Trail Management Plan.

- O8-7 Consistent with CEQA guidelines, responsible agencies would be notified of a change-in-use project during the CEQA review period, if an MND is prepared. If a NOD is filed, the responsible agency would need to review the State Clearinghouse database for notification. Agencies on a local trail advisory committee would be notified under both circumstances. Please refer to response to comment O8-2. Several of the SPRs listed in Chapter 3 of the Draft Program EIR also require coordination with local agencies and jurisdictions. Please also refer to response to comment O7-2.
- O8-8 The proposed Process includes documentation at several points that would become part of the District's log and file regarding a change-in-use proposal, as described in Section 3.6 of the Draft Program EIR, pages 3-10 to 3-15, including the summary flowchart. Documentation would include the change-in-use request, road and trail log of conditions, change-in-use survey, and a project evaluation form. Please see Appendix E for examples of the survey form and project evaluation form. This documentation is necessary to form the substantial evidence basis for the District's determination of whether the proposal is within the scope of the Program EIR or requires its own additional CEQA document. All of the decision-supporting documentation for a

change-in-use proposal would be kept as part of the project log and file, and would, therefore, be available to the public. Please refer to response to comment O8-3.

- O8-9 The monitoring of environmental conditions may be recorded in various ways as outlined in Chapter 3 of the Draft Program EIR and SPRs throughout Chapter 4. Photographs can be an effective method and may be one of the ways that District staff keeps record of environmental change after a change-in-use has been implemented. The District personnel retain the discretion to determine the most efficient and effective strategy for recording the monitoring information. Please also refer to Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.
- O8-10 Please refer to Master Response 1 through 4. Regarding public notice timing, please refer to response to comment O8-2.

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**Response  
09**

**Erik Schmidt, Off-road Director  
Marin County Bicycle Coalition  
12/3/12**

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- O9-1 The comment provides introductory information and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.
- O9-2 This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.
- O9-3 Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses and response to comment O5-8.
- O9-4 Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails. This comment provides suggestions in different ways trail use conflict can be managed and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

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**Response  
010**

**Susan Stompe, President and Nona Dennis, Chair – Parks and Open Space Committee  
Marin Conservation League  
12/4/12**

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- O10-1 The comment provides introductory information and prefatory remarks to the more detailed comments contained in the letter.
- O10-2 The timing of public input in the proposed Process is designed to occur after sufficient information is gathered to understand the actions needed for a change-in-use proposal, how well it meets the evaluation criteria, and its potential environmental constraints, but before a

decision is made about the proposal. This timing is optimal for gathering meaningful public input, because the District could make available to local trail user groups, committee, or interested public sufficient data and analysis for well-informed review and comments. The decision has not been made prior to the preparation of a Construction Work Log (which is essentially a proposed “project description” that becomes the physical expression of the change-in-use proposal for environmental and merits review) and the CEQA review so user groups and the public are not excluded prior to the District’s decision. Please also refer to response to comment O1-6 and O8-2.

O10-3 Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and response to comment O2-8.

O10-4 Potential light and glare impacts were adequately addressed in Section 4.2 of the Draft Program EIR. As discussed under Impact 4.2-3 of the Draft Program EIR (p.4.2-11), nighttime trail use is generally not permitted in the State Park System, because parks are closed between sunset and sunrise and the majority of trailhead parking areas close to users at dusk or the arrival of darkness. Nighttime trail use would generally be limited to overnight visitors, such as those camping in the park. Regardless, night lighting equipment used by hikers and bicyclists (headlamps, flashlights, bike lanterns, etc.) generally emits very little light, typically enough to see 10-20 feet of trail. The proposed Process would allow the removal of existing users or addition of new users (e.g., bicyclists and/or equestrians) to an existing road or trail; however, the presence of nighttime lighting would not change substantially, because nighttime road and trail use policy would remain the same with a change-in-use project (i.e., generally closed to nighttime use, except by overnight visitors). New trail users types would also employ the same types of lights as current users, i.e., those intended for the purpose of trail visibility.

Potential erosion impacts, including those caused by volunteer trails, were adequately addressed in Section 4.7 of the Draft Program EIR. Specifically, SPR GEO-26 would require construction or repair of barriers at switchbacks to discourage shortcuts and the creation of volunteer trails.

The comment provides no specific evidence that the analysis presented in the EIR is inadequate, inaccurate, or inappropriate. No further response is necessary.

O10-5 The commenter correctly points out that the Draft Program EIR includes variability in the frequency and duration of monitoring for Adaptive Use Management (AUM) related to changes in use. In the Draft Program EIR, different SRPs describe the duration of the AUM monitoring period as lasting either three years, between three and five years, or five years. This variation in duration was not intentional and is corrected to state “up to five years” in all cases. Revisions to the text of the SRPs in the Program EIR are presented at the end of this response.

It is appropriate to set a duration limit for the AUM monitoring for purposes of good stewardship of resources and the fiscal constraints of planning for staff levels at the park. The duration of AUM monitoring related to a change-in-use project need not be perpetual, because within the first full budget planning cycle after implementation of a change-in-use project, the regular, ongoing, maintenance and resources management programs of a park would begin to take over as the process that is responsible for managing the involved trail or road. Based on CSP experience regarding recreation use patterns in state parks, up to five years would also provide a reasonable period for the level of use to adjust to the road or trail use change and settle into a long-term pattern of frequency, volume of visits, and types of users.

Revisions are made in the Program EIR to make the duration of AUM monitoring consistent throughout the proposed Process, as follows:

***Page 3-14 and 3-15 of the Draft Program EIR is revised as follows:***

Qualified CSP staff would inspect the route and associated use areas that are affected by a change-in-use proposal at least semi-annually during the first ~~five~~ three years following implementation of the change in use and would prepare an Adaptive Management Report (AMR) at the end of each year regarding achievement of the performance standards established for the project, consistent with CSP DOM 0313.1.1.5. The AMR would be available for public review at the District Headquarters. The report would include the results of observations of use and resource conditions noted for the performance standards, any degradation that exceeds the performance standard and response or remedial actions recommended to resolve the issue. A follow-up inspection would occur within three months following implementation of the remedial action to assess the effectiveness of any required remedies. If after re-inspection, park staff determine the remedy to be effective, no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent's Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result of the AUM process, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded during the ~~five~~ three years following implementation.

~~Between three and five~~ For up to five years after implementation of a change-in-use proposal, qualified CSP staff would inspect the route and associated use areas that are affected by the proposal at least semi-annually and would prepare an AMR at the end of each year regarding achievement of the performance standards established for the project. The AMR would be available for public review at the District Headquarters. The report would include the results of observations of use and resource conditions noted for the performance standards ("Condition Assessment"), any degradation that exceeds the performance standard and response or remedial actions recommended to resolve the issue is implemented. The follow-up inspection would occur within six months to assess the effectiveness of any required remedies. If after re-inspection, park staff determines the remedy to be effective, no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent's Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded for a sufficient time to allow incorporation of the road or trail with its changed use into the routine, long-term resources management activities of the park.

***Page 4.4-41 of the Draft Program EIR is revised as follows:***

Qualified CSP staff would inspect the route and associated use areas that are affected by a change-in-use proposal at least semi-annually during the first ~~three~~ five years following

implementation of the change in use and would prepare an Adaptive Management Report (AMR) at the end of each year regarding achievement of the performance standards established for the project, consistent with CSP DOM 0313.1.1.5. The AMR would be available for public review at the District Headquarters. The report would include the results of observations of use and resource conditions noted for the performance standards, any degradation that exceeds the performance standard, and response or remedial actions recommended to resolve the issue. A follow-up inspection would occur within three months following implementation of the remedial action to assess the effectiveness of any required remedies. If after re-inspection, park staff determine the remedy to be effective, no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent's Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result of the AUM process, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded during the ~~three~~ five years following implementation.

~~Between three and five~~ For up to five years after implementation of a change-in-use proposal, qualified CSP staff would inspect the route and associated use areas that are affected by the proposal at least semi-annually and would prepare an AMR at the end of each year regarding achievement of the performance standards established for the project. The AMR would be available for public review at the District Headquarters. The report would include the results of observations of use and resource conditions noted for the performance standards ("Condition Assessment"), any degradation that exceeds the performance standard and response or remedial actions recommended to resolve the issue is implemented. The follow-up inspection would occur within six months to assess the effectiveness of any required remedies. If after re-inspection, park staff determines the remedy to be effective, no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent's Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded for a sufficient time to allow incorporation of the road or trail with its changed use into the routine, long-term resources management activities of the park.

***Page 4.7-27 of the Draft Program EIR is revised as follows:***

Environmental impacts are assessed by the significance criteria listed in Section 4.6.3, Significance Criteria. In some cases, multiple significance criteria are listed under each potential environmental impact. Each impact is assessed and evaluated to determine whether significant environmental effects could be avoided based on the application of SPRs listed above. In addition to the implementation of SPRs, the Adaptive Use Management (AUM) process as described in Section 4.1, Programmatic Environmental Impact Analysis Approach, will provide additional assurance that impacts to geology and soils are maintained at less-than-significant levels. At the start of the Process, CSP staff will develop baseline and existing erosion geology and soil conditions of the existing road

or trail proposed for changes in use and adjacent areas during the Change-In-Use Survey. Once baseline conditions are established, Project-Specific Requirements (PSRs) with performance standards will be developed for the proposed change-in-use project. These PSRs will be developed from CSP BMP documents, DOMs, and Trail Handbook guidelines with the goal to reduce impacts to geology and soils. CSP staff will monitor the trail and affected areas over a period of ~~three~~ up to five years for effects associated with elevated use, change-in-user types, trail design performance, and any lasting effects from trail design and construction activities. If the trail affected by the change-in-use proposal exhibits geologic instabilities or soil erosion at significant levels, CSP staff will develop a mitigation plan to reduce the effects to less than significant. If mitigation efforts could not reduce the environmental effects, then a Superintendent's Order may be necessary to rescind or change the conditions of the change in use.

***Page 4.10-24 of the Draft Program EIR is revised as follows:***

At the start of the proposed Process, CSP staff will develop baseline hydrologic, water quality, and potential and existing erosion conditions of the road or trail proposed for change in use and adjacent areas during the Survey. Once baseline conditions are established, specific project-related performance standards will be developed for the proposed change in use. These performance standards will be developed from CSP BMP documents, DOM's, and Trail Handbook guidelines with the goal to reduce erosion and sedimentation, maintain and preserve natural hydraulic flow patterns, and maintain high water quality. CSP staff will monitor the trail and affected areas over a period of ~~three~~ up to five years for effects associated with elevated use, change in user types, trail design performance, and any lasting effects from trail design and construction activities. If the trail affected by the change-in-use proposal exhibits erosion and sedimentation at significant levels, disrupted hydraulic flow patterns, or degraded water quality, CSP staff will develop a remediation plan to address the issue. If remediation efforts fail to resolve the issue, then a Superintendent's Order may be necessary to rescind or change the conditions of the change in use.

***Page 4.14-7 of the Draft Program EIR is revised as follows:***

Although the potential for increased use would not be expected to result in significant environmental impacts, CSP recognizes that uncertainty exists. District personnel would use Adaptive Use Management (AUM), one of the SPRs described in Section 3.6.4 and 3.8 of this Program EIR, to prevent any potential significant environmental impacts from occurring as a result of an increase or other change in recreational use resulting from a change-in-use project. The strategy involves monitoring of the affected trail and associated use areas by qualified CSP staff semi-annually for the first five years after the change in use is implemented. An Adaptive Management Report would be prepared at the end of each year regarding achievement of the performance standards established for the project. Based on this, CSP would take action to remedy any resource degradation and avoid any significant adverse impacts that may potentially occur as a result of adding a use or increasing the level of trail use.

O10-6

The commenter indicates that five years should be established as the AUM monitoring period and expresses concern about the long-term condition of resources after the conclusion of the AUM monitoring. Regarding the duration of the AUM monitoring, CSP agrees with the

monitoring duration and has made appropriate revisions in the Program EIR. Please also see response to comment O10-5.

The commenter also recommended that the frequency of monitoring should be increased and the timing should be seasonally adjusted for sensitive species, where needed to discern if certain consequences are occurring, such as wildlife damage. Some of the details of monitoring techniques, seasonal timing, and frequency would need to be defined based on the project-specific facts about resource conditions present. The District would have the discretion to adjust the timing and frequency of monitoring according to the environmental conditions of a proposed change-in-use project, within the overall performance criteria to avoid significant environmental effects, as described in the other SPRs and in any PSRs.

Regarding long-term management, it is reasonable to expect, and CSP experience has been, that within five years the pattern of use on a road or trail with a change-in-use project would equilibrate to a long-term condition (i.e., no long experience the short-term variations in use pattern or use level because of the change approved for the trail). Park visitors would be reasonably expected to have gained full knowledge of and familiarity with the road or trails' resources and landscape conditions following the use change, so their decisions about using the road or trail would have become a regular part of their recreation visitation behavior. It is also CSP's experience that visitors observing issues/problems on or within park facilities often call these to CSP's attention and corrective actions can be promptly implemented. A five-year period is a reasonable time for such visitor comments to be received, if road or trail use issues or environmental consequences are occurring. After five years, District personnel would continue to observe road and trail use as a part of routine duties; only the formal monitoring required for the approval of a change-in-use proposal would run its course and conclude.

Recognizing that the long-term visitation patterns would be established within five years, the impacts of the change in use would also have blended into the other factors affecting visitation at the park and no longer be distinct as a separate environmental effect. Regardless, Districts would also be able to account for the resources management strategies, maintenance requirements, and staffing needs associated with the long-term use patterns in the normal annual budgeting process. Therefore, as stated in the Draft Program EIR, Section 3.6.4, the routine management responsibilities of the District would take over after five years for the road or trail and its changed use.

O10-7 Regarding enforcement, please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails. Please also refer to O2-8.

**Response  
011**

**Curt Kruger, Trails Committee Chair  
Marin Horse Council  
11/28/12**

O11-1 Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. The comment provides no specific evidence that the analysis presented in the EIR is inadequate, inaccurate, or inappropriate. The comment is noted for consideration during project review. No further response is necessary.

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| <b>Response<br/>012</b> | <b>Amy Wynn, Vice President<br/>Mendocino Coast Cyclists, Inc.<br/>11/10/12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| O12-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Response<br/>013</b> | <b>Alan Carlton, Attorney at Law<br/>Sierra Club, California<br/>11/22/12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| O13-1                   | The commenter provides Sierra Club policy for vehicles (including bikes) on trails. The Process provides CSP with an objective evaluation tool and process to effectively and efficiently make decisions for change-in-use proposals. Please refer to Chapter 3, Project Description, of the Draft Program EIR, and Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. Monitoring of potential environmental impacts is provided through SPRs and AUM. Please refer to response to comment O2-15. The comment provides no specific evidence that the analysis presented in the EIR is inadequate, inaccurate, or inappropriate. The comment is noted for consideration during project review. No further response is necessary. |
| O13-2                   | Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. The comment provides no specific evidence that the analysis presented in the EIR is inadequate, inaccurate, or inappropriate. The comment is noted for consideration during project review. No further response is necessary.                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Response<br/>014</b> | <b>Kevin Joell, President<br/>Tahoe Area Mountain Biking Association<br/>12/4/12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| O14-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses, and response to comment O2-17.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| O14-2                   | Please refer to Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| O14-3                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.                                                                                                                                                                                                                                                                                                                                                                                                                |

O14-4            The commenters request for a trail to be considered for multi-use is unrelated to the proposed Process being analyzed in this Program EIR and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of this Program EIR. No further response is necessary.

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| <b>Response<br/>P1</b> | <b>Abronson, Stephanie<br/>10/16/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| P1-1                   | See Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| P1-2                   | Trail re-alignment of specific trails and their cost to taxpayers is not an environmental topic; therefore, it is not addressed in the Draft Program EIR. No further response is necessary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P1-3                   | The Process does not address trails that have been realigned in the past. See Master Response 1, Clarification Related to the Purpose and Intent of this Program EIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| P1-4                   | <p>Section 15131(a) of the State CEQA Guidelines states that:</p> <p>Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.</p> <p>Because issues of cost and the social and behavioral issues raised in the comment are not physical environmental changes, they do not need to be addressed in the EIR.</p> <p>The commenter also refers to a Sierra Club statement that recommends that “trails should lie lightly on the land without such massive destruction of the native habitat.” Native habitat impacts are an environmental effect that addressed in the Draft Program EIR. Please see Section 4.4, “Terrestrial Biological Resources,” and 4.5, “Aquatic Biological Resources.” Because this comment does not provide specific information related to the adequacy or accuracy of the Draft Program EIR, no further response is necessary.</p> |
| P1-5                   | The commenter’s opposition to mountain biking on public trails is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P2</b> | <b>Abronson, Stephanie<br/>10/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| P2-1                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Response<br/>P3</b> | <b>Adams, Randall<br/>11/29/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| P3-1                   | The commenter’s appreciation for CSP taking steps to promote multi-use trails is noted. As discussed in Chapter 3, Project Description, of the Draft Program EIR, multi-use trails have long                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

been the established policy for trail planning in California because of reduced construction and maintenance costs, as well as reduced resource impacts, compared to provision of separate trails for each user group.

The commenter's encouragement for CSP to provide more trail opportunities for cyclists is noted. As discussed in Chapter 2, Executive Summary, of the Draft Program EIR, the document analyzes the proposed Process intended to facilitate consideration of changes in uses on existing CSP roads and trails that best accommodate accessibility and recreational activities appropriate for each road or trail facility. The Program EIR does not assess whether or not a CSP road or trail should add or remove a particular recreational use on specific trails. The proposed Process would provide CSP with an objective process and evaluation tool to assess change-in-use proposals that modify roads and trails. Therefore, any change-in-use requests made by recreational users, including bicyclists, would go through the same objective process and evaluation. Consistent with the mandate of the California Recreational Trails Plan, CSP provides for broad trail access, rather than focusing on individual user groups. Please also refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.

The commenter's appreciation for the Draft Program EIR's acknowledgement that there are effective tools and methods to successfully manage multi-use trails and appreciation for the Trail Use Conflict Study (Study) is noted. The Study, in its entirety, is located in Appendix C of the Draft Program EIR. A summary of the Study, applicability of trail use conflict under California Environmental Quality Act (CEQA), and CSP's approach to trail use conflicts as it relates to changes in use is provided in Chapter 8, Trail Use Conflicts, of the Draft Program EIR. The commenter is correct in that the Study finds that incidents and accidents between trail users is relatively rare. However, the Study did not find that conflicts and complaints are few. As discussed in Chapter 1 of the Study (see Appendix C of the Draft Program EIR), the literature review and agency survey results found that accidents are rare compared to the number of incidents, and actual incidents tend to be rare in relation to extent of comments and complaints about conflict between trail user types. Study findings indicate that complaints and controversy about other trail users are common and that mountain bikers' speeds are the primary reported cause for multi-use trail conflicts.

The current process used to evaluate proposed change-in-use requests in CSP can vary between park units and requires an independent CEQA document for all change-in-use projects. The Process is intended to evaluate potential road and trail change-in-use proposals in CSP units, facilitate the review of those proposals, and make more consistent the environmental review of change-in-use proposals in park units statewide. As stated in Section 3.4 of the Draft Program EIR, Objectives of the Process, one of the objectives of the proposed Process is to provide an objective and consistent evaluation tool and process to inform decision-making. This objective and systematic approach for making decisions would allow CSP to provide a more consistent environmental review process for change-in-use proposals throughout all CSP districts in California. This approach should allow for a less cumbersome environmental review process for qualifying change-in-use projects.

This Program EIR may be used to simplify future environmental documents for change-in-use proposals that are not entirely within the scope of this Program EIR. This could help reduce the time and expense associated with environmental review for qualifying change-in-use projects. As noted in CCR Section 15168(c) of the State CEQA Guidelines, subsequent proposed change-in-use projects that are consistent with the Process would be examined in light of the information

in this Program EIR to determine whether an additional environmental document must be prepared. If CSP finds that, pursuant to CCR Section 15162 of the State CEQA Guidelines, no new effects could occur or new mitigation measures would be required on a subsequent project, the activity can be approved as being within the scope of the project covered by this Program EIR, and no new environmental documentation would be required. A Notice of Determination (NOD) would be filed, if CSP determined that a project is within the scope of the Program EIR.

As discussed in Chapter 3, Project Description, of the Draft Program EIR, simplification of future documents could include focusing subsequent EIRs or mitigated negative declarations (MND's) on any new significant effects that were not covered in the Program EIR. In this case, an initial study could be used to identify the new potential significant effects for the subsequent environmental document. Information from the Program EIR may also be incorporated by reference in future environmental documents to describe statewide or regional effects that apply to the Process as a whole, or for cumulative impacts related to a change-in-use proposal that requires its own independent EIR or MND. However, if a change-in-use proposal does not qualify for approval using the Process, it would require its own independent CEQA review and document.

When a new recreational use is added or removed from an existing CSP road or trail, CSP is required to assess whether safety and environmental protection standards and features have been or need to be incorporated into design of the trail. All multi-use trails within the CSP road and trail system have required incorporation of use-appropriate trail design consistent with CSP standards and requirements and the existing framework of statewide and regional legal and regulatory requirements. CSP will assess the potential need for road or trail alterations as part of the proposed Process. In some instances, physical alteration of a road or trail is unnecessary for changes in use. For response to concern related to over-engineering of trails as a result of the proposed Process, please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

Finally, the commenter notes that some existing trails may be functioning in such a way that conversion to a multi-use status would require little or no construction activities. However, many factors contribute to appropriate change-in-use decisions, such as adequate function for all users, illegal use, and trail sustainability. The intent of the change-in-use process is to ensure, to the extent feasible, that the safety of all user groups is met. Also, another intent is to avoid significant environmental effects through the imposition of SPRs, PSRs, and where necessary, mitigation measures. Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

P3-2 Please refer to Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

**Response  
P4**

**Adler, Heidi  
11/27/2012**

P4-1 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

|                        |                                                                                                                                                                               |
|------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Response<br/>P5</b> | <b>Agawa, Tim<br/>11/19/2012</b>                                                                                                                                              |
| P5-1                   | The commenter's support for mountain biking is noted.                                                                                                                         |
| <b>Response<br/>P6</b> | <b>Ahad, Fadi<br/>11/28/2012</b>                                                                                                                                              |
| P6-1                   | The commenter's support for mountain biking is noted.                                                                                                                         |
| <b>Response<br/>P7</b> | <b>Ahmed, Tariq<br/>11/19/2012</b>                                                                                                                                            |
| P7-1                   | Comment expresses appreciation for the trail use conflict study. No CEQA issues are addressed.                                                                                |
| <b>Response<br/>P8</b> | <b>Alberton, Eddie<br/>11/16/2012</b>                                                                                                                                         |
| P8-1                   | See Response to Comment P3-1.                                                                                                                                                 |
| P8-2                   | See Master Response 4, Comments Related to California Public Resources Code 5019.53 and Limits of Development in State Parks That Are Considered "Attractions in Themselves." |
| <b>Response<br/>P9</b> | <b>Allan, Douglas M.<br/>12/03/2012</b>                                                                                                                                       |
| P9-1                   | The comment's opposition to the Process is noted.                                                                                                                             |
| P9-2                   | Potential impacts to biological resources as discussed in Section 4.4, Terrestrial Biological Resources, including impacts to sensitive species.                              |
| P9-3                   | Impact 4.13-1, Increased Demand for Police Protective Services, describes issues related to law enforcement on trails.                                                        |
| P9-4                   | An individual's perception of serenity on a trail is not an environmental issue within the purview of CEQA. The comment's opposition to bicycles on trails is noted.          |

- P9-5 The commenter's opposition to bicycles on trails due to yielding requirements and rate of travel is not an environmental issue within the purview of CEQA. The comment's opposition to bicycles on trails is noted.
- P9-6 Section 15131(a) of the State CEQA Guidelines notes that economic effects of a project are not treated as significant effects on the environment. Therefore, no further response is needed.
- P9-7 See Master Response 2, Comments Related to Safety on Multi-Use Trails.
- P9-8 The commenter's opposition to the Process is noted.

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**Response  
P10**      **Purdy, Allen  
11/20/2012**

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- P10-1 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P11**      **Alstad, Roger  
11/16/2012**

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- P11-1 See Responses to Comments P3-1. The commenter's support for mountain biking is noted.

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**Response  
P12**      **Altevers, Jack  
11/27/2012**

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- P12-1 The commenter's support for mountain biking is noted. The commenter states that change in use could affect revenue. Economic considerations are not environmental issues within the scope of the Program EIR, and no further response can be provided.

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**Response  
P13**      **Alvarado, Sarah  
11/27/2012**

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- P13-1 The commenter's support for mountain biking is noted.

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**Response  
P14**      **Alvarez, Bill  
12/03/2012**

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- P14-1 The commenter's support for the analysis presented in the Program EIR is noted.

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| <b>Response<br/>P15</b> | <b>Alwyn, Jim<br/>11/16/2012</b>                                                                                     |
| P15-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P16</b> | <b>Ammann, Matt<br/>11/16/2012</b>                                                                                   |
| P16-1                   | See Response to Comments P12-1.                                                                                      |
| <b>Response<br/>P17</b> | <b>Anderson, Adam<br/>11/27/2012</b>                                                                                 |
| P17-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P18</b> | <b>Anderson, David<br/>11/27/2012</b>                                                                                |
| P18-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P19</b> | <b>Anderson, Glenn<br/>12/01/2012</b>                                                                                |
| P19-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P20</b> | <b>Anderson, Steve<br/>11/17/2012</b>                                                                                |
| P20-1                   | See Response to Comment P3-1.                                                                                        |
| P20-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

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| <b>Response<br/>P21</b> | <b>Andreini Poulsen, Soni<br/>11/27/2012</b>                                                                                                                                                            |
| P21-1                   | The commenter's support for the analysis presented in the Program EIR is noted.                                                                                                                         |
| <b>Response<br/>P22</b> | <b>Arlledge, Sandy<br/>11/27/2012</b>                                                                                                                                                                   |
| P22-1                   | See Master Response 2, Comments Related to Safety On Multi-Use Trails and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                     |
| <b>Response<br/>P23</b> | <b>Armengol, Esther<br/>11/27/2012</b>                                                                                                                                                                  |
| P23-1                   | See Responses to Comment P3-1 and Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                      |
| <b>Response<br/>P24</b> | <b>Armisen, Fred<br/>11/30/2012</b>                                                                                                                                                                     |
| P24-1                   | The commenter's support for the proposed Process is noted.                                                                                                                                              |
| <b>Response<br/>P25</b> | <b>Ashin, David<br/>11/17/2012</b>                                                                                                                                                                      |
| P25-1                   | See Response to Comments P12-1.                                                                                                                                                                         |
| <b>Response<br/>P26</b> | <b>Auckerman, Nicole and Brian Terkleson<br/>11/28/2012</b>                                                                                                                                             |
| P26-1                   | See Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 4, Comments Related to Limits of Development in State Parks That Are Considered "Attractions In Themselves." |

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| <b>Response<br/>P27</b> | <b>Ayers, Marcel<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P27-1                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Response<br/>P28</b> | <b>Baker, Rob<br/>12/02/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| P28-1                   | See Response to Comment P3-1. The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Response<br/>P29</b> | <b>Balbus, Marcia<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| P29-1                   | This comment generally provides anecdotal evidence used to indicate this individual's opposition to conversion of trails. It is not the intent of the EIR to address past trail reconstruction or the merits and disadvantages of multi-use trails. The impacts of removal and addition of user types from existing trails is discussed in Impact 4.14-1, "Indirect adverse effects to existing, off-site trail facilities." For issues related to "hazards and hassles" of multi-use trails see Master Response 2, Comments Related to Safety on Multi-Use Trails and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| <b>Response<br/>P30</b> | <b>Ball, Dennis<br/>11/20/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P30-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Response<br/>P31</b> | <b>Barbaro, Mike<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P31-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Response<br/>P32</b> | <b>Barker, Jeff<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P32-1                   | The commenter's support for mountain biking is noted. The comment suggests that more bike access should be made available at Folsom Lake SRA and Auburn SRA. It is not the intent of the                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

EIR to consider the use of trails at specific parks. See Master Response 1, Clarification Related to the Purpose and Intent of This Program EIR.

P32-2 Trail use demand issues are addressed in Impact 4.14-2, Impacts from an increase in trail use demand or extension of trail use range. Issues related to trail user etiquette are not environmental impacts. See Master Response 2, Comments Related to Safety on Multi-Use Trails and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

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**Response  
P33**      **Barker, Shannon  
11/17/2012**

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P33-1 The comment implies that the proposed Process would increase the number of trails that would be open to mountain biking uses. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.

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**Response  
P34**      **Bartelt, Matthew  
11/27/2012**

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P34-1 The commenter's support for mountain biking is noted. The commenter states that hikers, equestrians, and bicyclists can peacefully coexist on all trails and that bicyclists should not be banned from parks. The purpose of the EIR is to consider a process for road and trail change-in-use evaluations. See Master Response 1, Clarification Related to the Purpose and Intent of This Program EIR.

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**Response  
P35**      **Bartz, Russell  
12/04/2012**

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P35-1 The commenter's support for multi-use trails is noted.

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**Response  
P36**      **Baty, Jonathan  
11/16/2012**

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P36-1 The commenter's support for mountain biking is noted.

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| <b>Response<br/>P37</b> | <b>Baumann, Al<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                |
| P37-1                   | See Response to comments P38-1.                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Response<br/>P38</b> | <b>Baumann, Al<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                |
| P38-1                   | Comment expresses appreciation for the Program EIR, and suggests the use of non-preclusive language (i.e., so as not to preclude potential types of trail use that may emerge in the future). This comment is noted. Because it does not raise environmental issues, no further response is needed.                                                                                                                                                              |
| <b>Response<br/>P39</b> | <b>Beacock, Craig<br/>11/26/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                             |
| P39-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| P39-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                             |
| <b>Response<br/>P40</b> | <b>Becker, Bob<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                |
| P40-1                   | The commenter's support for mountain biking is noted. The commenter suggests that mountain bikers would have an enhanced experience, if trails were available at night. The purpose of the Program EIR is not to consider changes in hours of operation, but rather the process of road and trail change-in-use evaluation for adding or removing a use. See Master Response 1, Clarification Related to the Purpose and Intent of This Program EIR. Program EIR |
| <b>Response<br/>P41</b> | <b>Becker, Thomas<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                             |
| P41-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                            |

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| <b>Response<br/>P42</b> | <b>Beckman, John<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| P42-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P43</b> | <b>Bell, Becky<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| P43-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P44</b> | <b>Bell, Gary<br/>12/04/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P44-1                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Response<br/>P45</b> | <b>Bell, John<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P45-1                   | The comment implies that the proposed Process would increase the number of trails that would be open to mountain biking uses. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                                                                                                                                                                                                                                                                                                                                                              |
| <b>Response<br/>P46</b> | <b>Benam, Brad<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| P46-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P47</b> | <b>Bender, Craig<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P47-1                   | The commenter's suggestion to consider alternate days for user types is noted. Districts may consider trail use management approaches, such as alternating days for different uses, as a part of the review of a change-in-use proposal, if it is appropriate for the affected road or trail. Although the Program EIR does not define all the potential management approaches a District may employ, they are not precluded by their absence in the document. A change-in-use proposal, including new innovative trail uses, if applicable, will still be considered in light of the |

environmental information presented in the Program EIR. If the proposal qualifies, it may be within the scope of the proposed Process and the Program EIR, and therefore, benefit from not needing to repeat the relevant environmental analysis provided in this document.

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**Response  
P48**      **Bense, Booker  
11/16/2012**

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P48-1      See Response to Comment P3-1.

P48-2      See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response  
P49**      **Benson, Mary  
10/27/2012**

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P49-1      Commenter states that the goal of the Process is to enhance trail use for mountain bikers. This is not accurate. Please see Section 3.1 of the Draft Program EIR, Road and Trail Change-in-Use Evaluation Process Overview.

P49-2      See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR. Baseline user data will be evaluated on trail specific basis, as described in Section 3.6.2 of the Draft Program EIR, Project Checklist – Road and Trail Use Change Survey. Although CSP does not anticipate displacement and disenfranchisement of any groups of people, in accordance with Section 15131 of the State CEQA Guidelines, social issues, such as these, are not considered to be significant effects on the environment. Impact 4.14-1, “Indirect adverse effects to existing, off-site facilities,” discusses the change in existing trail users as a result of removal of addition of a user type.

P49-3      CSP recognizes the growth trends in both demographics and recreational activities and strives to create recreation opportunities that appeal to a wide range of communities. See Response to comment P49-2. Baseline conditions will documented as appropriate.

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**Response  
P50**      **Benson, Mary  
10/27/2012**

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P50-1      Please refer to response to comment O8-3.

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**Response  
P51**      **Berge, Tom  
11/27/2012**

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P51-1      See Response to Comment P3-1.

P51-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response  
P52**      **Berman, Saul  
Unkown**

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P52-1 Comment describes a personal experience related to a multi-use trail. See Master Response 2, Comments Related to Safety on Multi-Use Trails.

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**Response  
P53**      **Berman, Steve  
11/16/2012**

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P53-1 The commenter’s support for mountain biking is noted.

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**Response  
P54**      **Berridge, Peter  
11/16/2012**

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P54-1 See Responses to Comments P3-1.

P54-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response  
P55**      **Berridge, Shayne  
12/4/2012**

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P55-1 See Master Response 2, Comments Related to Safety on Multi-Use Trails.

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**Response  
P56**      **Bettger, Matt  
11/16/2012**

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P56-1 The commenter’s support for mountain biking is noted.

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**Response  
P57**      **Biasotti, Kathryn  
11/29/2012**

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P57-1 The commenter’s support for mountain biking is noted.

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| <b>Response<br/>P58</b> | <b>Bietz, Joshua<br/>11/28/2012</b>                                                                                  |
| P58-1                   | See Response to Comment P3-1.                                                                                        |
| P58-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P59</b> | <b>Biglari, Shawn<br/>11/27/2012</b>                                                                                 |
| P59-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P60</b> | <b>Blackford, Franklin<br/>11/16/2012</b>                                                                            |
| P60-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P61</b> | <b>Blackford, Wm. Chas<br/>Unkown</b>                                                                                |
| P61-1                   | The commenter's support for the analysis presented in the Program EIR is noted.                                      |
| <b>Response<br/>P62</b> | <b>Blaedel, Kenneth<br/>11/27/2012</b>                                                                               |
| P62-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P63</b> | <b>Blanco, Gus<br/>11/29/2012</b>                                                                                    |
| P63-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P64</b> | <b>Boser, Matthew<br/>11/17/2012</b>                                                                                                   |
| P64-1                   | The commenter's support for mountain biking is noted.                                                                                  |
| <b>Response<br/>P65</b> | <b>Boswell, Joanne<br/>10/16/2012</b>                                                                                                  |
| P65-1                   | See Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                 |
| <b>Response<br/>P66</b> | <b>Boulanger, Gary<br/>11/30/2012</b>                                                                                                  |
| P66-1                   | See Response to Comment P3-1.                                                                                                          |
| <b>Response<br/>P67</b> | <b>Bowers, Jeffrey<br/>11/20/2012</b>                                                                                                  |
| P67-1                   | The commenter's support for mountain biking is noted.                                                                                  |
| <b>Response<br/>P68</b> | <b>Bowers, Karl<br/>11/27/2012</b>                                                                                                     |
| P68-1                   | The commenter's support for the analysis presented in the Program EIR and the proposed Process is noted. See Response to Comment P3-1. |
| <b>Response<br/>P69</b> | <b>Boyer, Diana<br/>12/04/2012</b>                                                                                                     |
| P69-1                   | The commenter's support for the analysis presented in the Program EIR is noted.                                                        |

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**Response  
P70**
**Braberg, Hannes  
11/18/2012**


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P70-1 See Response to Comment P3-1.

P70-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P71**
**Brady, Patrick  
11/16/2012**


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P71-1 The commenter's support for mountain biking is noted.

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**Response  
P72**
**Bramlett, Clifford J  
11/18/2012**


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P72-1 See Response to Comment P3-1.

P72-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

P72-3 The commenter's support for mountain biking is noted.

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**Response  
P73**
**Braswell, Troy  
11/16/2012**


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P73-1 The commenter's support for the analysis presented in the Program EIR is noted.

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**Response  
P74**
**Breazeale, Justin  
11/27/2012**


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P74-1 The commenter's support for the proposed Process is noted.

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**Response  
P75**
**Breuninger, Daryl  
12/04/2012**


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P75-1 The commenter's support for the proposed Process is noted.

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| <b>Response<br/>P76</b> | <b>Bronner, Fritz<br/>10/16/2012</b>                                                                                                                                                                                                                                                                      |
| P76-1                   | The commenter's opposition to mountain bikes on public lands is noted. See Master Response 1, Clarification Related to the Purpose and Intent of this Program EIR. Also, please refer to the Draft Program EIR Appendix C, Trail Use Conflict Study, for detailed research regarding trail use conflicts. |
| <b>Response<br/>P77</b> | <b>Brown, Greg<br/>11/20/2012</b>                                                                                                                                                                                                                                                                         |
| P77-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                             |
| P77-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                      |
| <b>Response<br/>P78</b> | <b>Brown, Jeffrey<br/>11/27/2012</b>                                                                                                                                                                                                                                                                      |
| P78-1                   | See Response to Comments P3-1 and Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                        |
| <b>Response<br/>P79</b> | <b>Brown, Justin<br/>11/20/2012</b>                                                                                                                                                                                                                                                                       |
| P79-1                   | Comment suggests opening trails in Humboldt County. This Program EIR is not intended to address specific roads or trails, or specific uses within a particular geographic location. Requests for changes in use should be conveyed to the appropriate District personnel.                                 |
| <b>Response<br/>P80</b> | <b>Brown, Lynn<br/>11/06/2012</b>                                                                                                                                                                                                                                                                         |
| P80-1                   | This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.                                                             |
| P80-2                   | The commenter claims that there is a bias in favor of mountain biking. The proposed Process would address both addition and removal of trail uses, including all types of trail use. Past                                                                                                                 |

petitions are not subject to this Program EIR. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. No specific information related to the environmental analysis was described; therefore, no further response can be provided.

- P80-3 The commenter's opposition to mountain biking is noted. As stated in Section 2.2 of the Draft Program EIR, "CSP proposes to implement the Process to facilitate the review of change-in-use proposal that would add uses to or remove uses from existing recreational roads and trails in the State Park System. This document does not assess whether or not a CSP road or trail should be multi-use." Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. No specific information related to the environmental analysis was described; therefore, no further response can be provided. The comment is noted for consideration during project review. No further response is necessary.
- P80-4 CSP acknowledges that conflicts between users and user groups occur. Section 2.8 of the Draft Program EIR recognizes conflict as one of the "areas of controversy known to CSP" and an issue to be resolved. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and Master Response 2, Comments Related to Safety on Multi-Use Trails. The Program EIR does not ignore the issue of trail use conflict. A detailed Trail Use Conflict Study is provided in Appendix C of the Draft Program EIR. No specific information related to the environmental analysis was described; therefore, no further response can be provided.
- P80-5 Please refer to Master Response 4, Comments Related to California Public Resources Code 5019.53 and Limits of Development in State Parks That Are Considered "Attractions in Themselves." The comment offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate.
- P80-6 Please refer to Response to Comment O8-3. No specific information related to the environmental analysis was described; therefore, no further response can be provided.
- P80-7 Please refer to Response to Comment O1-6 and O5-13. No specific information related to the environmental analysis was described; therefore, no further response can be provided.

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**Response**  
**P81**      **Brown, Sperry**  
**11/17/2012**

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- P81-1 The commenter's support for the analysis presented in the Program EIR is noted.

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**Response**  
**P82**      **Bruce, Ken**  
**11/16/2012**

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- P82-1 The commenter's support for multi-use trails is noted.

| <b>Response<br/>P83</b> | <b>Brusha, Ronald<br/>10/29/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| P83-1                   | <p>Regarding public input and noticing, please refer to response to comment O5-13 and O8-2.</p> <p>Exhibit 3-2 of the Draft Program EIR identifies correct flow of the proposed Process from recommendations by CSP to the evaluation team to preparation of the construction work log. Please refer to p. 3-13 of the Draft Program EIR for a full description of these 2 steps of the Process. Regarding the flowchart's 4<sup>th</sup> step flowing to step five, Exhibit 3-2 of the Draft Program EIR shows the correct progression from step 4 to 5. The commenter is correct in that the public meeting presenter did state that this was an inaccuracy. However, after the meeting, CSP staff discussed the flowchart further and came to the conclusion that the original flowchart presented in the Draft Program EIR is correct.</p> <p>MND is the acronym for Mitigated Negative Declaration. This acronym is shown between step 6 and 7 of the chart in Exhibit 3-2 and discussed in Chapter 3, Project Description, of the Draft Program EIR.</p> <p>As noted in PRC Section 21002.1, the purpose of an EIR is to identify the significant effects on the environment of a project and how those effects can be mitigated or avoided. The Program EIR considers the environmental impacts of implementing the proposed Process on existing CSP roads and trails. Nevertheless, consideration of trail use is important and is a component of the change-in-use process. Please refer to Section 8.1 of the Draft Program EIR and Appendix E, Trail Use Change Survey. Please refer also to Master Response 2, Comments Related to Safety on Multi-Use Trails.</p> |
| P83-2                   | <p>Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. The comment offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate. No further response is required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| P83-3                   | <p>Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. The comment offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate. No further response is required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| P83-4                   | <p>The comment provides no specific information or evidence that the analysis presented in the Program EIR is inadequate, inaccurate, or inappropriate.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Response<br/>P84</b> | <b>Bryant, Joe<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P84-1                   | <p>See Response to Comment P3-1.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

P84-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response  
P85** **Bryant, Richard  
11/27/2012**

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P85-1 The commenter’s support for mountain biking is noted.

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**Response  
P86** **Burda, Mallory  
11/28/2012**

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P86-1 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response  
P87** **Busby, Jim  
11/25/2012**

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P87-1 The commenter’s support for mountain biking is noted.

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**Response  
P88** **Butler, Michael  
11/16/2012**

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P88-1 The commenter’s support for mountain biking is noted.

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**Response  
P89** **Butler, Rosemarie  
11/16/2012**

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P89-1 The commenter’s support for mountain biking is noted.

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**Response  
P90** **Caceres, Frank  
10/27/2012**

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P90-1 See Master Response 2, Comments Related to Safety on Multi-Use Trails; and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.

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| <b>Response<br/>P91</b> | <b>Caceres, Laverne<br/>10/27/2012</b>                                                                                                                                                                                                   |
| P91-1                   | See Master Response 2, Comments Related to Safety on Multi-Use Trails; and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                                                                        |
| <b>Response<br/>P92</b> | <b>Caletti, Cory<br/>11/21/2012</b>                                                                                                                                                                                                      |
| P92-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                    |
| <b>Response<br/>P93</b> | <b>Campi, Curtis<br/>11/28/2012</b>                                                                                                                                                                                                      |
| P93-1                   | The commenter's support for additional trails accessible for mountain biking is noted. No specific information related to the environmental analysis was described; therefore, no further response can be provided.                      |
| <b>Response<br/>P94</b> | <b>Carpenter, Laurie<br/>Unkown</b>                                                                                                                                                                                                      |
| P94-1                   | The commenter's opposition to mountain bikes on state trails is noted. See Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and Master Response 2, Comments Related to Safety on Multi-Use Trails. |
| <b>Response<br/>P95</b> | <b>Cehreli, Ali<br/>11/23/2012</b>                                                                                                                                                                                                       |
| P95-1                   | See Response to Comment P3-1.                                                                                                                                                                                                            |
| P95-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                     |

| <b>Response<br/>P96</b> | <b>Cheltenham, Gene<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| P96-1                   | Trails considered for change in use will be evaluated on a site-specific basis. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| P96-2                   | The commenter's concern for trail widening is noted. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR; and Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P97</b> | <b>Chidester, Damon<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| P97-1                   | The commenter's support for additional trails accessible for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P98</b> | <b>Chilton, Isaac<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| P98-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P99</b> | <b>Christensen, Lori<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P99-1                   | <p>The flow chart addressed in the comment does not reference "additional studies." It notes that if "additional impacts" were identified a trail change-in-use would require preparation of a Mitigated Negative Declaration, provided that each impact could be mitigated. In this case, the project would proceed to the preparation of the Construction Cost Estimate.</p> <p>Regarding the commenter's requested addition to the Trail Use Change Survey questionnaire, to consider the degradation of the character of a trail, the survey is intended to be an objective analytical tool for a trail change-in-use evaluation process whereas the character of a trail is subjective interpretation. A trail's character is likely to mean different things to different individuals and, thus, does not provide meaningful information to determine if a change in use is appropriate. Similarly, characterizing impacts to the recreation experience of current users is also subjective, because perceptions of these impacts can vary.</p> <p>With respect to the recommendation for additional topics in the survey question related to effects to trail use safety; the entire question attempts to assess any potential increase in the likelihood of accidents between users and methods that may be employed to prevent such accidents. Additional topics are not needed.</p> |

Characterizing the environmental impacts associated with installation of speed control devices, railing, brush trimming etc., is not a function of the Trail Use Change Survey, but of the Project Evaluation Form and subsequent CEQA review. Please also refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses, and response to comment O2-7.

P99-2 The Trail Use Change Survey does not have any biases either for or against a specific type of trail change in use; it is a tool used to evaluate the suitability of a trail for multi-use. With respect to comments about trails at Folsom Lake SRA, the Program EIR is a statewide document that has not examined individual trails. Therefore, no further response can be made to this comment. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

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**Response  
P100**      **Christopherson, Mark  
11/27/2012**

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P100-1 See Response to Comment P3-1.

P100-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response  
P101**      **Ciesla, Patty  
Unknown**

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P101-1 The Draft Program EIR was posted to CSP’s website for the entire duration of the public comment period, and afterwards, as well. It was also available during the public review period in paper copy at District offices statewide. It is conceivable that internet access to the website (and document) may have been unavailable at some point during the comment period as a result of website maintenance activities or other internet breakdown. CSP staff confirmed that the link was operating properly when the document was uploaded. Because no other individuals commented about the document’s lack of availability and an extensive number of public comments were received, it appears that this was an isolated incident. No extension or reopening of the public comment period is necessary.

P101-2 Adoption of a General Plan is required by law (Public Resources Code Section 5002.2) before any permanent development or commitment of the unit’s resources can be made. Therefore, implementation of trail change-in-use proposals must be limited to park units with adopted General Plans and the proposal must be consistent with the unit’s General Plan. An adopted Road and Trail Management Plan is not necessary for a District to implement a change-in-use proposal that is consistent with the General Plan; however, where a Road and Trail Management Plan has been adopted, the change-in-use proposal must also be consistent with that plan.

- P101-3 Please refer to Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”
- P101-4 Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.
- P101-5 This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

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**Response  
P102** **Civiello, David**  
**11/20/2012**

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- P102-1 The comment’s expression of support is noted.

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**Response  
P103** **Claassen, Clint**  
**11/16/2012**

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- P103-1 See Response to Comment P3-1.
- P103-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response  
P104** **Clark, Steve**  
**11/30/2012**

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- P104-1 The commenter’s support for the proposed Process is noted.

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**Response  
P105** **Cline, Melissa**  
**12/03/2012**

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- P105-1 The commenter’s support for additional trails accessible for mountain biking is noted.

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| <b>Response<br/>P106</b> | <b>Colburn, Justin<br/>11/28/2012</b>                                                                                |
| P106-1                   | See Response to Comment P3-1.                                                                                        |
| P106-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P107</b> | <b>Coleman, Tom<br/>11/16/2012</b>                                                                                   |
| P107-1                   | The commenter's support for additional trails accessible for mountain biking is noted.                               |
| <b>Response<br/>P108</b> | <b>Coomes, John<br/>11/16/2012</b>                                                                                   |
| P108-1                   | The commenter's support for multi-use trails is noted.                                                               |
| <b>Response<br/>P109</b> | <b>Coonan, Joe<br/>11/28/2012</b>                                                                                    |
| P109-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P110</b> | <b>Corley, Ryan<br/>12/03/2012</b>                                                                                   |
| P110-1                   | See Response to Comment P3-1.                                                                                        |
| P110-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P111</b> | <b>Corral, Tracy<br/>11/30/2012</b>                                                                                  |
| P111-1                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

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| <b>Response<br/>P112</b> | <b>Cortes, Michael<br/>11/27/2012</b>                                                                                |
| P112-1                   | See Response to Comment P79-1.                                                                                       |
| <b>Response<br/>P113</b> | <b>Cortines, Darren<br/>11/28/2012</b>                                                                               |
| P113-1                   | See Response to Comment P79-1.                                                                                       |
| <b>Response<br/>P114</b> | <b>Costello, Christopher<br/>11/17/2012</b>                                                                          |
| P114-1                   | See Response to Comment P3-1.                                                                                        |
| P114-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P115</b> | <b>Courtney, Lans<br/>12/04/2012</b>                                                                                 |
| P115-1                   | See Response to Comment P3-1.                                                                                        |
| P115-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P116</b> | <b>Covello, Candice<br/>11/26/2012</b>                                                                               |
| P116-1                   | Comment expression appreciation for parks. This comment is noted.                                                    |
| P116-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

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| <b>Response<br/>P117</b> | <b>Cramer, Tami<br/>11/28/2012</b>                                                         |
| P117-1                   | See Response to Comment P12-1.                                                             |
| <b>Response<br/>P118</b> | <b>Crawford, Mitchell<br/>11/27/2012</b>                                                   |
| P118-1                   | The commenter's support for mountain biking is noted. Also, see Response to Comment P12-1. |
| <b>Response<br/>P119</b> | <b>Cremona, Christine<br/>11/28/2012</b>                                                   |
| P119-1                   | The commenter's support for the process, multi-use trails and mountain biking is noted.    |
| <b>Response<br/>P120</b> | <b>Crisp, Aidan<br/>11/27/2012</b>                                                         |
| P120-1                   | The commenter's support for mountain biking is noted. Also, see Response to Comment P12-1. |
| <b>Response<br/>P121</b> | <b>Crisp, Gloria<br/>11/27/2012</b>                                                        |
| P121-1                   | The commenter's support for mountain biking is noted. Also, see Response to Comment P12-1. |
| <b>Response<br/>P122</b> | <b>Crisp, Michael<br/>11/27/2012</b>                                                       |
| P122-1                   | The commenter's support for mountain biking is noted.                                      |
| <b>Response<br/>P123</b> | <b>Cronk, Keith<br/>11/30/2012</b>                                                         |
| P123-1                   | See Response to Comment P3-1.                                                              |

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| <b>Response<br/>P124</b> | <b>Crow, Andy<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                                                                |
| P124-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                           |
| <b>Response<br/>P125</b> | <b>Crowley, James<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                                                            |
| P125-1                   | Specific projects are not addressed in the Program EIR. Additionally, Placerita Canyon Nature Reserve is operated by the Los Angeles County Parks Department. Comments regarding trails in this Reserve should be directed to the County. See Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                                            |
| <b>Response<br/>P126</b> | <b>Crowther, Matthew<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                                                         |
| P126-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                           |
| <b>Response<br/>P127</b> | <b>Culligan, Jay<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                             |
| P127-1                   | The commenter's support for additional trails accessible for mountain biking is noted.                                                                                                                                                                                                                                                                                                                          |
| <b>Response<br/>P128</b> | <b>Cumiford, Lola<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                                |
| P128-1                   | <p>Trails considered for change in use will be evaluated on a site-specific basis. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.</p> <p>The commenter's concern for trail widening is noted. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR; and Master Response 2, Comments Related to Safety on Multi-Use Trails.</p> |

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| <b>Response<br/>P129</b> | <b>Cunningham, Richard<br/>11/19/2012</b>                                                                                                                                                                                                                                          |
| P129-1                   | See Response to Comments P3-1.                                                                                                                                                                                                                                                     |
| P129-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                                                               |
| <b>Response<br/>P130</b> | <b>Davis, Grant<br/>11/27/2012</b>                                                                                                                                                                                                                                                 |
| P130-1                   | The commenter’s support for the proposed Process is noted. See Response to Comment P3-1.                                                                                                                                                                                           |
| <b>Response<br/>P131</b> | <b>Davis, Mark<br/>11/18/2012</b>                                                                                                                                                                                                                                                  |
| P131-1                   | The commenter’s support for the proposed Process is noted. See Response to Comment P3-1.                                                                                                                                                                                           |
| P131-2                   | Trails generally are not considered “Attractions in Themselves,” but can become so if they are used in a manner which results in displacement of other users. See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.” |
| <b>Response<br/>P132</b> | <b>De Jong, Jan<br/>11/18/2012</b>                                                                                                                                                                                                                                                 |
| P132-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                      |
| P132-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                                                               |
| <b>Response<br/>P133</b> | <b>De La Riva, Jim<br/>10/18/2012</b>                                                                                                                                                                                                                                              |
| P133-1                   | The commenter’s support for multi-use trails is noted.                                                                                                                                                                                                                             |

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| <b>Response<br/>P134</b> | <b>De Wit, Jessica<br/>11/18/2012</b>                                                                                |
| P134-1                   | The commenter's support for multi-use trails open to mountain biking is noted.                                       |
| <b>Response<br/>P135</b> | <b>Dechaine, Roland<br/>11/28/2012</b>                                                                               |
| P135-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P136</b> | <b>Dee, Ed<br/>11/16/2012</b>                                                                                        |
| P136-1                   | See Response to Comment P3-1.                                                                                        |
| P136-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P137</b> | <b>Denman, Rick<br/>11/16/2012</b>                                                                                   |
| P137-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P138</b> | <b>Dennis, Dusten<br/>11/16/2012</b>                                                                                 |
| P138-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P139</b> | <b>Deponzi, Mark<br/>11/27/2012</b>                                                                                  |
| P139-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P140</b> | <b>Deybrook, Jeanette<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                        |
| P140-1                   | See Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                                                                                                                                                                      |
| <b>Response<br/>P141</b> | <b>Dickey, Jonathan<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                      |
| P141-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                       |
| <b>Response<br/>P142</b> | <b>Ding, Mae Lon<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                                                                                                         |
| P142-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                               |
| P142-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P143</b> | <b>Dinslage, Scott<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                       |
| P143-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                       |
| <b>Response<br/>P144</b> | <b>Dittrich, Doug<br/>11/29/2012</b>                                                                                                                                                                                                                                                                                                                                                                        |
| P144-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Response<br/>P145</b> | <b>Dixon- Johnson, Diane 1<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                               |
| P145-1                   | The Trail Use Change Survey includes an evaluation of a trail for safety issues, as well as user conflicts. Trails that cannot be safely converted to multi-use are not likely to qualify for evaluation through the Process unless reroutes or other trail modifications can be made to the trail to ensure use appropriate design. See Master Response 2, Comments Related to Safety on Multi-Use Trails. |

P145-2 The commenter's opposition to mountain bikers on trails is noted. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.

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**Response  
P146** **Dixon- Johnson, Diane 2  
11/27/2012**

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P146-1 See Response to Letter P145.

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**Response  
P147** **Dixon-Johnson, Diane 3  
10/27/2012**

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P147-1 CSP recognizes that illegal trail use does occur; however, experience has shown that it occurs both in parks with no multi-use trails and in parks that have multi-use trails. Issues related to use of trails by mountain bikers where it is illegal are not within the scope of this Program EIR. See Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses; Master Response 2 Comments Related to Safety on Multi-Use Trails; and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.

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**Response  
P148** **Dixon- Johnson, Diane 3  
10/27/2012**

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P148-1 Environmental impacts associated with the proposed Program are provided in Chapter 4 of the Draft Program EIR. Environmental effects that occur before a change in use are not within the scope of the proposed Process. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.

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**Response  
P149** **Dixon- Johnson, Diane 3  
10/27/2012**

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P149-1 Please refer to response to comment O8-3. No specific information related to the environmental analysis was described; therefore, no further response can be provided.

| <b>Response<br/>P150</b> | <b>Dixon -Johnson, Diane 4<br/>10/27/2012</b>                                                                                                                                                                                                               |
|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| P150-1                   | Issues related to funding are not considered to be environmental impacts. No further response is necessary.                                                                                                                                                 |
| P150-2                   | Preparation of this Program EIR is not funded by IMBA.                                                                                                                                                                                                      |
| P150-3                   | See Master Response 2, Comments Related to Safety on Multi-Use Trails and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                                                                                            |
| P150-4                   | See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR and Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                            |
| <b>Response<br/>P151</b> | <b>Dixon - Johnson, Diane 5<br/>Unkown</b>                                                                                                                                                                                                                  |
| P151-1                   | Submission of exhibits of trail use is noted. The Trail Use Change Survey considers in part whether a trail has enough tread width for safe passage. See Master Response 2 Comments Related to Safety on Multi-Use Trails.                                  |
| <b>Response<br/>P152</b> | <b>Dixon - Johnson, Diane<br/>Unkown</b>                                                                                                                                                                                                                    |
| P152-1                   | The proposed Process is not intended to address specific trails. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                                                                                                 |
| <b>Response<br/>P153</b> | <b>Dixon - Johnson, Diane 7<br/>Unkown</b>                                                                                                                                                                                                                  |
| P153-1                   | See Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses; Master Response 2, Comments Related to Safety on Multi-Use Trails; and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR. |
| P153-2                   | See Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses; and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                                                                    |
| P153-3                   | See Master Response 2, Comments Related to Safety on Multi-Use Trails and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                                                                                            |

P153-4 See Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR. A “mountain bike park,” which is designed for speed and technical skills, is not compatible with the purpose of State Park units, although they may be compatible with a State Vehicular Recreation Park (SVRA). The proposed Process is not applicable to SVRAs. Regardless, this type of facility is outside the scope of this Process and the Program EIR and, therefore, no further response to this comment is required.

P153-5 This comment does not address issues related to the Process or the Program EIR. Therefore, no response is required.

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**Response  
P154**      **Dixon - Johnson, Diane 9  
Unkown**

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P154-1 The submittal of the Trail User Guide is noted. Because no environmental issues were addressed, no further response can be provided.

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**Response  
P155**      **Dixon - Johnson, Diane 10  
Unkown**

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P155-1 The various reports related to mountain biking are noted. Because no environmental issues were addressed, no further response can be provided.

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**Response  
P156**      **Dixon - Johnson 12  
Unkown**

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P156-1 The submittal of the Trail User Guide is noted. Because no environmental issues were addressed, no further response can be provided.

P156-2 The Process is proposed by CSP as described in Chapter 1 of the Draft Program EIR, Introduction.

P156-3 The comment is unclear and does not address the adequacy or accuracy of the Draft Program EIR. No further response can be provided.

P156-4 Off-highway motor vehicle recreation (OHMVR) uses are not covered under the Process. No reason is given as to how OHMVR uses would apply to the proposal or environmental analysis, therefore, no further response is required.

P156-5 The Draft Program EIR contains the details related to the proposal.

P156-6 Chapter 4 of the Draft Program EIR provides the environmental analysis of the proposed Process, including a discussion of potential impacts to geology and archeology.

- P156-7 This comment does not address issues related to the Process or the Program EIR. Therefore, no response is required.
- P156-8 This comment does not provide enough detail to allow for a response and does not appear to address issues related to the Process or the Program EIR.
- P156-9 This comment does not provide enough detail to allow for a response and does not appear to address issues related to the Process or the Program EIR.
- P156-10 This comment does not provide enough detail to allow for a response and does not appear to address issues related to the Process or the Program EIR.
- P156-11 This comment does not provide enough detail to allow for a response and does not appear to address issues related to the Process or the Program EIR.
- P156-12 This comment does not provide enough detail to allow for a response and does not appear to address issues related to the Process or the Program EIR.
- P156-13 This comment does not provide enough detail to allow for a response and does not appear to address issues related to the Process or the Program EIR.
- P156-14 This comment does not provide enough detail to allow for a response and does not appear to address issues related to the Process or the Program EIR. Trail use conflicts are discussion in Chapter 8 of the Draft Program EIR.
- P156-15 This comment does not provide enough detail to allow for a response and does not appear to address issues related to the Process or the Program EIR.
- P156-16 This comment does not provide enough detail to allow for a response and does not appear to address issues related to the Process or the Program EIR.
- P156-17 Chapter 4 of the Draft Program EIR details the environmental setting, environmental impacts, and the proposed mitigation measures associated with the proposed Process.
- P156-18 The proposed Process would be applicable to both the removal and addition of different user types to existing trails. The preparation of the Process and Program EIR was not funded by IMBA.
- P156-19 This document addresses parks in the NPS system. Trails in the National Park system are not applicable to the Process or Program EIR.
- P156-20 The commenter does not provide a reference for an apparent quote. Chapter 4 of the Draft Program EIR discusses the environmental effects associated with the proposed Process.
- P156-21 OHMVR is not within the scope of the proposed Process or Program EIR.
- P156-21 The submittal of the Trail User Guide is noted. Because no environmental issues were addressed, no further response can be provided.
- P156-22 This comment does not address issues related to the Process or the Program EIR.

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|---------|----------------------------------------------------------------------------------------------------------------------------|
| P156-23 | This comment does not address issues related to the Process or the Program EIR.                                            |
| P156-24 | This comment does not address issues related to the Process or the Program EIR.                                            |
| P156-25 | This comment does not address issues related to the Process or the Program EIR.                                            |
| P156-26 | This comment does not address issues related to the Process or the Program EIR.                                            |
| P156-27 | The series of reports submitted are noted. This comment does not address issues related to the Process or the Program EIR. |

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**Response  
P157**      **Dixon - Johnson, Diane 13  
Unkown**

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| P157-1 | The Commenter's concern for multi-use trails is noted. See Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses; Master Response 2, Comments Related to Safety on Multi-Use Trails; and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR. |
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**Response  
P158**      **Do Couto, Michael  
11/26/2012**

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| P158-1 | See Response to Comment P3-1.                                                                                        |
| P158-2 | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

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**Response  
P159**      **Dobson, Joe  
11/23/2012**

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| P159-1 | The commenter's support for mountain biking is noted. |
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**Response  
P160**      **Dochtermann, Mark  
11/27/2012**

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| P160-1 | The commenter's support for mountain biking is noted. |
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| <b>Response<br/>P161</b> | <b>Doebel, Linda<br/>Unkown</b>                                                                                                                                                                                                                                                               |
| P161-1                   | See Master Response 2, Comments Related to Safety on Multi-Use Trails and Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR. No specific information related to the environmental analysis was described; therefore, no further response can be provided. |
| <b>Response<br/>P162</b> | <b>Doherty, Keven<br/>11/27/2012</b>                                                                                                                                                                                                                                                          |
| P162-1                   | See Response to Comment P12-1.                                                                                                                                                                                                                                                                |
| <b>Response<br/>P163</b> | <b>Doi, Cliff<br/>11/28/2012</b>                                                                                                                                                                                                                                                              |
| P163-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                         |
| <b>Response<br/>P164</b> | <b>Dommen, Kristi<br/>12/03/2012</b>                                                                                                                                                                                                                                                          |
| P164-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P165</b> | <b>Donner, Aaron<br/>11/27/2012</b>                                                                                                                                                                                                                                                           |
| P165-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                 |
| P165-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                          |
| <b>Response<br/>P166</b> | <b>Dorman, Brandon<br/>11/16/2012</b>                                                                                                                                                                                                                                                         |
| P166-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                         |

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| <b>Response<br/>P167</b> | <b>Doucet, Keven<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P167-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Response<br/>P168</b> | <b>Drennon, Tim<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| P168-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P169</b> | <b>Drnec, Joseph<br/>11/29/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P169-1                   | Commenter states, "Yes." Because no details were related to this comment are provided, no response can be provided.                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Response<br/>P170</b> | <b>Dubin, Linda<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| P170-1                   | Comment expresses opposition to opening trails in Topanga Canyon State Park. This Program EIR is not intended to address specific roads or trails, or specific uses within a particular geographic location. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. No specific information related to the environmental analysis was described; therefore, no further response can be provided. |
| <b>Response<br/>P171</b> | <b>Dugger, Joy<br/>11/30/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| P171-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Response<br/>P172</b> | <b>Dye, Roger<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P172-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| <b>Response<br/>P173</b> | <b>Early, John<br/>11/27/2012</b>                                                                                                              |
| P173-1                   | The commenter's support for mountain biking is noted. The commenter's support for the analysis presented in the Program EIR is noted.          |
| <b>Response<br/>P174</b> | <b>Eckert, Geoff<br/>11/16/2012</b>                                                                                                            |
| P174-1                   | The commenter's support for mountain biking is noted.                                                                                          |
| <b>Response<br/>P175</b> | <b>Edelman, Ron<br/>12/04/2012</b>                                                                                                             |
| P175-1                   | See Response to Comment P3-1.                                                                                                                  |
| P175-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                           |
| <b>Response<br/>P176</b> | <b>Edgin, Chuck<br/>11/28/2012</b>                                                                                                             |
| P176-1                   | The commenter's support for the proposed Process is noted. The comment that volunteers may be available to modify or maintain trails is noted. |
| <b>Response<br/>P177</b> | <b>Edney, Steven<br/>11/16/2012</b>                                                                                                            |
| P177-1                   | Comment states that Arizona and Utah state parks allow trail riders. This comment does not address the proposed Process or Program EIR.        |
| <b>Response<br/>P178</b> | <b>Eggers, Matt<br/>11/16/2012</b>                                                                                                             |
| P178-1                   | See Response to Comment P3-1.                                                                                                                  |

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| <b>Response<br/>P179</b> | <b>Ehrmann-Hanlon, Regina<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| P179-1                   | Comment expresses opposition to expanding multi-use trails in Folsom Lake State Recreation Area. This Program EIR is not intended to address specific roads or trails, or specific uses within a particular geographic location. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. No specific information related to the environmental analysis was described; therefore, no further response can be provided. |
| <b>Response<br/>P180</b> | <b>Elias, Carlos<br/>12/01/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| P180-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P181</b> | <b>Endicott, Katy<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P181-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P182</b> | <b>Entera, Mike<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| P182-1                   | See Response to Comment P79-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P183</b> | <b>Esbensen, Ronna<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| P183-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. The comment provides no specific information or evidence that the analysis presented in the Program EIR is inadequate, inaccurate, or inappropriate.                                                                                                                                                                                                          |

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| <b>Response<br/>P184</b> | <b>Estes, Bob<br/>12/04/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| P184-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P184-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P185</b> | <b>Ettinger, Jesse<br/>11/30/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P185-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P185-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P186</b> | <b>Everett, Eileen<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P186-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Response<br/>P187</b> | <b>Farinella, Georgia and Chris<br/>10/24/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| P187-1                   | This Program EIR is not intended to address specific roads or trails, or specific uses within a particular geographic location. Furthermore, the Process does not change all trails to multi-use but provides an objective process for evaluating trails individually. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary. |
| <b>Response<br/>P188</b> | <b>Farrer, Cory<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| P188-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| <b>Response<br/>P189</b> | <b>Feher, Desmond<br/>11/21/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| P189-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| P189-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Response<br/>P190</b> | <b>Fenton, Drew<br/>Unknown</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P190-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P190-2                   | <p>General Plans are intended to establish broad policies and implementation actions for the management, development, and operation of park units. They do not typically provide the necessary detail to address a specific road or trail change-in-use proposal. In fact, some General Plans recommend preparation of a more detailed, Road and Trail Management Plan following the completion of a General Plan to clarify issues of trail access, use, and management.</p> <p>The proposed process simply creates a uniform, consistent, and objective evaluation process to determine if proposed road and trail changes in use are suitable for implementation. Its scope is statewide and it is not directed to or favorable to any particular park units. The proposed Process is just one of many internal tools CSP uses to implement policies and effectively manage activities and programs within its park units. The Process is consistent with Policy Notice No. 2005-06, which establishes as policy to consider multi-use trails in the development of trail plans or individual trails.</p> |
| P190-3                   | The Process evaluated in the Program EIR would be the tool used by each park unit when a request has been made to change the use of a road or trail. One of the purposes of a Program EIR (CEQA Section 15168(b)(3)) is to avoid duplicative reconsideration of basic policy considerations. Upon certification of the Program EIR, personnel from each district would be trained on its implementation and no further CEQA review or public comments will be required for Districts to begin to use the Process. Additional public input would be sought by the Districts consistent with the Process and the project's CEQA requirements (see the flow chart in Exhibit 3-2 of the Draft Program EIR). This Program EIR has been prepared in accordance with the CEQA Guidelines (Section 15168) and applies to all CSP units, except SVRAs. For a description of public input opportunities, please refer to response to comment O1-6 and O5-13. No specific information related to the environmental analysis was described; therefore, no further response can be provided.                             |
| P190-4                   | The Program EIR provides the project location in Section 3.2 of the Draft Program EIR, Geographic Extent of the Process. As described in Section 1.2 of the Draft Program EIR, Use of a Program Environmental Impact Report:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

... Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways ... subsequent proposed activities that are consistent with the Process (i.e., proposed change-in-use projects within units of the State Park System) would be examined in light of the information in this Program EIR to determine whether an additional environmental document must be prepared.

The Process and the Draft Program EIR meet the criteria of a Program EIR, as required under the CEQA Guidelines. The steps of the proposed Process are described in Section 3.6 of the Draft Program EIR, "Project Requirements and Change-in-Use Evaluation Process."

- P190-5 There are no commercial interests associated with this project. All correspondence received by CSP related to the process is included in this Final Program EIR document. No specific information related to the environmental analysis was described; therefore, no further response can be provided.
- P190-6 Please refer to response to comment O2-17.
- P190-7 Preparation of this environmental analysis was funded by CSP. No specific information related to the environmental analysis was described; therefore, no further response can be provided.
- P190-8 Please refer to response P190-3 above. Additionally, please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.
- P190-9 No specific information related to issues of security concerns and how implementation of the proposed Process will exacerbate theft or permit "logging projects" without permits. Therefore, no further response can be provided.
- P190-10 This comment suggests issues that would not occur under the proposed Process, because environmental safeguards are included in all phases of its implementation. It does not raise concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.
- P190-11 Public Resources Code Section 21082.1(a) states any environmental impact report shall be prepared directly by, or under contract to, a public agency. Ascent Environmental, Inc. prepared the Program EIR under contract to CSP, which is the lead agency. CSP as the lead agency fulfilled the responsibilities noted in Section 21082.1(c) including independently reviewing and analyzing all reports and circulated only drafts that reflect CSP's independent judgment. No specific information related to the environmental analysis was described; therefore, no further response can be provided.
- P190-12 Ascent Environmental, Inc. is a privately owned, California corporation, based in Sacramento. No specific information related to the environmental analysis was described; therefore, no further response can be provided.

- P190-13 This Program EIR is not intended to address specific roads or trails that could be affected. It provides an objective process for evaluating trails individually. Therefore, it not feasible to estimate the number of Coast Redwoods that could be removed, if any, until a specific change-in-use request is received and the trail can be properly evaluated in accordance with the Process. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. Please also refer to Section 4.4, Terrestrial Biological Resources, for SPRs and analysis related to tree removal.
- P190-14 No specific information related to the environmental analysis was described; therefore, no further response can be provided.
- P190-15 No specific information related to the environmental analysis was described; therefore, no further response can be provided.

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**Response  
P191**      **Ferre, Jean-Luc  
11/16/2012**

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- P191-1 See Response to Comment P3-1.
- P191-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response  
P192**      **Finch, David M.  
11/25/2012**

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- P192-1 The commenter’s concerns regarding multi-use trails in CSP units are noted. As discussed in Chapter 3, Project Description, of the Draft Program EIR, multi-use trails have long been the established policy for trail planning in California due to reduced construction and maintenance costs as well as reduced resource impacts, compared to provision of separate trails for each user group. The existence of mountain bikes on trails is not subject to debate in the Program EIR; see Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.
- P192-2 Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses, Master Response 2, Comments Related to Safety On Multi-Use Trails, and Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.
- P192-3 The Trail Use Change Survey considers in part whether a trail has enough tread width for safe passage or if there is area to retreat to the downhill side of the trail. The commenter’s concerns regarding fear and anxiety as a result of potential for collision on multi-use trails are noted. As discussed in Chapter 1 of the Trail Use Conflict Study (see Appendix C of the Draft Program EIR), the literature review and agency survey results found that accidents are rare compared to the number of incidents, and actual incidents tend to be rare in relation to extent of comments and complaints about conflict between trail user types. Please also refer to Chapter 8, Master Response 2, Comments Related to Safety On Multi-Use Trails, and Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.

P192-4 Commenter relates reduced safety issues to reduced accessibility. The recreation effects of removal and addition of user type(s) to a trail facility are discussed in Impact 4.14-1, "Indirect adverse effects to existing, off-site trail facilities." See Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

P192-5 Trails, bridges and other similar trail features inherently alter natural topography and vegetation through the environment which a trail traverses. Placement of speed control devices will be constructed of natural materials and thus no different than other such trail features. Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

P192-6 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.

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**Response  
P193**      **Finch, John  
12/02/2012**

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P193-1 The commenter's support for mountain biking is noted.

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**Response  
P194**      **Findlay, Doug  
11/29/2012**

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P194-1 See Response to Comment P3-1.

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**Response  
P195**      **Finn, Paul  
11/17/2012**

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P195-1 The commenter's support for mountain biking is noted.

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**Response  
P196**      **Fish, Ben  
12/04/2012**

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P196-1 The commenter's support for mountain biking is noted.

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**Response  
P197**      **Fish, Rich  
11/20/2012**

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P197-1 The commenter's support for mountain biking is noted.

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| <b>Response<br/>P198</b> | <b>Fisher, John<br/>11/16/2012</b>                                                                                   |
| P198-1                   | See Response to Comment P3-1.                                                                                        |
| P198-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P199</b> | <b>Fitzsimmons, Mark<br/>11/25/2012</b>                                                                              |
| P199-1                   | See Response to Comment P3-1.                                                                                        |
| P199-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P200</b> | <b>Fitzwater, Todd<br/>11/16/2012</b>                                                                                |
| P200-1                   | The commenter's support for the analysis presented in the Program EIR is noted.                                      |
| <b>Response<br/>P201</b> | <b>Floren, Joseph<br/>11/19/2012</b>                                                                                 |
| P201-1                   | See Response to Comment P3-1.                                                                                        |
| P201-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P202</b> | <b>Fogarty, Mark<br/>11/28/2012</b>                                                                                  |
| P202-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P203</b> | <b>Fong, David<br/>11/28/2012</b>                                                         |
| P203-1                   | The commenter's support for mountain biking is noted.                                     |
| <b>Response<br/>P204</b> | <b>Foote, Thomas<br/>11/16/2012</b>                                                       |
| P204-1                   | The commenter's support for mountain biking is noted. See also Response to Comment P79-1. |
| <b>Response<br/>P205</b> | <b>Frates, Billy<br/>12/01/2012</b>                                                       |
| P205-1                   | The commenter's support for mountain biking is noted.                                     |
| <b>Response<br/>P206</b> | <b>Fraychineaud, Derek<br/>11/27/2012</b>                                                 |
| P206-1                   | The commenter's support for mountain biking is noted.                                     |
| <b>Response<br/>P207</b> | <b>Fregoso, Israel<br/>11/27/2012</b>                                                     |
| P207-1                   | See Response to Comment P3-1.                                                             |
| P207-2                   | See Response to Comment P79-1.                                                            |
| <b>Response<br/>P208</b> | <b>Freitag, Brad<br/>11/16/2012</b>                                                       |
| P208-1                   | The commenter's support for mountain biking is noted.                                     |

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| <b>Response<br/>P209</b> | <b>Frieden, Kurt<br/>12/01/2012</b>                                                                                                                                                                                                                                     |
| P209-1                   | This comment provides examples of multi-use trails. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                                                                                                                          |
| <b>Response<br/>P210</b> | <b>Fuchs, John<br/>12/03/2012</b>                                                                                                                                                                                                                                       |
| P210-1                   | The commenter's support for the analysis presented in the Program EIR is noted.                                                                                                                                                                                         |
| <b>Response<br/>P211</b> | <b>Fuentes, Miguel<br/>11/27/2012</b>                                                                                                                                                                                                                                   |
| P211-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                   |
| <b>Response<br/>P212</b> | <b>Fullerton, Linda<br/>10/27/2012</b>                                                                                                                                                                                                                                  |
| P212-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| <b>Response<br/>P213</b> | <b>Gaffney, Kevin<br/>11/27/2012</b>                                                                                                                                                                                                                                    |
| P213-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                   |
| <b>Response<br/>P214</b> | <b>Gaffney, Maureen<br/>12/03/2012</b>                                                                                                                                                                                                                                  |
| P214-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                           |
| P214-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                    |

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| <b>Response<br/>P215</b> | <b>Gans, Hilary<br/>11/17/2012</b>                         |
| P215-1                   | The commenter's support for the proposed Process is noted. |
| <b>Response<br/>P216</b> | <b>Garcia, Aaron<br/>11/19/2012</b>                        |
| P216-1                   | The commenter's support for mountain biking is noted.      |
| <b>Response<br/>P217</b> | <b>Garcia, Aaron<br/>11/28/2012</b>                        |
| P217-1                   | The commenter's support for mountain biking is noted.      |
| <b>Response<br/>P218</b> | <b>Garcia, Joseph<br/>11/29/2012</b>                       |
| P218-1                   | The commenter's support for mountain biking is noted.      |
| <b>Response<br/>P219</b> | <b>Garcia-Diaz, Kristabel<br/>11/21/2012</b>               |
| P219-1                   | The commenter's support for mountain biking is noted.      |
| <b>Response<br/>P220</b> | <b>Gaskins, Mike<br/>11/27/2012</b>                        |
| P220-1                   | The commenter's support for mountain biking is noted.      |

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| <b>Response<br/>P221</b> | <b>Gates, Valerie<br/>10/26/2012</b>                                                                                                                                                                                                                                                                                                                                                                                        |
| P221-1                   | Not all trails in the CSP park system are suitable for multi-use and, therefore, mountain biking would not be allowed on all trails. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary. |
| <b>Response<br/>P222</b> | <b>Geahry, Darrin<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                                                                        |
| P222-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Response<br/>P223</b> | <b>George, Dave<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                                                                                                                          |
| P223-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Response<br/>P224</b> | <b>George, Drew<br/>12/04/2012</b>                                                                                                                                                                                                                                                                                                                                                                                          |
| P224-1                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Response<br/>P225</b> | <b>George, Linda and David<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                               |
| P225-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                               |

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| Response<br>P226 | Gerson, Ruth<br>10/15/2012                                                                                                                                                                                                                                                                                                                                                                                                       |
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| P226-1           | Not all trails in the CSP park system are suitable for multi-use and, therefore, certain trails would remain limited to hiking. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                          |
| P226-2           | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses, and Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                         |
| P226-3           | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                                                                                                                                                                                                                                                                                           |
| P226-4           | No specific information related to the environmental analysis was described; therefore, no further response can be provided.                                                                                                                                                                                                                                                                                                     |
| P226-5           | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR and response to comment O8-3. This Program EIR is not intended to address specific roads or trails in any particular geographic location including projects that were previously constructed. No specific information related to the environmental analysis was described; therefore, no further response can be provided. |
| P226-6           | Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses, and Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                   |
| P226-7           | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. No specific change-in-use proposal would be authorized with the certification of the Program EIR and approval of the proposed Process by CSP. Districts must consider each specific change-in-use proposal at an individual State Park unit as its own project under CEQA.                                                |
| P226-8           | The letters provided offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate. The comment is noted for consideration during project review. No further response is necessary.                                                                                                                                                                                              |
| P226-9           | The comment provided offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate. No further response is necessary.                                                                                                                                                                                                                                                            |
| P226-10          | The <i>Criteria for Multi-Use Trails to Ensure Safety and a Quality Experience for All</i> , by the California Equestrian Trail & Lands Coalition is noted. The comment provided offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate. No further response is necessary.                                                                                                |

- P226-11 The comment provided offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate. No further response is necessary.
- P226-11 The comment provided offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate. No further response is necessary.
- P226-12 The comment provided offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate and appears to relate to issues at Tapia Spur Trail several years ago. No further response is necessary.

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**Response  
P227**      **Gerson, Ruth  
12/04/2012**

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- P227-1 The public circulation period of the Draft Program EIR began with the filing of the document, Notice of Availability, and Notice of Completion with the State Clearinghouse, Governor's Office of Planning and Research. CEQA and the State CEQA Guidelines require a minimum of 45 days for public review of a draft EIR. The public circulation period of the Draft Program EIR exceeded this minimum period. CSP apologizes for any delay in the receipt of direct notices.

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**Response  
P228**      **Gibson, Ryan  
11/16/2012**

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- P228-1 The commenter's support for additional multi-use trails open to mountain biking is noted.

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**Response  
P229**      **Glaza, Lorenz  
11/17/2012**

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- P229-1 See Response to Comment P3-1.
- P229-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P230**      **Goldeen, Marian  
12/03/2012**

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- P230-1 See Response to Comment P3-1.
- P230-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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| <b>Response<br/>P231</b> | <b>Gonzalez, Bob<br/>11/17/2012</b>                                                                                  |
| P231-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P232</b> | <b>Gonzalez, Jose<br/>11/28/2012</b>                                                                                 |
| P232-1                   | See Response to Comment P3-1.                                                                                        |
| P232-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P233</b> | <b>Goodman, Michael<br/>11/27/2012</b>                                                                               |
| P233-1                   | See Response to Comment P3-1.                                                                                        |
| P233-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P234</b> | <b>Gordon, Sean<br/>11/16/2012</b>                                                                                   |
| P234-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P235</b> | <b>Goss, Paul<br/>11/30/2012</b>                                                                                     |
| P235-1                   | See Response to Comment P3-1.                                                                                        |
| P235-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

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| <b>Response<br/>P236</b> | <b>Gould, Chris<br/>12/03/2012</b>                                                                                                                                       |
| P236-1                   | The commenter's support for the proposed Process is noted.                                                                                                               |
| <b>Response<br/>P237</b> | <b>Govers, Oliver<br/>11/28/2012</b>                                                                                                                                     |
| P237-1                   | See Response to Comment P3-1.                                                                                                                                            |
| <b>Response<br/>P238</b> | <b>Grabow, Eric<br/>11/16/2012</b>                                                                                                                                       |
| P238-1                   | See Response to Comment P3-1.                                                                                                                                            |
| <b>Response<br/>P239</b> | <b>Grady, Gardner<br/>12/03/2012</b>                                                                                                                                     |
| P239-1                   | The commenter's support for mountain biking is noted. Also see Master Response 3, Comments Related to under-Engineering or Over-Engineering of Trails under the Process. |
| <b>Response<br/>P240</b> | <b>Graham, Ryan<br/>12/03/2012</b>                                                                                                                                       |
| P240-1                   | The commenter's support for mountain biking is noted. The commenter's support for the proposed Process is noted.                                                         |
| <b>Response<br/>P241</b> | <b>Granata, Lisa<br/>11/30/2012</b>                                                                                                                                      |
| P241-1                   | See Response to Comment P3-1.                                                                                                                                            |
| P241-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                     |

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| <b>Response<br/>P242</b> | <b>Grant, Laird<br/>11/27/2012</b>                                                                                   |
| P242-1                   | The commenter's support for the proposed Process is noted.                                                           |
| <b>Response<br/>P243</b> | <b>Gray, Rebecca<br/>12/03/2012</b>                                                                                  |
| P243-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P244</b> | <b>Greenwald, Raymond<br/>12/03/2012</b>                                                                             |
| P244-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P245</b> | <b>Gregg, Joan<br/>11/18/2012</b>                                                                                    |
| P245-1                   | See Response to Comment P3-1.                                                                                        |
| P245-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P246</b> | <b>Greve, Fritz<br/>11/16/2012</b>                                                                                   |
| P246-1                   | See Response to Comment P3-1.                                                                                        |
| P246-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P247</b> | <b>Greve, Fritz<br/>11/27/2012</b>                                                                                   |
| P247-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P248</b> | <b>Groenhof, John<br/>12/07/2012</b>                                                                                 |
| P248-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P249</b> | <b>Grundler, Grant<br/>11/16/2012</b>                                                                                |
| P249-1                   | The commenter's support for mountain biking is noted. See Response to Comment P45-1.                                 |
| <b>Response<br/>P250</b> | <b>Grundler, Ralph<br/>11/27/2012</b>                                                                                |
| P250-1                   | See Response to Comment P3-1.                                                                                        |
| P250-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P251</b> | <b>Gruver, Bruce<br/>11/30/2012</b>                                                                                  |
| P251-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P252</b> | <b>Guardado, Joe<br/>11/27/2012</b>                                                                                  |
| P252-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P253</b> | <b>Guillaudeu, Scott and Sarah<br/>12/03/2012</b>                                                                    |
| P253-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P254</b> | <b>Guney, Ergin<br/>11/23/2012</b>                    |
| P254-1                   | The commenter's support for mountain biking is noted. |
| <b>Response<br/>P255</b> | <b>Gutierrez, Jesse<br/>12/01/2012</b>                |
| P255-1                   | The commenter's support for mountain biking is noted. |
| <b>Response<br/>P256</b> | <b>Gyorey, Paul<br/>11/30/2012</b>                    |
| P256-1                   | The commenter's support for mountain biking is noted. |
| <b>Response<br/>P257</b> | <b>Haagen-Smit, Cathy<br/>12/03/2012</b>              |
| P257-1                   | The commenter's support for mountain biking is noted. |
| <b>Response<br/>P258</b> | <b>Haaker, John<br/>11/17/2012</b>                    |
| P258-1                   | The commenter's support for mountain biking is noted. |
| <b>Response<br/>P259</b> | <b>Haddock, Gerald<br/>11/16/2012</b>                 |
| P259-1                   | The commenter's support for mountain biking is noted. |

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| <b>Response<br/>P260</b> | <b>Haggstrom, Shirley<br/>Unkown</b>                                                                                                                                                                                                                                    |
| P260-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| <b>Response<br/>P261</b> | <b>Hall, Richard<br/>11/27/2012</b>                                                                                                                                                                                                                                     |
| P261-1                   | See Response to Comment P33-1.                                                                                                                                                                                                                                          |
| <b>Response<br/>P262</b> | <b>Ham, Mallory<br/>12/03/2012</b>                                                                                                                                                                                                                                      |
| P262-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                   |
| <b>Response<br/>P263</b> | <b>Hamburgen, Anders<br/>11/17/2012</b>                                                                                                                                                                                                                                 |
| P263-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                   |
| <b>Response<br/>P264</b> | <b>Hangen, William and Terra<br/>10/17/2012</b>                                                                                                                                                                                                                         |
| P264-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                                                                                                                                  |
| <b>Response<br/>P265</b> | <b>Hanlon, Stephen<br/>11/16/2012</b>                                                                                                                                                                                                                                   |
| P265-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                           |

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| <b>Response<br/>P266</b> | <b>Hannum, Patrick<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| P266-1                   | Commenter states support for the International Mountain Biking Association (IMBA). No response is necessary.                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Response<br/>P267</b> | <b>Hannum, Patrick<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P267-1                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Response<br/>P268</b> | <b>Hans, Gerry and Mary Button<br/>11/19/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P268-1                   | The purpose of the Program EIR is to consider the environmental impacts resulting from implementing the Process. The Trail Use Change Survey, which is used in assessing individual trails for a potential change in use, is more appropriately the tool used by CSP to consider a trail's existing users. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and Master Response 2, Comments Related to Safety on Multi-Use Trails.                               |
| P268-2                   | The California Recreational Trails Act, described in Section 3.3.1 of the Draft Program EIR, describes CSP's policy of encouraging hiking, horseback riding, and bicycling, noting their importance to the health and welfare of the state's population. Therefore, it is appropriate that the Program EIR considers mountain biking a legitimate use on certain CSP trails. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                    |
| P268-3                   | Please refer to response to comment O1-6 and O5-13.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| P268-4                   | The comment provides no specific information as to how Exhibit 3-2 is illogical, nor does it provide recommendations on ways to improve this exhibit. Therefore, no further response can be provided.                                                                                                                                                                                                                                                                                                                  |
| P268-5                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                                                                                                                                                                          |
| P268-6                   | As stated on page 3-13, the term, "multi-use trail," is used to describe an "unpaved pathway or trails for use by all three primary types of trail users: pedestrians/hikers, equestrians, and bicycle riders." The use of this term is not subject to debate in this Program EIR. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. No specific information related to the environmental analysis was described; therefore, no further response can be provided. |

No specific court cases were cited with respect to “traditional usage rights” so no response to this comment can be provided.

P268-7 The Program EIR has not considered using “concrete bricking” as a remedy to prevent erosion. As part of the evaluation of a trail for a change in use, the existing sustainability of a trail is evaluated and the future sustainability is considered were the trail converted to multi-use. CSP does not typically utilize such methods as waterbars to control erosion. Please refer to response to comment A6-3 and O2-24.

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**Response**  
**P269**      **Hansen, Erik**  
**12/09/2012**

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P269-1 The commenter’s support for mountain biking is noted.

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**Response**  
**P270**      **Hansen, James**  
**11/16/2012**

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P270-1 The commenter’s support for mountain biking is noted. See Response to Comment P45-1.

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**Response**  
**P271**      **Hansen, Linda**  
**11/19/2012**

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P271-1 The commenter’s support for mountain biking is noted.

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**Response**  
**P272**      **Harrington, Jane**  
**10/27/2012**

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P272-1 Specific projects are not addressed in the Program EIR. Additionally, Griffith Park is owned and operated by the City of Los Angeles Department of Parks and Recreation. The Program EIR applies only to park units owned and operated by the California Department of Parks and Recreation. Comments regarding mountain bikes on trails in this park should be directed to that agency. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and Master Response 2, Comments Related to Safety on Multi-Use Trails. No specific information related to the environmental analysis was described; therefore, no further response can be provided.

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| <b>Response<br/>P273</b> | <b>Harrington, Jane<br/>11/03/2012</b>                                                                               |
| P273-1                   | Please refer to Response to comment P272-1 above.                                                                    |
| <b>Response<br/>P274</b> | <b>Harrington, Tim<br/>11/28/2012</b>                                                                                |
| P274-1                   | The commenter's support for mountain biking is noted. See Response to Comment P45-1.                                 |
| <b>Response<br/>P275</b> | <b>Harris, Jeff<br/>11/29/2012</b>                                                                                   |
| P275-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P276</b> | <b>Harris, Kevin<br/>11/18/2012</b>                                                                                  |
| P276-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P277</b> | <b>Harris, Nancy<br/>11/28/2012</b>                                                                                  |
| P277-1                   | See Response to Comment P3-1.                                                                                        |
| P277-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P278</b> | <b>Harris, Ryan<br/>11/16/2012</b>                                                                                   |
| P278-1                   | See Response to Comment P3-1.                                                                                        |
| P278-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

| <b>Response<br/>P279</b> | <b>Harrison, David<br/>12/01/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| P279-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Response<br/>P280</b> | <b>Hartlaub, Michael<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P280-1                   | See Response to Comment P79-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Response<br/>P281</b> | <b>Hasenauer, Jim<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| P281-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. Regarding backlog, please refer to O4-3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P281-2                   | Section 4-14 (i.e., Section 4.14) referenced in the comment is the Recreation Section of the Program EIR. The comment suggests that the section compares the user groups inequitably and requests that the document make a direct comparison. The comparison was in relation to an overview of existing recreational trail use as a means to understand the behavior of trail users and their recreational response to changes in trail use. The intent of the trail change-in-use process is not to provide technically or physically challenging trails. The intent, as noted in Section 8.3 of the Draft Program EIR, is simply to provide an alternate but sustainable means of public access to the natural, scenic, cultural and ecological resources within the State Park System. In this context, the characteristics listed for each user type are appropriate and revising these characterizations would not affect the impact analysis. With respect to Appendix C, page 2-5, the comment presumably refers to the statement that trail evaluations "should consider trail design, behaviors and perceptions of current and prospective trail users that exacerbate conflict." The purpose of the checklist is not to assess a rider's motivation, but to attempt to address and eliminate the types of behaviors that lead to conflict. No further comment is required. |
| P281-3                   | <p>It is CSP's experience that while a very limited number of trails could possibly be opened "as is," the vast majority require modifications either for use appropriate design or sustainability. With respect to managing speed on roads and trails, speed control devices may not be appropriate or necessary for all trails. Regardless, the intent of this Process is not to open mountain bike trails (i.e., not to support a single use type), but to implement a process of objective evaluation for removal or addition of user types to existing trails, consistent with CSP policies. See Response to Comment P3-1.</p> <p>With respect to sustainability, safe and sustainable trails are not "mostly a function of user behavior." As noted in the Glossary of the Draft Program EIR, a sustainable trail is one that was designed, constructed, or reconstructed to a standard such that it does not adversely affect</p>                                                                                                                                                                                                                                                                                                                                                                                                                                             |

natural and cultural resources, can withstand the impacts of the intended users and the natural elements while receiving only routine cyclic maintenance, and meets the needs of the intended users to the degree that they do not deviate from the established trail alignment.

- P281-4 As noted in Response to Comment P281-3 above, the intent of this process is not to provide new mountain bike trails (i.e., not to support one particular use type). It is an objective evaluation process proposed to consider addition or removal of different user types to and from existing trails, consistent with CSP policies. Please refer to response to comment O2-11 and Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. See also Responses to Comments P3-1.
- P281-5 CSP acknowledges that the Process evaluated in the Draft Program EIR would not, by itself, lead to an immediate increase in trails open to mountain bikes. The Process does not, nor was it intended to identify a methodology by which any backlog could be addressed. It is intended to make the evaluation and CEQA process for change-in-use proposals consistent and objective and, where a proposal is within the scope of the Program EIR, allow consideration using the information in the Program EIR, rather than preparing another complex environmental document.
- Few trails in the CSP system are likely to have mountain bike-ready design without performing some level of modification or repair. In theory, even if there was a trail that could sustainably accommodate mountain bikes, a baseline conditions assessment must be prepared against which any impacts of its change in use can be evaluated.
- P281-6 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. Please refer to response to comment O4-11. The comment does not state why a subjective decision must be made and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.
- P281-7 Please refer to response to comment O4-6.
- P281-8 Please refer to response to comment O2-15.
- P281-9 It is standard practice to allow the soil and materials to settle and compact after reconstruction before a trail opens to the public. Generally, a wet-dry cycle is required for adequate compaction. If other approaches to achieve adequate compaction are applicable to the setting of a change-in-use proposal, the District can add them as PSRs during the proposal review.
- P281-10 The most common closing time for operating hours at state park units is based on sundown or darkness. Trail access is generally not available after dark in the very large majority of park units statewide. A District may choose to allow later trail access. In the Angeles District, for instance, many parks units operate until dusk while others, such as Rio de Los Angeles State Park, close at 10:30 pm. Hours of operation are posted on the park's web page.
- P281-11 Please refer to response to comment O4-14.
- P281-12 This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.

- P281-13 Please refer to Response to Comment P281-4 above.
- P281-14 Please refer to response to comment O4-13.
- P281-15 The information for the noted section was obtained from District field staff and is documented in the CSP Statistical Report for FY 2009/2010. The statistical report is available on the CSP website.
- P281-16 Please refer to Response to Comment P281-2 above.
- P281-17 Although speed control through appropriate rider behavior is the ideal, trail users do not always exhibit appropriate behavior. Therefore, sometimes speed control devices would be necessary, in part to ensure that other users have the expectation of safety. Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.
- P281-18 Please refer to Master Response 4, Comments Related to California Public Resources Code 5019.53 and Limits of Development in State Parks That Are Considered "Attractions in Themselves."
- P281-19 Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses, and response to comment O2-11.
- P281-20 Comment is noted. No further response is necessary.
- P281-21 Comment is noted. No further response is necessary.
- P281-22 Comment is noted. No further response is necessary.
- P281-23 Comment is noted. Thank you for resubmitting your NOP comment letter; CSP apologizes for the oversight. The NOP comment letter attached by the commenter is noted for consideration during project review.
- P281-24 This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.
- P281-25 Please refer to Master Response 4, Comments Related to California Public Resources Code 5019.53 and Limits of Development in State Parks That Are Considered "Attractions in Themselves." The comment offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate.
- P281-26 Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.
- P281-27 Although the mission of CSP is in part, to provide for the health of the people of California, the primary purpose of the trails is enjoyment of high resource values found in the park units. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. This comment does not raise environmental issues or concerns regarding the

adequacy, accuracy, or completeness of the environmental document. No further response is necessary.

P281-28 Please refer to response to comment O4-9.

P281-29 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.

P281-30 Thank you for resubmitting this NOP comment letter. The letter will be considered during project review.

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**Response  
P282**      **Hauswald, Vanessa  
11/16/2012**

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P282-1 The commenter's support for mountain biking is noted.

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**Response  
P283**      **Hawner, Duane  
11/16/2012**

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P283-1 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P284**      **Haye, George  
11/16/2012**

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P284-1 See Response to Comment P3-1.

P284-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P285**      **Heath, Rick  
11/25/2012**

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P285-1 The commenter's support for the proposed Process is noted.

P285-2 See Response to Comment P12-1.

P285-3 Issues related to an increase in park personnel would be debated during project-specific analysis.

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| <b>Response<br/>P286</b> | <b>Heede, Michael<br/>11/19/2012</b>                                                                                 |
| P286-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P287</b> | <b>Heidner, Kurt<br/>11/19/2012</b>                                                                                  |
| P287-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P288</b> | <b>Helmstetler, Doug<br/>11/16/2012</b>                                                                              |
| P288-1                   | See Response to Comment P3-1.                                                                                        |
| P288-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P289</b> | <b>Henke, Richard<br/>11/27/2012</b>                                                                                 |
| P289-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P290</b> | <b>Henmi, Russell<br/>11/17/2012</b>                                                                                 |
| P290-1                   | See Response to Comment P3-1.                                                                                        |
| P290-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P291</b> | <b>Hennig, Caroline<br/>11/17/2012</b>                                                                               |
| P291-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P292</b> | <b>Henning, Carol<br/>10/27/2012</b>                                                                                                                                                                                                                                                |
| P292-1                   | Issues related to use-appropriate design of trails, trail safety, and risks of accidents are evaluated in Section 4.9, Hazards and Hazardous Materials, of the Draft Program EIR. Please also refer to Master Response 2, Comments Related to Safety on Multi-Use Trails and O2-13. |
| <b>Response<br/>P293</b> | <b>Heskett, Michael<br/>11/27/2012</b>                                                                                                                                                                                                                                              |
| P293-1                   | See Response to Comment P12-1.                                                                                                                                                                                                                                                      |
| P293-2                   | See Master Response 1, Clarifications Related to the Purpose and Intent of the Program EIR.                                                                                                                                                                                         |
| <b>Response<br/>P294</b> | <b>Hess, Eric<br/>11/19/2012</b>                                                                                                                                                                                                                                                    |
| P294-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                               |
| <b>Response<br/>P295</b> | <b>Hill, Gary<br/>11/16/2012</b>                                                                                                                                                                                                                                                    |
| P295-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                               |
| <b>Response<br/>P296</b> | <b>Hill, Gary<br/>11/27/2012</b>                                                                                                                                                                                                                                                    |
| P296-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                               |
| <b>Response<br/>P297</b> | <b>Hillard, Erik<br/>11/27/2012</b>                                                                                                                                                                                                                                                 |
| P297-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                       |
| P297-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                |

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| <b>Response<br/>P298</b> | <b>Himes, Daniel<br/>11/19/2012</b>                                                                                  |
| P298-1                   | The commenter's support for the proposed Process is noted.                                                           |
| <b>Response<br/>P299</b> | <b>Hirt, Brian<br/>11/17/2012</b>                                                                                    |
| P299-1                   | See Response to Comment P3-1.                                                                                        |
| P299-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P300</b> | <b>Hobbs, Rick<br/>11/29/2012</b>                                                                                    |
| P300-1                   | See Response to Comment P3-1.                                                                                        |
| P300-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P301</b> | <b>Hodzic, Edin<br/>11/27/2012</b>                                                                                   |
| P301-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P302</b> | <b>Holliday, Jeannette<br/>11/16/2012</b>                                                                            |
| P302-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P303</b> | <b>Holt, Ron<br/>11/16/2012</b>                                                                                      |
| P303-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P304</b> | <b>Hooks, Daniel<br/>11/18/2012</b>                                                                                  |
| P304-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P305</b> | <b>Hoover, Mark<br/>11/27/2012</b>                                                                                   |
| P305-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P306</b> | <b>Hopkinson, Peter<br/>11/27/2012</b>                                                                               |
| P306-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P307</b> | <b>Horning, John<br/>11/29/2012</b>                                                                                  |
| P307-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P308</b> | <b>Horowitz, Robert<br/>11/18/2012</b>                                                                               |
| P308-1                   | See Response to Comment P3-1.                                                                                        |
| P308-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P309</b> | <b>Horowitz, Robert<br/>11/30/2012</b>                                                                               |
| P309-1                   | See Response to Comment P3-1.                                                                                        |

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| <b>Response<br/>P310</b> | <b>Hosmer, Jordan<br/>12/03/2012</b>                                                                                 |
| P310-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P311</b> | <b>Hou, Dennis<br/>11/18/2012</b>                                                                                    |
| P311-1                   | See Response to Comment P3-1.                                                                                        |
| P311-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P312</b> | <b>Houkette, Gerald<br/>11/18/2012</b>                                                                               |
| P312-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P313</b> | <b>Howes, Dan<br/>11/28/2012</b>                                                                                     |
| P313-1                   | See Response to Comment P3-1.                                                                                        |
| P313-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P314</b> | <b>Hoyle, James<br/>11/27/2012</b>                                                                                   |
| P314-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P315</b> | <b>Hrach, Tracy<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                   |
| P315-1                   | Comment in support of park use is noted.                                                                                                                                                                                                                                                                                                                                                             |
| P315-2                   | Comment notes that many trails have been closed to mountain bikes in recent years.                                                                                                                                                                                                                                                                                                                   |
| P315-3                   | The comment expresses a desire for more trails open for mountain biking. Comment is noted.                                                                                                                                                                                                                                                                                                           |
| <b>Response<br/>P316</b> | <b>Hubbard, Robert<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                |
| P316-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                |
| <b>Response<br/>P317</b> | <b>Huey, Lloyd<br/>11/29/2012</b>                                                                                                                                                                                                                                                                                                                                                                    |
| P317-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                |
| <b>Response<br/>P318</b> | <b>Irving, Noreen<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                 |
| P318-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                        |
| P318-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P319</b> | <b>Isakson, Debbie<br/>12/04/2012</b>                                                                                                                                                                                                                                                                                                                                                                |
| P319-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. No specific information related to the environmental analysis was described; therefore, no further response can be provided. |
| P319-2                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                                                                                                                                                   |

P319-3 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. No specific information related to the environmental analysis was described; therefore, no further response can be provided.

P319-4 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.

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**Response  
P320** **Iverson, Steve**  
**11/28/2012**

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P320-1 See Response to Comment P3-1.

P320-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P321** **Ivey, Keven**  
**11/27/2012**

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P321-1 See Response to Comment P3-1.

P321-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P322** **Jacobson, Douglas**  
**11/16/2012**

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P322-1 See Response to Comment P3-1.

P322-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P323** **Jamali, Abdullah**  
**11/16/2012**

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P323-1 The commenter's support for mountain biking is noted.

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**Response  
P324**      **Jaramillo, John  
11/27/2012**

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P324-1      See Response to Comment P3-1.

P324-2      See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing  
"Attractions in Themselves."

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**Response  
P325**      **Jensen, Kurt  
11/27/2012**

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P325-1      The commenter's support for mountain biking is noted.

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**Response  
P326**      **Jesberg, Darin  
11/19/2012**

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P326-1      The commenter's support for mountain biking is noted.

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**Response  
P327**      **Johnson, Aaron  
11/16/2012**

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P327-1      The commenter's support for mountain biking is noted.

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**Response  
P328**      **Johnson, Shannon  
11/27/2012**

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P328-1      The commenter's support for mountain biking is noted.

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**Response  
P329**      **Jonson, Ted  
11/26/2012**

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P329-1      The commenter's support for mountain biking is noted.

| <b>Response<br/>P330</b> | <b>Joy, Jennifer<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| P330-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Response<br/>P331</b> | <b>Jozwiak, Jennifer<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| P331-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Response<br/>P332</b> | <b>Julian, Kathryn A.<br/>12/02/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| P332-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR and response to comment O2-17.                                                                                                                                                                                                                                                                                                                                                                                                                             |
| P332-2                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. This comment does not raise environmental issues or concerns regarding the adequacy , accuracy, or completeness of the environmental document. No further response is necessary.                                                                                                                                                                                                                                                                          |
| P332-3                   | Specific projects are not addressed in the Program EIR. Additionally, CSP does not propose converting all trails in the system to multi-use. Part of the Process entails considering if a trail use presently exists within the park unit. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR and response to comment O2-17. This comment does not raise environmental issues or concerns regarding the adequacy , accuracy, or completeness of the environmental document. No further response is necessary. |
| P332-4                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and response to comment O2-13. No specific information related to the environmental analysis was described; therefore, no further response can be provided.                                                                                                                                                                                                                                                                                                                   |
| P332-5                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and response to comment O2-13. No specific information related to the environmental analysis was described; therefore, no further response can be provided.                                                                                                                                                                                                                                                                                                                   |
| P332-6                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. No specific information related to the environmental analysis was described; therefore, no further response can be provided.                                                                                                                                                                                                                                                    |
| P332-7                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR and response to comment O2-17.                                                                                                                                                                                                                                                                                                                                                                                                                             |

P332-8 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. Please refer to Chapter 4.4-1, Terrestrial Biological Resources of the Draft Program EIR for the CEQA analysis of vegetation. Please refer to Chapter 3, Project Description, of the Draft Program EIR for a list of all SPRs related to vegetation (SPRs BIO-13 through BIO-28).

P332-9 Please refer to response to comment P332-8.

P332-10 This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

P332-11 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and response to comment O4-3.

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**Response  
P333** **Kanagy, Julie  
11/18/2012**

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P333-1 The commenter's support for mountain biking is noted.

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**Response  
P334** **Kangas, Chris  
11/27/2012**

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P334-1 The commenter's support for the proposed Process is noted.

P334.2 The commenter's support for mountain biking is noted.

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**Response  
P335** **Keays, Joe  
11/17/2012**

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P335-1 Comment expresses support for Stephen Messer and the Rim of the Valley loop trail. These comments do not apply to the proposed Process, no response is necessary.

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**Response  
P336** **Kelly, Brian  
11/27/2012**

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P336-1 See Response to Comment P3-1.

P336-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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| <b>Response<br/>P337</b> | <b>Kenney, James<br/>Unkown</b>                                                                                                                                                  |
| P337-1                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| <b>Response<br/>P338</b> | <b>Kenworthy, Keith<br/>12/03/2012</b>                                                                                                                                           |
| P338-1                   | See Response to Comment P3-1.                                                                                                                                                    |
| <b>Response<br/>P339</b> | <b>Kern, Roger<br/>11/28/2012</b>                                                                                                                                                |
| P339-1                   | The commenter's support for mountain biking is noted.                                                                                                                            |
| <b>Response<br/>P340</b> | <b>Kidder, Nat<br/>11/18/2012</b>                                                                                                                                                |
| P340-1                   | The commenter's support for mountain biking is noted.                                                                                                                            |
| <b>Response<br/>P341</b> | <b>Kilmer, Alan<br/>11/17/2012</b>                                                                                                                                               |
| P341-1                   | See Response to Comment P3-1.                                                                                                                                                    |
| P341-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                             |
| <b>Response<br/>P342</b> | <b>Kim, Mike<br/>11/27/2012</b>                                                                                                                                                  |
| P342-1                   | The commenter's support for mountain biking is noted.                                                                                                                            |

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| <b>Response<br/>P343</b> | <b>King, Brian<br/>11/27/2012</b>                                                                                                                                                                                                                                       |
| P343-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                           |
| P343-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                    |
| <b>Response<br/>P344</b> | <b>Kingsbury, John<br/>11/20/2012</b>                                                                                                                                                                                                                                   |
| P344-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                           |
| P344-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                    |
| <b>Response<br/>P345</b> | <b>Kintz, Mark<br/>11/16/2012</b>                                                                                                                                                                                                                                       |
| P345-1                   | The commenter's support for mountain biking is noted. See Response to Comments P79-1.                                                                                                                                                                                   |
| <b>Response<br/>P346</b> | <b>Kirstein, Jim<br/>11/03/2012</b>                                                                                                                                                                                                                                     |
| P346-1                   | Please refer to response to comment O2-15.                                                                                                                                                                                                                              |
| <b>Response<br/>P347</b> | <b>Klengler, Joan and Ingolf<br/>Unkown</b>                                                                                                                                                                                                                             |
| P347-1                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                      |
| P347-2                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| P347-3                   | This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.                           |

- P347-4 Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.
- P347-5 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. No specific information related to the environmental analysis was described; therefore, no further response can be provided.
- P347-6 Please refer to Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P348**      **Knoefel, Andreas  
12/01/2012**

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- P348-1 The commenter's support for mountain biking is noted.

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**Response  
P349**      **Kompa, Joshua  
11/27/2012**

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- P349-1 See Response to Comment P3-1.

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**Response  
P350**      **Kovacic, Mark  
12/03/2012**

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- P350-1 The commenter's support for mountain biking is noted.

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**Response  
P351**      **Kowaleski, Steve  
12/01/2012**

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- P351-1 The commenter's support for mountain biking is noted.

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**Response  
P352**      **Kramer, Mark  
11/27/2012**

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- P352-1 The commenter's support for mountain biking is noted.

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| <b>Response<br/>P353</b> | <b>Kross, John<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                             |
| P353-1                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                                                                                                                                                          |
| <b>Response<br/>P354</b> | <b>Kuhse, Darrel<br/>12/01/2012</b>                                                                                                                                                                                                                                                                                                                                       |
| P354-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P355</b> | <b>Kwok, John<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                          |
| P355-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P356</b> | <b>Kyes, Cedar<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                         |
| P356-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P357</b> | <b>Lam, Trung<br/>11/19/2012</b>                                                                                                                                                                                                                                                                                                                                          |
| P357-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                             |
| P357-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                      |
| <b>Response<br/>P358</b> | <b>Lamb, Brent C.<br/>10/16/2012</b>                                                                                                                                                                                                                                                                                                                                      |
| P358-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or |

completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

P358-2 Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

P358-3 This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

P358-4 This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.

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**Response  
P359**      **Lambert, Brooks  
11/26/2012**

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P359-1 The commenter's support for the proposed Process is noted.

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**Response  
P360**      **Lampert, Jeff  
11/16/2012**

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P360-1 See Response to Comment P3-1.

P360-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P361**      **Laspina, Lance  
11/17/2012**

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P361-1 The commenter's support for mountain biking is noted.

P361-2 Comment suggests alternate trail days for different user types. Comment is noted. See Response to Comment P47-1.

P361-3 See Response to Comment P79-1.

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| <b>Response<br/>P362</b> | <b>Laurent, Marc<br/>11/16/2012</b> |
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| P362-1 | The commenter's support for mountain biking is noted. |
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| <b>Response<br/>P363</b> | <b>Lawrence, Lane<br/>11/17/2012</b> |
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| P363-1 | The commenter's support for mountain biking is noted. |
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| <b>Response<br/>P364</b> | <b>Lawson, Ross<br/>11/27/2012</b> |
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| P364-1 | See Response to Comment P3-1.                                                                                        |
| P364-2 | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

  

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| <b>Response<br/>P365</b> | <b>Laxague, Deborah<br/>11/16/2012</b> |
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| P365-1 | See Response to Comment P3-1. |
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| <b>Response<br/>P366</b> | <b>Lazzarini, David<br/>12/04/2012</b> |
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| P366-1 | See Response to Comment P3-1.                                                                                        |
| P366-2 | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

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| <b>Response<br/>P367</b> | <b>Lee, Richard<br/>11/18/2012</b>                                                                                                                                                                                                            |
| P367-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                 |
| P367-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                          |
| <b>Response<br/>P368</b> | <b>Lentz, Alec<br/>11/27/2012</b>                                                                                                                                                                                                             |
| P368-1                   | The commenter’s support for mountain biking is noted.                                                                                                                                                                                         |
| <b>Response<br/>P369</b> | <b>Leong, Kato<br/>11/27/2012</b>                                                                                                                                                                                                             |
| P369-1                   | The commenter’s support for mountain biking is noted.                                                                                                                                                                                         |
| <b>Response<br/>P370</b> | <b>Leung, Andrew<br/>11/29/2012</b>                                                                                                                                                                                                           |
| P370-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                 |
| P370-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                          |
| <b>Response<br/>P371</b> | <b>Liebenberg, Paul<br/>11/20/2012</b>                                                                                                                                                                                                        |
| P371-1                   | This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary. |
| P371-2                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                          |

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| <b>Response<br/>P372</b> | <b>Liebert, David<br/>11/17/2012</b>                                                                                 |
| P372-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P373</b> | <b>Lobb, Skip<br/>11/26/2012</b>                                                                                     |
| P373-1                   | See Response to Comment P3-1.                                                                                        |
| <b>Response<br/>P374</b> | <b>Loften, Ryan<br/>11/30/2012</b>                                                                                   |
| P374-1                   | See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                           |
| <b>Response<br/>P375</b> | <b>Lohela, Eric<br/>11/16/2012</b>                                                                                   |
| P375-1                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P376</b> | <b>Lombard, Jason<br/>11/16/2012</b>                                                                                 |
| P376-1                   | See Response to Comment P3-1.                                                                                        |
| P376-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P377</b> | <b>Long, Joe<br/>11/16/2012</b>                                                                                      |
| P377-1                   | See Response to Comment P3-1.                                                                                        |
| P377-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

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| <b>Response<br/>P378</b> | <b>Loudenback, David<br/>11/16/2012</b>                                                                              |
| P378-1                   | See Response to Comment P3-1.                                                                                        |
| P378-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P379</b> | <b>Luman, Todd<br/>11/16/2012</b>                                                                                    |
| P379-1                   | See Response to Comment P3-1.                                                                                        |
| P379-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P380</b> | <b>Maak, Derek<br/>12/04/2012</b>                                                                                    |
| P380-1                   | See Response to Comment P3-1.                                                                                        |
| P380-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P381</b> | <b>MacKenzie, John<br/>11/16/2012</b>                                                                                |
| P381-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P382</b> | <b>MacKenzie, Scott<br/>11/30/2012</b>                                                                               |
| P382-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P383</b> | <b>Mackey, Ed<br/>11/28/2012</b>                                                                                                                                                                                                                                                                            |
| P383-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                               |
| P383-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                        |
| <b>Response<br/>P384</b> | <b>Mackey, Lauri<br/>11/29/2012</b>                                                                                                                                                                                                                                                                         |
| P384-1                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                        |
| <b>Response<br/>P385</b> | <b>Madeley, Philip<br/>11/27/2012</b>                                                                                                                                                                                                                                                                       |
| P385-1                   | Comment expresses support for trails. No response is necessary.                                                                                                                                                                                                                                             |
| <b>Response<br/>P386</b> | <b>Maker, Janet<br/>Unkown</b>                                                                                                                                                                                                                                                                              |
| P386-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                                                                                                                                                                      |
| P386-2                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses, and response to comment O4-20 and O2-7. |
| P386-3                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                                                                                            |
| P386-4                   | No specific information related to the environmental analysis was described; therefore, no further response can be provided.                                                                                                                                                                                |
| P386-5                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. The comment offers no specific information or evidence that the analysis presented in the Draft Program EIR is inadequate.                                                                           |

P386-6 No specific information related to the environmental analysis was described; therefore, no further response can be provided.

P386-7 No specific information related to the environmental analysis was described; therefore, no further response can be provided.

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**Response  
P387**

**Mallonee, Nick  
11/19/2012**

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P387-1 See Response to Comment P3-1.

P387-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P388**

**Manchester, Dana  
11/27/2012**

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P388-1 The commenter's support for mountain biking is noted.

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**Response  
P389**

**Mann, Doug  
11/20/2012**

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P389-1 The commenter's support for mountain biking is noted.

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**Response  
P390**

**Mann, Doug  
11/27/2012**

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P390-1 The commenter's support for mountain biking is noted.

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**Response  
P391**

**Manning, Cyril  
11/16/2012**

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P391-1 See Response to Comment P3-1.

P391-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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| <b>Response<br/>P392</b> | <b>Manwaring-Mueller, Family of<br/>10/18/2012</b>                                                                   |
| P392-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P393</b> | <b>Markovsky, James<br/>11/27/2012</b>                                                                               |
| P393-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P394</b> | <b>Martin, Hugo<br/>11/28/2012</b>                                                                                   |
| P394-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P395</b> | <b>Martin, Matthew<br/>11/18/2012</b>                                                                                |
| P395-1                   | See Response to Comment P3-1.                                                                                        |
| P395-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P396</b> | <b>Mason, Seth<br/>11/20/2012</b>                                                                                    |
| P396-1                   | See Response to Comment P3-1.                                                                                        |
| P396-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P397</b> | <b>Mathis, Hillary<br/>12/02/2012</b>                                                                                |
| P397-1                   | The commenter's support for mountain biking is noted.                                                                |

| <b>Response<br/>P398</b> | <b>Matocq, John<br/>11/05/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| P398-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Response<br/>P399</b> | <b>Matos, Jorge<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| P399-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| P399-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P400</b> | <b>Matthews, Todd<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| P400-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P401</b> | <b>Maxwell, Cynthia<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P401-1                   | See Response to Comment P192-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P401-2                   | See Response to Comment P192-2.                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P401-3                   | See Response to Comment P192-3.                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P401-4                   | See Response to Comment P192-4.                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P401-5                   | See Response to Comment P192-5.                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P401-6                   | See Response to Comment P192-6. CSP acknowledges that fire roads in State Parks are open to mountain bikes, as they are to all users. However, these fire roads do not always provide access to various points of interest or connectivity to other trails in and out of the State Park system. Therefore, limiting mountain bikes to fire roads necessarily limits accessibility of certain parks areas to a subset of park users. No further response to this comment is required. |

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| <b>Response<br/>P402</b> | <b>May, William<br/>11/18/2012</b>                                                                                   |
| P402-1                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P403</b> | <b>Mayers, Troy<br/>11/27/2012</b>                                                                                   |
| P403-1                   | The commenter's support for mountain biking is noted. See Response to Comment P79-1.                                 |
| <b>Response<br/>P404</b> | <b>Mayr, Troy<br/>11/27/2012</b>                                                                                     |
| P404-1                   | See Response to Comment P3-1.                                                                                        |
| P404-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P405</b> | <b>McCarthy, Brian<br/>11/29/2012</b>                                                                                |
| P405-1                   | See Response to Comment P3-1.                                                                                        |
| P405-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P406</b> | <b>McCarthy, Jim<br/>11/28/2012</b>                                                                                  |
| P406-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P407</b> | <b>McCauley, Kevin<br/>11/18/2012</b>                                                                                |
| P407-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P408</b> | <b>McCray, James<br/>12/02/2012</b>                                                                                  |
| P408-1                   | The commenter's support for mountain biking is noted. See Response to Comment P24-1.                                 |
| <hr/>                    |                                                                                                                      |
| <b>Response<br/>P409</b> | <b>McDonald, Scott<br/>11/29/2012</b>                                                                                |
| P409-1                   | See Response to Comment P3-1.                                                                                        |
| P409-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
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| <b>Response<br/>P410</b> | <b>McGuire, Sharon<br/>11/16/2012</b>                                                                                |
| P410-1                   | See Response to Comment P3-1.                                                                                        |
| P410-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
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| <b>Response<br/>P411</b> | <b>McIlvain, James<br/>11/27/2012</b>                                                                                |
| P411-1                   | See Response to Comment P3-1.                                                                                        |
| P411-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <hr/>                    |                                                                                                                      |
| <b>Response<br/>P412</b> | <b>McKee, Charles<br/>11/17/2012</b>                                                                                 |
| P412-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P413</b> | <b>McKenna, Sean<br/>11/19/2012</b>                                                                                                                                          |
| P413-1                   | The commenter's support for mountain biking is noted.                                                                                                                        |
| <b>Response<br/>P414</b> | <b>McKinsey, Mark<br/>11/27/2012</b>                                                                                                                                         |
| P414-1                   | See Response to Comment P79-1.                                                                                                                                               |
| <b>Response<br/>P415</b> | <b>McMahon, Todd<br/>11/17/2012</b>                                                                                                                                          |
| P415-1                   | Comment discusses the merits of different user types. See Master Response 1.                                                                                                 |
| <b>Response<br/>P416</b> | <b>Mcman, Mike<br/>11/26/2012</b>                                                                                                                                            |
| P416-1                   | See Master Response 4, Comments Related to California Public Resources Code 5019.53 and Limits of Development in State Parks that are Considered "Attraction in Themselves." |
| <b>Response<br/>P417</b> | <b>McNeill, James<br/>11/28/2012</b>                                                                                                                                         |
| P417-1                   | See Response to Comment P3-1.                                                                                                                                                |
| P417-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                         |
| <b>Response<br/>P418</b> | <b>McVicker, Robert<br/>11/16/2012</b>                                                                                                                                       |
| P418-1                   | See Response to Comment P33-1.                                                                                                                                               |

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| <b>Response<br/>P419</b> | <b>Mejia, Michael<br/>11/17/2012</b>                                                                                                                                                                                                |
| P419-1                   | See Response to Comment P3-1.                                                                                                                                                                                                       |
| P419-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                |
| <b>Response<br/>P420</b> | <b>Melkanoff, Fabienne<br/>Unknown</b>                                                                                                                                                                                              |
| P420-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. No specific information related to the environmental analysis was described; therefore, no further response can be provided. |
| <b>Response<br/>P421</b> | <b>Melton, Reed<br/>11/18/2012</b>                                                                                                                                                                                                  |
| P421-1                   | See Response to Comment P3-1.                                                                                                                                                                                                       |
| P421-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                |
| <b>Response<br/>P422</b> | <b>Mendelson, Barry<br/>11/19/2012</b>                                                                                                                                                                                              |
| P422-1                   | See Response to Comment P3-1.                                                                                                                                                                                                       |
| P422-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                |
| <b>Response<br/>P423</b> | <b>Menjou, Michael<br/>11/28/2012</b>                                                                                                                                                                                               |
| P423-1                   | Comment discusses the merits of different user types. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                                                                                    |

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| <b>Response<br/>P424</b> | <b>Mercado, Samuel<br/>11/27/2012</b>                                                                                                                                                                                                                                                                  |
| P424-1                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                                                                                             |
| <b>Response<br/>P425</b> | <b>Meyner, Gus<br/>12/03/2012</b>                                                                                                                                                                                                                                                                      |
| P425-1                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                                                                                             |
| <b>Response<br/>P426</b> | <b>Michelson, Erik<br/>11/28/2012</b>                                                                                                                                                                                                                                                                  |
| P426-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                  |
| <b>Response<br/>P427</b> | <b>Miketeit, Robert<br/>12/03/2012</b>                                                                                                                                                                                                                                                                 |
| P427-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                          |
| P427-2                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                                                                                             |
| <b>Response<br/>P428</b> | <b>Miller, Barbara<br/>Unkown</b>                                                                                                                                                                                                                                                                      |
| P428-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails. No specific information related to the environmental analysis was described; therefore, no further response can be provided. |
| <b>Response<br/>P429</b> | <b>Miller, Johann<br/>11/27/2012</b>                                                                                                                                                                                                                                                                   |
| P429-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                  |

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| <b>Response<br/>P430</b> | <b>Miller, Jon<br/>11/17/2012</b>                                                                                                                                                                                                   |
| P430-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                               |
| <b>Response<br/>P431</b> | <b>Miller, Justin<br/>11/18/2012</b>                                                                                                                                                                                                |
| P431-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                               |
| <b>Response<br/>P432</b> | <b>Miller, Michael<br/>11/28/2012</b>                                                                                                                                                                                               |
| P432-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                               |
| <b>Response<br/>P433</b> | <b>Miller, Polly<br/>Unkown</b>                                                                                                                                                                                                     |
| P433-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. No specific information related to the environmental analysis was described; therefore, no further response can be provided. |
| <b>Response<br/>P434</b> | <b>Miller, Tom<br/>11/16/2012</b>                                                                                                                                                                                                   |
| P434-1                   | See Response to Comment P3-1.                                                                                                                                                                                                       |
| P434-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                |
| <b>Response<br/>P435</b> | <b>Minor, David<br/>11/16/2012</b>                                                                                                                                                                                                  |
| P435-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                               |

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| <b>Response<br/>P436</b> | <b>Miranda, Gary<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| P436-1                   | See Master Response 4, Comments Related to California Public Resources Code 35019.53 and Limits of Development in State Parks that are Considered "Attraction in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Response<br/>P437</b> | <b>Mittleman, Lucinda<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| P437-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| P437-2                   | This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review. No further response is necessary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Response<br/>P438</b> | <b>Moffitt, Robert<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P438-1                   | See Master Response 4, Comments Related to California Public Resources Code 35019.53 and Limits of Development in State Parks that are Considered "Attraction in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Response<br/>P439</b> | <b>Moggia, Al<br/>11/01/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| P439-1                   | Please refer to response to comment O1-6 and O5-13.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| P439-2                   | Change-in-use proposals that qualify for evaluation under the proposed Process will require CEQA review; however, it will be conducted in light of the information presented in the Program EIR, in accordance with CEQA Guidelines Section 15168. Projects that are fully within the scope of the Program EIR would rely on it for CEQA compliance. It is possible that an MND or EIR would be required, if a significant impact arose that was not addressed in the Program EIR. A lead agency must prepare an EIR if an action requires discretionary power by a public agency and it may result in a reasonably foreseeable indirect or direct significant effect on the environment (CEQA Guidelines Section 15060[c]). It is also conceivable that a Categorical Exemption or a Negative Declaration could be used for CEQA compliance, depending on the nature of trail improvements and potential effects. A Categorical Exemption may be prepared, if it falls within a class of projects, determined by the Secretary of Resources, to be exempt from the requirement for the preparation of an environmental document (CEQA Guidelines Sections |

15300 – 15333). A Negative Declaration may be prepared if an initial study shows that there would be no significant effects on the environment (CEQA Guidelines Section 15070).

Section 1.2 of the Draft Program EIR describes how a Program EIR may streamline the CEQA review for projects that are within the scope of the program or for which the Program EIR covers most environmental impact issues. For these categories of proposed change-in-use projects, the Program EIR could eliminate the need for a full scope EIR for future change-in-use projects.

- P439-3 As described above, in Response to Comment P439-2, a Program EIR may streamline the CEQA review for projects that are within the scope of the program or for which the Program EIR covers most environmental impact issues. This is a cost and time-efficient approach that does not diminish the extent of environmental review and resource protection applied in review of specific change-in-use projects. Roads or trails that require a full-scope EIR would need to be reviewed under an independent CEQA process and would have both a cost and time disadvantage, compared to change-in-use projects that qualify for review under the Process. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.
- P439-4 Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR and Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response  
P440**      **Monroy, Nick  
12/04/2012**

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- P440-1 The commenter encourages open park facilities. This comment does not address issues associated with the proposed Process or Program EIR. No response can be provided.

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**Response  
P441**      **Montagna, Chris  
12/02/2012**

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- P441-1 The commenter’s support for mountain biking is noted.

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**Response  
P442**      **Moore, Clayton  
11/27/2012**

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- P442-1 The commenter’s support for the proposed Process is noted.
- P442-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

| <b>Response<br/>P443</b> | <b>Moore, Mike<br/>11/27/2012</b>                                                                                    |
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| P443-1                   | See Response to Comment P3-1.                                                                                        |
| P443-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P444</b> | <b>Morgan, Jeff<br/>11/18/2012</b>                                                                                   |
| P444-1                   | See Response to Comment P3-1.                                                                                        |
| P444-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P445</b> | <b>Moritzburke, Peter<br/>11/22/2012</b>                                                                             |
| P445-1                   | See Response to Comment P3-1.                                                                                        |
| P445-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P446</b> | <b>Morse, Lisa<br/>12/03/2012</b>                                                                                    |
| P446-1                   | See Response to Comment P3-1.                                                                                        |
| P446-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| P446-3                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P447</b> | <b>Moskowitz, Mark<br/>11/18/2012</b>                                                                                                                                                                                                                                                                          |
| P447-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                  |
| P447-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                                                                                           |
| <b>Response<br/>P448</b> | <b>Moss, William<br/>11/17/2012</b>                                                                                                                                                                                                                                                                            |
| P448-1                   | The commenter’s support for mountain biking is noted.                                                                                                                                                                                                                                                          |
| <b>Response<br/>P449</b> | <b>Mouradi, Obay<br/>11/27/2012</b>                                                                                                                                                                                                                                                                            |
| P449-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                  |
| P449-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                                                                                           |
| <b>Response<br/>P450</b> | <b>Munoz, Christopher<br/>11/28/2012</b>                                                                                                                                                                                                                                                                       |
| P450-1                   | The commenter’s support for mountain biking is noted.                                                                                                                                                                                                                                                          |
| <b>Response<br/>P451</b> | <b>Murchie, Donald<br/>Unkown</b>                                                                                                                                                                                                                                                                              |
| P451-1                   | Commenter expresses concerns related to specific trails. This document is programmatic and is not intended to consider site-specific issues. See Master Response 1, Clarification Related to the Purpose and Intent of this Program EIR and Master Response 2, Comments Related to Safety on Multi-Use Trails. |

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| <b>Response<br/>P452</b> | <b>Murray, Mary<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                 |
| P452-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                              |
| <b>Response<br/>P453</b> | <b>Mussen, Stefan<br/>11/16/2012</b>                                                                                                                                                                                                                                                                               |
| P453-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                              |
| <b>Response<br/>P454</b> | <b>Mylne, John<br/>11/20/2012</b>                                                                                                                                                                                                                                                                                  |
| P454-1                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                               |
| <b>Response<br/>P455</b> | <b>Nag, Nitish<br/>11/19/2012</b>                                                                                                                                                                                                                                                                                  |
| P455-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                      |
| P455-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                               |
| <b>Response<br/>P456</b> | <b>Nam, Paul<br/>Unkown</b>                                                                                                                                                                                                                                                                                        |
| P456-1                   | Please refer to response to comment O2-17.                                                                                                                                                                                                                                                                         |
| P456-2                   | Please refer to Section 3.3.3 of the Draft Program EIR for the language requested.                                                                                                                                                                                                                                 |
| P456-3                   | This comment is noted. However, this title is consistent with the title of the section it is referencing in the Draft Program EIR. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary. |
| P456-4                   | The Trail Handbook is being reviewed and revised by CSP. A final version of a revised handbook is not scheduled to be completed prior to CSP's decision about the proposed Process. Please also refer to response to comment O4-9.                                                                                 |

- P456-5 The Trail Handbook is being reviewed and revised by CSP. A final version of a revised handbook is not scheduled to be completed prior to CSP's decision about the proposed Process. Please also refer to response to comment O4-9.
- P456-6 This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.
- P456-7 This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.
- P456-8 CSP considers connectivity with the National Park Service, the US Forest Service, the Bay Area Ridge Trail Council, and other agencies to be part of the Process. However, the number of federal, city, county and regional parks and open space agencies that have some type of trail component within, are simply too vast to comprehensively include within this document. The comment is noted for consideration during project review. No further response is necessary.
- P456-9 Please refer to response to comment O2-17.
- P456-10 Please refer to response to comment O10-4.
- P456-11 The comment is noted. No further response is necessary.
- P456-12 The different types of materials and construction design details of pinch points would vary depending on the setting and available local materials. They would be determined at the time of a specific change-in-use proposal and is not addressed at the programmatic level of analysis in this CEQA document. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.
- P456-13 The commenter correctly states that it may not always be practical to inspect trails after large storm or rainfall events, as required in SPR GEO-29. As described in Section 3.6, Project Requirements and Change-In-Use Evaluation Process, of the Draft Program EIR, PSRs are written for, and applied to, proposals based on specific actions unique to a project and/or area that are necessary to complete the project while protecting resources. They are design, construction, and management features developed as part of the Process and incorporated by the appropriate CSP District staff into the description of the change-in-use proposal. If the impact would be significant and unavoidable despite the implementation of SPRs, PSRs, and mitigation measures, the project would not qualify for approval using the proposed Process, but rather would require its own independent CEQA compliance process.
- P456-14 As described in Section 3.3.4 of the Draft Program EIR, the CSP Departmental Operation Manuals provide internal guidance to District personnel regarding an array of use, operation, and resource management activities conducted in State Park units. Additionally, the Trails Handbook provides guidelines for CSP staff for trail construction and maintenance activities. These issues are not subject to debate in the Process, nor do they pertain to the environmental analysis in the EIR. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.
- P456-15 Alternatives to a proposed project must feasibly attain most of the basic objectives of the project, but avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines Section 15126.6). The alternatives described on pages 7-5 and 7-6 of the Draft

Program EIR did not meet the basic objectives of the project or were not viable because of conflicts with the State Trail Policy, as concluded under each potential alternative. They, therefore, cannot be considered as an option.

Feasible alternatives are described in Section 7.2 of the Draft Program EIR and consist of the No Project Alternative and the Complete Impact Avoidance Alternative.

P456-16 Please refer to Master Response 4, Comments Related to California Public Resources Code 5019.53 and Limits of Development in State Parks That Are Considered "Attractions in Themselves."

P456-17 Please refer to analysis in Section 4.6.5 of the Draft Program EIR. A road or trail that is proposed for a change in use will be evaluated for its historic or prehistoric significance. A change in use itself would not necessarily result in a significant adverse impact; however, a realignment and/or destruction of a particular trail feature would disqualify a trail for a change in use.

P456-18 Please refer to response to comment O2-17 and P456-5.

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**Response  
P457**      **Nam, Paul  
Unkown**

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P457-1 Please see Response to Comment Letter P456.

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**Response  
P458**      **Navarro, Luis  
11/27/2012**

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P458-1 The commenter's support for mountain biking is noted.

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**Response  
P459**      **Nelson, Dolores  
12/03/2012**

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P459-1 The commenter's support for the proposed Process is noted.

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**Response  
P460**      **Neuman, Emily  
11/16/2012**

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P460-1 The commenter's support for the proposed Process is noted.

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| <b>Response<br/>P461</b> | <b>Neumann, Lon<br/>12/01/2012</b> |
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| P461-1 | The commenter's opposition to mountain biking is noted. |
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| <b>Response<br/>P462</b> | <b>Nguyen, Tom<br/>11/27/2012</b> |
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| P462-1 | The commenter's support for mountain biking is noted. Addition and removal of a user type has the potential to cause environmental impacts, many of which can be reduced to a less-than-significant level through implementation of the SPRs described in Section 3.8 of the Draft Program EIR (see Chapter 4 of the Draft Program EIR for a discussion of potential impacts). Because change-in-use project require a discretionary action by CSP and could result in environmental impacts, an EIR must be prepared pursuant to CEQA Guidelines Section 15060. Adoption of the Process and certification of the Program EIR could simplify future environmental documents for change-in-use proposals. See Section 1.1 of the Draft Program EIR for a discussion on the purpose and intended uses of the Program EIR. |
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| <b>Response<br/>P463</b> | <b>Niles, Bill<br/>11/28/2012</b> |
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| P463-1 | The commenter's expression of support for the proposed Process is noted. |
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| <b>Response<br/>P464</b> | <b>Nixon, Brian<br/>Unkown</b> |
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| P464-1 | See Response to Comment P3-1. |
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| <b>Response<br/>P465</b> | <b>No Last Name, Charmaine<br/>Unkown</b> |
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| P465-1 | See Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                              |
| P465-2 | See Master Response 2, Comments Related to Safety on Multi-Use Trails and Master Response 4, Comments Related to California Public Resources Code 5019.53 and Limits of Development in State Parks That Are Considered "Attractions in Themselves." |

P465-3 Impact 4.14-4, Indirect adverse effects to existing, off-site trail facilities, states that “CSP would consider the displacement of users and coordinate with agencies with facilities near change-in-use proposals to confirm adequate capacity at other nearby trails facilities.” This is concluded to be a less-than-significant impact because patterns of existing trail use would typically return to an equilibrium that would not be substantially different than prior to the change-in-use decision. Also see the discussion related to trail use conflict is addressed in Chapter 8 of the Draft Program EIR. See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.

P465-4 See Master Response 2, Comments Related to Safety on Multi-Use Trails.

P465-5 This comment states that the proposed Process would cause environmental damage, but does not raise specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The Program EIR provides analysis regarding a full spectrum of environmental issues and potential significant effects on the environment. No further response is necessary.

P465-6 See Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses

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**Response**  
**P466**

**No Last Name, Pete**  
**11/23/2012**

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P466-1 See Response to Comment P3-1.

P466-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response**  
**P467**

**Nordstrom, Ben**  
**11/27/2012**

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P467-1 See Response to Comment P3-1.

P467-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”

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**Response**  
**P468**

**Nsek, Iffiok-Obong**  
**11/18/2012**

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P468-1 The commenter’s support for mountain biking is noted.

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| <b>Response<br/>P469</b> | <b>Nunes, Robert<br/>11/28/2012</b>                                                                                  |
| P469-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P470</b> | <b>Nunez, Daniel<br/>11/16/2012</b>                                                                                  |
| P470-1                   | See Response to Comment P3-1.                                                                                        |
| P470-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P471</b> | <b>Nunez, Daniel<br/>11/19/2012</b>                                                                                  |
| P471-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P472</b> | <b>Obregon, Ivo<br/>11/28/2012</b>                                                                                   |
| P472-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P473</b> | <b>Oehlberg, Dan<br/>11/16/2012</b>                                                                                  |
| P473-1                   | The commenter's support for the proposed Process is noted.                                                           |
| <b>Response<br/>P474</b> | <b>Ohnysty, Michael<br/>11/27/2012</b>                                                                               |
| P474-1                   | See Response to Comment P3-1.                                                                                        |
| P474-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

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| <b>Response<br/>P475</b> | <b>Olesiejuk, Tomasz<br/>11/27/2012</b>                                                                              |
| P475-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P476</b> | <b>Orosco, Carlos<br/>11/28/2012</b>                                                                                 |
| P476-1                   | See Response to Comment P3-1.                                                                                        |
| P476-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P477</b> | <b>Orth, Joel<br/>11/17/2012</b>                                                                                     |
| P477-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P478</b> | <b>Ortiz, Matthew<br/>11/17/2012</b>                                                                                 |
| P478-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P479</b> | <b>Ottusch, Sonia<br/>11/28/2012</b>                                                                                 |
| P479-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P480</b> | <b>Owen, Scott<br/>11/30/2012</b>                                                                                    |
| P480-1                   | The commenter's support for mountain biking is noted.                                                                |

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| <b>Response<br/>P481</b> | <b>Page, Dan<br/>12/04/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P481-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Response<br/>P482</b> | <b>Paugh, Kevin<br/>12/30/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| P482-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P483</b> | <b>Paulson, Jeff<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| P483-1                   | See Master Response 4, Comments Related to California Public Resources Code 35019.53 and Limits of Development in State Parks that are Considered "Attraction in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P484</b> | <b>Pelot, Sante<br/>12/04/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| P484-1                   | The commenter's support for mountain biking is noted. The commenter suggests a process of converting existing trails to multi-use trails, and adapting to the resulting environmental impacts as they are realized. However, this proposed method would violate the legislative intent of CEQA (PRC 21000), which generally aims to ensure a high quality environment in California. As a method to achieve this objective, environmental impact reports are prepared "to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (PRC 21002.1[a])." Therefore, because potential environmental effects resulting from the conversion of existing trails to multi-use trails can be anticipated, environmental impact reports are necessary to comply with CEQA. |
| <b>Response<br/>P485</b> | <b>Perkins, Bryce<br/>11/26/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| P485-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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| <b>Response<br/>P486</b> | <b>Petzel, James<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                        |
| P486-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                              |
| P486-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                       |
| <b>Response<br/>P487</b> | <b>Pfeiffer, Katherine<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                  |
| P487-1                   | The commenter's concerns for safety on multi-use trails are noted, however, the subject trail, Griffith Park is not part of the CSP system. See Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                         |
| <b>Response<br/>P488</b> | <b>Philip, James<br/>10/17/2012</b>                                                                                                                                                                                                                                                                                                        |
| P488-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                              |
| P488-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                       |
| <b>Response<br/>P489</b> | <b>Phillips, Harley<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                     |
| P489-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                              |
| P489-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                       |
| <b>Response<br/>P490</b> | <b>Piasecki, Tracy<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                      |
| P490-1                   | The commenter's concerns for safety on multi-use trails are noted; however, the subject trail, Griffith Park is not part of the CSP system. See Master Response 2, Comments Related to Safety on Multi-Use Trails. Issues related to specific trails and horse-boarding facilities are not within the scope of the environmental document. |

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| <b>Response<br/>P491</b> | <b>Pierroz, Bert<br/>10/19/2012</b>                                                                                                                                                                                               |
| P491-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                             |
| <b>Response<br/>P492</b> | <b>Pohlman, Dean<br/>12/05/2012</b>                                                                                                                                                                                               |
| P492-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                             |
| <b>Response<br/>P493</b> | <b>Polis, Richie<br/>12/05/2012</b>                                                                                                                                                                                               |
| P493-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                             |
| <b>Response<br/>P494</b> | <b>Poltronetti, Trent<br/>11/27/2012</b>                                                                                                                                                                                          |
| P494-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                             |
| <b>Response<br/>P495</b> | <b>Polvorosa, Brad<br/>11/16/2012</b>                                                                                                                                                                                             |
| P495-1                   | See Response to Comment P3-1.                                                                                                                                                                                                     |
| <b>Response<br/>P496</b> | <b>Ponting, Robert<br/>11/27/2012</b>                                                                                                                                                                                             |
| P496-1                   | See Response to Comment P3-1. The commenter's suggestion of "bear bells" is noted. See Impact 4.9-4: Change in Trail Safety, for a discussion of the potential for a change in use of a CSP road or trail to affect trail safety. |
| P496-2                   | The comment's opinion that not all trails should be multi-use is noted.                                                                                                                                                           |
| P496-3                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                        |

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| <b>Response<br/>P497</b> | <b>Popov, Lubomir<br/>11/27/2012</b>                                                                                                                                                                                                                                    |
| P497-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                           |
| P497-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                    |
| <b>Response<br/>P498</b> | <b>Posch, Chris<br/>11/27/2012</b>                                                                                                                                                                                                                                      |
| P498-1                   | Comment suggests that bikers use bells to alert other trail users. Comment is noted.                                                                                                                                                                                    |
| <b>Response<br/>P499</b> | <b>Pousman, Robert<br/>11/19/2012</b>                                                                                                                                                                                                                                   |
| P499-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                   |
| <b>Response<br/>P500</b> | <b>Poussin, JC<br/>11/16/2012</b>                                                                                                                                                                                                                                       |
| P500-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                           |
| P500-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                    |
| <b>Response<br/>P501</b> | <b>Prager, Carol<br/>11/16/2012</b>                                                                                                                                                                                                                                     |
| P501-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| P501-2                   | See Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                                  |
| P501-3                   | The proposed Process does not include consideration of changing user rights-of-way. No further response is necessary.                                                                                                                                                   |

P501-4 See Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

P501-5 This comment refers to the use of public funds and personal preferences associated with trails. This does not address the environmental analysis. See Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.

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**Response  
P502** Praly, Sebastien  
11/08/2012

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P502-1 The commenter's support for mountain biking is noted.

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**Response  
P503** Prianto, Reco  
11/16/2012

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P503-1 The commenter's support for mountain biking is noted.

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**Response  
P504** Price, Matthew  
11/28/2012

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P504-1 The commenter's support for mountain biking is noted. See Response to Comment P3-1.

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**Response  
P505** Price, Noelani  
11/29/2012

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P505-1 See Response to Comment P3-1.

P505-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P506** Priestley, Lisa  
11/28/2012

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P506-1 See Response to Comment P3-1.

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| <b>Response<br/>P507</b> | <b>Prince, Sherry<br/>11/30/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                     |
| P507-1                   | See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR, and Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P508</b> | <b>Pritchard, Adrien<br/>11/14/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                  |
| P508-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                            |
| P508-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P509</b> | <b>Pritchett, Jacob<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                   |
| P509-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                            |
| P509-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P510</b> | <b>Prochazka, Ingeborg<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                |
| P510-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                                                                                                                                  |
| <b>Response<br/>P511</b> | <b>Procter, David<br/>11/23/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                     |
| P511-1                   | The commenter’s support for mountain biking is noted. While the commenter disagrees with a need for extensive analysis or study of trails to ensure they can be altered for bike access, various environmental effects could result from this conversion. These effects are described throughout the Draft Program EIR, as required by CEQA. See Chapter 8, Trail Use Conflicts, for a discussion of issues related to multi-use trails. |

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| <b>Response<br/>P512</b> | <b>Prosser, Ken<br/>11/17/2012</b>                                                                                                                                           |
| P512-1                   | See Response to Comment P3-1.                                                                                                                                                |
| P512-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                         |
| <b>Response<br/>P513</b> | <b>Purdy, Allen<br/>11/16/2012</b>                                                                                                                                           |
| P513-1                   | See Master Response 4, Comments Related to California Public Resources Code 5019.53 and Limits of Development in State Parks that are Considered "Attraction in Themselves." |
| P513-2                   | See Response to Comment P79-1.                                                                                                                                               |
| <b>Response<br/>P514</b> | <b>Putz, Randall<br/>11/20/2012</b>                                                                                                                                          |
| P514-1                   | The commenter's support for mountain biking is noted.                                                                                                                        |
| <b>Response<br/>P515</b> | <b>Quaglia, John<br/>11/27/2012</b>                                                                                                                                          |
| P515-1                   | See Response to Comment P3-1.                                                                                                                                                |
| P515-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                         |
| <b>Response<br/>P516</b> | <b>Quinn, Betsy<br/>11/18/2012</b>                                                                                                                                           |
| P516-1                   | See Response to Comment P3-1. Regarding the use of bells, see Response to Comment P496-1.                                                                                    |
| P516-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                         |
| P516-3                   | The commenter's support for the proposed Process is noted.                                                                                                                   |

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| <b>Response<br/>P517</b> | <b>Quintel, David<br/>11/28/2012</b>                                                                                 |
| P517-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P518</b> | <b>Raleigh, Ken<br/>11/28/2012</b>                                                                                   |
| P518-1                   | See Response to Comment P3-1.                                                                                        |
| P518-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P519</b> | <b>Ralph, Phil<br/>11/27/2012</b>                                                                                    |
| P519-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P520</b> | <b>Raman, Vivek<br/>12/03/2012</b>                                                                                   |
| P520-1                   | See Response to Comment P3-1.                                                                                        |
| P520-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P521</b> | <b>Rappoport, Linda<br/>11/17/2012</b>                                                                               |
| P521-1                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.                                   |
| <b>Response<br/>P522</b> | <b>Rappoport, Linda<br/>Unkown</b>                                                                                   |
| P522-1                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.                                   |

- P522-2 Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. Potential effects to geology and soils from erosion are discussed in Impact 4.7-2, Erosion and Loss of Top Soil.
- P522-3 Potential effects to geology and soils from erosion are discussed in Impact 4.7-2, Erosion and Loss of Top Soil.
- P522-4 Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.
- P522-5 Potential effects to geology and soils from erosion are discussed in Impact 4.7-2, Erosion and Loss of Top Soil. P522-6 This comment addresses the general use of mountain bikes on trails. No environmental issues were raised and no further response is necessary.

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**Response  
P523**      **Reed, Rick  
Unkown**

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- P523-1 See Response to Comment P3-1.
- P523-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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**Response  
P524**      **Reed, Shane  
11/19/2012**

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- P524-1 The commenter's support for mountain biking is noted. Also, see Response to Comment P3-1.
- P524-2 See Master Response 3, Comments Related to Trail Design to Accommodate New Recreation Uses. Also, see Response to Comment P3-1.

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**Response  
P525**      **Reents, Gary  
12/04/2012**

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- P525-1 See Response to Comment P3-1.
- P525-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."

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| <b>Response<br/>P526</b> | <b>Reynolds, Doug<br/>11/16/2012</b>                                                                                            |
| P526-1                   | The commenter's support for mountain biking is noted.                                                                           |
| <b>Response<br/>P527</b> | <b>Rhoades, Brian<br/>11/27/2012</b>                                                                                            |
| P527-1                   | See Response to Comment P3-1.                                                                                                   |
| P527-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."            |
| <b>Response<br/>P528</b> | <b>Rhodes, Rebecca<br/>11/28/2012</b>                                                                                           |
| P528-1                   | The commenter's support for mountain biking is noted.                                                                           |
| <b>Response<br/>P529</b> | <b>Richardson, Roy<br/>11/19/2012</b>                                                                                           |
| P529-1                   | See Master Response 3, Comments Related to Trail Design to Accommodate New Recreation Uses. Also, see Response to Comment P3-1. |
| P529-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."            |
| <b>Response<br/>P530</b> | <b>Richardson, Todd<br/>11/28/2012</b>                                                                                          |
| P530-1                   | See Response to Comment P3-1.                                                                                                   |
| P530-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."            |

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| <b>Response<br/>P531</b> | <b>Richter, Eric<br/>12/03/2012</b>                                                                                                                                                                                                                    |
| P531-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                  |
| P531-2                   | See Master Response 3, Comments Related to Trail Design to Accommodate New Recreation Uses. Also, see Response to Comment P3-1.                                                                                                                        |
| <b>Response<br/>P532</b> | <b>Ridgeway, Jean<br/>11/16/2012</b>                                                                                                                                                                                                                   |
| P532-1                   | Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                                                                                                              |
| P532-2                   | This Program EIR is not intended to address specific trails within the CSP system. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                              |
| P532-3                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                     |
| <b>Response<br/>P533</b> | <b>Riepe, Michael<br/>Unkown</b>                                                                                                                                                                                                                       |
| P533-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                  |
| P533-2                   | The commenter's support for mountain biking is noted. The commenter states that change in use could affect revenue. Economic considerations are not environmental issues within the scope of the Program EIR, and no further response can be provided. |
| P533-3                   | See Response to Comment P3-1. See also Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                |
| P533-4                   | See Response to Comment P3-1. See also Master Response 3, Comments Related to Trail Design to Accommodate New Recreation Uses.                                                                                                                         |
| <b>Response<br/>P534</b> | <b>Riklin, Julie<br/>11/30/2012</b>                                                                                                                                                                                                                    |
| P534-1                   | See Response to Comment P3-1. The commenter's support for mountain biking is noted.                                                                                                                                                                    |

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| <b>Response<br/>P535</b> | <b>Riva, Jim<br/>11/28/2012</b>                                                                                                                                                                                                                                                             |
| P535-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                       |
| <b>Response<br/>P536</b> | <b>Roberts, Keli<br/>12/03/2012</b>                                                                                                                                                                                                                                                         |
| P536-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                       |
| <b>Response<br/>P537</b> | <b>Roberts, Philip<br/>11/16/2012</b>                                                                                                                                                                                                                                                       |
| P537-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                               |
| P537-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                        |
| <b>Response<br/>P538</b> | <b>Robertson, Greg<br/>11/30/2012</b>                                                                                                                                                                                                                                                       |
| P538-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                               |
| P538-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                        |
| <b>Response<br/>P539</b> | <b>Robertson, Jeanne<br/>11/18/2012</b>                                                                                                                                                                                                                                                     |
| P539-1                   | Comment suggests opening trails in the Sycamore Cover area in Malibu. This Program EIR is not intended to address specific roads or trails, or specific uses within a particular geographic location. Requests for changes in use should be conveyed to the appropriate District personnel. |

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| <b>Response<br/>P540</b> | <b>Robertson, Jim<br/>11/30/2012</b>                                                                                                                                                                                                                                                                             |
| P540-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                          |
| <b>Response<br/>P541</b> | <b>Robins, Rob<br/>Unkown</b>                                                                                                                                                                                                                                                                                    |
| P541-1                   | Comment suggests opening trails from Auburn to Granite Bay. This Program EIR is not intended to address specific roads or trails, or specific uses within a particular geographic location. Requests for changes in use should be conveyed to the appropriate District personnel. See Response to Comment P12-1. |
| <b>Response<br/>P542</b> | <b>Romagnano, Frank<br/>12/03/2012</b>                                                                                                                                                                                                                                                                           |
| P542-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                            |
| <b>Response<br/>P543</b> | <b>Romano, Charles<br/>11/19/2012</b>                                                                                                                                                                                                                                                                            |
| P543-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                            |
| <b>Response<br/>P544</b> | <b>Ronda Jr, Gaspar<br/>11/18/2012</b>                                                                                                                                                                                                                                                                           |
| P544-1                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                                                                                                       |

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| <b>Response<br/>P545</b> | <b>Rormell, Jeff<br/>11/16/2012</b>                                                                                                                                                                       |
| P545-1                   | See Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                    |
| P545-2                   | Please refer to response to comment O2-8. The comment provides no specific evidence that the analysis presented in the EIR is inadequate, inaccurate, or inappropriate. No further response is necessary. |
| P545-3                   | Comment asserts that mountain bikers are being discriminated against. See Master Response 3, Comments Related to Trail Design to Accommodate New Recreation Uses.                                         |
| <b>Response<br/>P546</b> | <b>Rose, Michael<br/>11/27/2012</b>                                                                                                                                                                       |
| P546-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                     |
| <b>Response<br/>P547</b> | <b>Ross, Stewart<br/>11/27/2012</b>                                                                                                                                                                       |
| P547-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                     |
| <b>Response<br/>P548</b> | <b>Rosset, Chris<br/>11/17/2012</b>                                                                                                                                                                       |
| P548-1                   | See Response to Comment P3-1.                                                                                                                                                                             |
| P548-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                      |
| P548-3                   | See Response to Comments P79-1.                                                                                                                                                                           |
| <b>Response<br/>P549</b> | <b>Rossi, Marc<br/>11/19/2012</b>                                                                                                                                                                         |
| P549-1                   | See Response to Comment P3-1.                                                                                                                                                                             |
| P549-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                      |

| <b>Response<br/>P550</b> | <b>Routh, Robin<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                                                                                           |
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| P550-1                   | The comment addresses trails in Topanga State Park/Musch Trail. This Program EIR is not intended to address specific roads or trails, or specific uses within a particular geographic location. Requests for changes in use should be conveyed to the appropriate District personnel. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. |
| P550-2                   | This comment details personal experiences with mountain bikers on trails. No environmental issues are raised and no further response can be provided.                                                                                                                                                                                                                                        |
| P550-3                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                                                                                                                                           |
| P550-4                   | The comment addresses trails in Topanga State Park/Musch Trail. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                                                                                                                                                                                       |
| <b>Response<br/>P551</b> | <b>Rudolph, Gary<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                              |
| P551-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                |
| P551-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                         |
| <b>Response<br/>P552</b> | <b>Russell, Eric<br/>12/05/2012</b>                                                                                                                                                                                                                                                                                                                                                          |
| P552-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                |
| P552-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                         |
| <b>Response<br/>P553</b> | <b>Russo, Chris<br/>12/02/2012</b>                                                                                                                                                                                                                                                                                                                                                           |
| P553-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                        |

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| <b>Response<br/>P554</b> | <b>Sachs, Bonnie<br/>12/19/2012</b>                                                                                                                                                                                                                                     |
| P554-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| <b>Response<br/>P555</b> | <b>Sandine, Scott<br/>Unkown</b>                                                                                                                                                                                                                                        |
| P555-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                           |
| P555-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                    |
| <b>Response<br/>P556</b> | <b>Sandoval, Gerardo<br/>11/16/2012</b>                                                                                                                                                                                                                                 |
| P556-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                   |
| <b>Response<br/>P557</b> | <b>Santos, Deniel<br/>11/27/2012</b>                                                                                                                                                                                                                                    |
| P557-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                           |
| P557-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                    |
| <b>Response<br/>P558</b> | <b>Santucci, Jeff<br/>11/27/2012</b>                                                                                                                                                                                                                                    |
| P558-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                           |
| P558-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                    |

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| <b>Response<br/>P559</b> | <b>Satriano, Joseph<br/>12/03/2012</b>                                                           |
| P559-1                   | See Response to Comment P12-1.                                                                   |
| <b>Response<br/>P560</b> | <b>Saunders, Jason<br/>11/27/2012</b>                                                            |
| P560-1                   | Comment states that mountain bikers volunteer hundreds of hours in trail work. Comment is noted. |
| <b>Response<br/>P561</b> | <b>Savage, Justin<br/>11/27/2012</b>                                                             |
| P561-1                   | The commenter's support for the proposed Process is noted.                                       |
| <b>Response<br/>P562</b> | <b>Sayson, Rodolfo<br/>11/26/2012</b>                                                            |
| P562-1                   | Comment expresses appreciation for the mountains. Comment is noted.                              |
| <b>Response<br/>P563</b> | <b>Scheuer, No First Name<br/>Unkown</b>                                                         |
| P563-1                   | See Response to Comment P192-2.                                                                  |
| P563-2                   | See Response to Comment P192-3.                                                                  |
| P563-3                   | See Response to Comment P192-4.                                                                  |
| P563-4                   | See Response to Comment P192-5.                                                                  |
| P563-5                   | See Response to Comment P192-6.                                                                  |

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| <b>Response<br/>P564</b> | <b>Schmidt, Ernst<br/>11/19/2012</b>                                                                                                                                                                                                                                          |
| P564-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                 |
| <b>Response<br/>P565</b> | <b>Schmidt, Martin<br/>11/20/2012</b>                                                                                                                                                                                                                                         |
| P565-1                   | Comment suggests opening trails in the Folsom Lake SRA. This Program EIR is not intended to address specific roads or trails, or specific uses within a particular geographic location. Requests for changes in use should be conveyed to the appropriate District personnel. |
| <b>Response<br/>P566</b> | <b>Schroeder, Wayne<br/>11/27/2012</b>                                                                                                                                                                                                                                        |
| P566-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                 |
| P566-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                          |
| <b>Response<br/>P567</b> | <b>Schwartz, Alyce<br/>10/01/2012</b>                                                                                                                                                                                                                                         |
| P567-1                   | Comment addresses trails in Griffith Park. See Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                                                                                                         |
| P567-2                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                            |
| P567-3                   | Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                                                                                                                                     |
| <b>Response<br/>P568</b> | <b>Schwerin, Rich<br/>11/20/2012</b>                                                                                                                                                                                                                                          |
| P568-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                 |
| P568-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                          |

| <b>Response<br/>P569</b> | <b>Scribner, Jerry and Penny<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| P569-1                   | As described on page 3-4 of the Draft Program EIR, Departmental Policy Notice No. 2005-06 sets forth a procedure for establishing and approving trails and their appropriate uses and clarifies the management roles and responsibilities for implementation of the procedure within CSP; and Chapter 8 of the Draft PEIS describes trail use conflicts. The commenter is incorrect to state that the proposed Process is intended to open the entire state trail system to mountain bikers. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. |
| P569-2                   | Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| P569-3                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P569-4                   | Please refer to Master Response 2, Comments Related to Safety on Multi-Use Trails. The commenter's opposition to the Program is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P569-5                   | The commenter's personal experience with multi-use trails is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P570</b> | <b>Scruggs, Ray<br/>12/02/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P570-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Response<br/>P571</b> | <b>Seltzer, Rob<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P571-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P571-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Response<br/>P572</b> | <b>Shaputnic, Skip<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P572-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P572-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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| <b>Response<br/>P573</b> | <b>Sharp, Dustin<br/>11/16/2012</b>                                                                                  |
| P573-1                   | See Response to Comment P3-1.                                                                                        |
| P573-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.” |
| <b>Response<br/>P574</b> | <b>Sharp, Edward<br/>11/16/2012</b>                                                                                  |
| P574-1                   | The commenter’s support for mountain biking is noted. The commenter’s support for the proposed Process is noted.     |
| <b>Response<br/>P575</b> | <b>Shelp, Curt<br/>11/18/2012</b>                                                                                    |
| P575-1                   | The commenter’s support for mountain biking is noted.                                                                |
| <b>Response<br/>P576</b> | <b>Shepherd, Brendan<br/>11/16/2012</b>                                                                              |
| P576-1                   | The commenter’s support for mountain biking is noted.                                                                |
| <b>Response<br/>P577</b> | <b>Shevock, Ron<br/>11/20/2012</b>                                                                                   |
| P577-1                   | See Response to Comment P3-1.                                                                                        |
| P577-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.” |

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| <b>Response<br/>P578</b> | <b>Shoemaker, Dorea<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P578-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| P578-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Response<br/>P579</b> | <b>Short, Jack<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| P579-1                   | The commenter’s support for the proposed Process is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Response<br/>P580</b> | <b>Shrock, Joel<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| P580-1                   | The commenter’s support for mountain biking is noted. See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P580-2                   | The commenter’s support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Response<br/>P581</b> | <b>Siddens, Marc<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P581-1                   | The commenter’s support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Response<br/>P582</b> | <b>Siebert, Tom<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P582-1                   | The commenter’s personal experience with multi-use trails and general opposition to the proposed Process is noted. Additionally, the commenter’s recommendation for a ban on bikes on trails and a 5 mph speed limit on fire roads is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |

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| <b>Response<br/>P583</b> | <b>Simmonds, Norman<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                        |
| P583-1                   | The commenter's opposition to mountain bikers using single track trails is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| <b>Response<br/>P584</b> | <b>Sinclair, Dash<br/>11/26/2012</b>                                                                                                                                                                                                                                                                                                                      |
| P584-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P585</b> | <b>Skilbeck, Paul<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                                                      |
| P585-1                   | The comment expresses support for multi-use trails and suggests that IMBA and other specialists be consulted during consideration of change-in-use evaluations. Future evaluations of change-in-use proposals will include public noticing and the Process includes consultation with user groups relevant to a proposal. See Response to Comment P3-1.   |
| P585-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                      |
| <b>Response<br/>P586</b> | <b>Smith, Alex<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                         |
| P586-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P587</b> | <b>Smith, Dave<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                         |
| P587-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                     |

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| <b>Response<br/>P588</b> | <b>Smith, Garrett<br/>11/16/2012</b>                                                                                 |
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| P588-1                   | See Response to Comment P3-1.                                                                                        |
| P588-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

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| <b>Response<br/>P589</b> | <b>Smith, T<br/>Unkown</b>                                                                                                                                                                                                                                              |
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| P589-1                   | Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses, Master Response 2, Comments Related to Safety On Multi-Use Trails, and Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. |
| P589-2                   | See Response to Comment P192-3.                                                                                                                                                                                                                                         |
| P589-3                   | See Response to Comment P192-4.                                                                                                                                                                                                                                         |
| P589-4                   | See Response to Comment P192-5.                                                                                                                                                                                                                                         |
| P589-5                   | See Response to Comment P192-6.                                                                                                                                                                                                                                         |

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| <b>Response<br/>P590</b> | <b>Smith, Zachary<br/>11/16/2012</b>                  |
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| P590-1                   | The commenter's support for mountain biking is noted. |

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| <b>Response<br/>P591</b> | <b>Smoke, Jordan<br/>11/18/2012</b>                   |
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| P591-1                   | The commenter's support for mountain biking is noted. |

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| <b>Response<br/>P592</b> | <b>Snead, Michael<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                              |
| P592-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                     |
| P592-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                                                                                                                                                                                              |
| <b>Response<br/>P593</b> | <b>Sollberger, Evan<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                |
| P593-1                   | The commenter’s support for mountain biking is noted. The commenter states that change in use could affect revenue. Economic considerations are not environmental issues within the scope of the Program EIR, and no further response can be provided.P593-2 See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.” |
| P593-3                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P594</b> | <b>Sommer, Barbara<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                 |
| P594-1                   | This Program EIR does not address specific roads or trails in any particular geographic location. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.         |
| <b>Response<br/>P595</b> | <b>Sooder, Mike<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                |
| P595-1                   | The commenter’s support for mountain biking is noted. This Program EIR does not address specific roads or trails in any particular geographic location.                                                                                                                                                                                                                           |
| <b>Response<br/>P596</b> | <b>Soroka, Emi<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                     |
| P596-1                   | Commenter addresses opinions on multi-use and sign-use trails. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master                                                                                                                                                                                                      |

Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. Finally, not all trails within the CSP system would be converted to multi-use.

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| <b>Response<br/>P597</b> | <b>Soroka, Mari<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P597-1                   | The commenter's opposition to multiple uses on single tract trails is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. This Program EIR does not address specific roads or trails in any particular geographic location or park. Finally, not all trails within the CSP system will be converted to multi-use. |
| <b>Response<br/>P598</b> | <b>Soto, Roxanne<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P598-1                   | The commenter's support for mountain biking and conservation is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Response<br/>P599</b> | <b>Spier, R.<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P599-1                   | Although this PEIR does not address specific roads or trails in any particular geographic location or park, the commenter's opposition to mountain biking on equestrian trails is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                                             |
| <b>Response<br/>P600</b> | <b>Sprance, Jill<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| P600-1                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Response<br/>P601</b> | <b>St. Germain, David<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| P601-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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| <b>Response<br/>P602</b> | <b>Stafford, Jesse<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                           |
| P602-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                           |
| <b>Response<br/>P603</b> | <b>Starr, Kevin<br/>11/18/2012</b>                                                                                                                                                                                                                                                                                              |
| P603-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                   |
| P603-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                            |
| <b>Response<br/>P604</b> | <b>Stepper, Dean<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                             |
| P604-1                   | The commenter's support for mountain biking is noted. Comment suggests opening trails in Orange County. This Program EIR is not intended to address specific roads or trails, or specific uses within a particular geographic location. Requests for changes in use should be conveyed to the appropriate District personnel.   |
| <b>Response<br/>P605</b> | <b>Sterental, Rene<br/>11/19/2012</b>                                                                                                                                                                                                                                                                                           |
| P605-1                   | The commenter's support for mountain biking is noted. Please see Responses to Comments P3-1.                                                                                                                                                                                                                                    |
| <b>Response<br/>P606</b> | <b>Sterling, Elana<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                           |
| P606-1                   | The commenter's opposition to mountain biking is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |

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| <b>Response<br/>P607</b> | <b>Stewart, Cameron<br/>11/26/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| P607-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| P607-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P608</b> | <b>Stewart, Steve<br/>11/19/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| P608-1                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Response<br/>P609</b> | <b>Stokes, Jeff<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| P609-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Response<br/>P610</b> | <b>Stolarik, Sherrie<br/>10/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| P610-1                   | <p>The commenter's opposition to mountain biking is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.</p> <p>The commenter expresses the opinion that the Process would violate the 14<sup>th</sup> Amendment, because hikers' and bikers' safety could be compromised. The 14<sup>th</sup> Amendment of the U. S. Constitution is reproduced as follows:</p> <p><b>Section 1.</b><br/>All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.</p> <p><b>Section 2.</b><br/>Representatives shall be apportioned among the several States according to their respective numbers, counting the whole number of persons in each State, excluding</p> |

Indians not taxed. But when the right to vote at any election for the choice of electors for President and Vice-President of the United States, Representatives in Congress, the Executive and Judicial officers of a State, or the members of the Legislature thereof, is denied to any of the male inhabitants of such State, being twenty-one years of age,\* and citizens of the United States, or in any way abridged, except for participation in rebellion, or other crime, the basis of representation therein shall be reduced in the proportion which the number of such male citizens shall bear to the whole number of male citizens twenty-one years of age in such State.

**Section 3.**

No person shall be a Senator or Representative in Congress, or elector of President and Vice-President, or hold any office, civil or military, under the United States, or under any State, who, having previously taken an oath, as a member of Congress, or as an officer of the United States, or as a member of any State legislature, or as an executive or judicial officer of any State, to support the Constitution of the United States, shall have engaged in insurrection or rebellion against the same, or given aid or comfort to the enemies thereof. But Congress may by a vote of two-thirds of each House, remove such disability.

**Section 4.**

The validity of the public debt of the United States, authorized by law, including debts incurred for payment of pensions and bounties for services in suppressing insurrection or rebellion, shall not be questioned. But neither the United States nor any State shall assume or pay any debt or obligation incurred in aid of insurrection or rebellion against the United States, or any claim for the loss or emancipation of any slave; but all such debts, obligations and claims shall be held illegal and void.

**Section 5.**

The Congress shall have the power to enforce, by appropriate legislation, the provisions of this article.

It is not clear from the comment how the 14<sup>th</sup> Amendment applies to the Process or in what way it would be violated. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

| Response<br>P611 | Stone, Karen<br>Unkown                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| P611-1           | The commenter's opposition to mountain biking is noted. The commenter expresses concern related to negative effects on vegetation and soil. These issues are discussed in Impact 4.4-1, Construction-related disturbance or removal of special-status plant species, Impact 4.4-2, Construction-related disturbance or loss of sensitive habitats (Jurisdictional Wetlands, Riparian Habitat, and Other Special-Status Natural Communities), and Impact 4.7-2, Erosion and loss of top soil. While the comment refers to studies, no citation or references are provided and therefore no response can be provided. |

Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.

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| <b>Response<br/>P612</b> | <b>Storne, Eric<br/>11/16/2012</b>                                                                                               |
| P612-1                   | The commenter's support for mountain biking is noted.                                                                            |
| <b>Response<br/>P613</b> | <b>Strnad, Jason<br/>11/13/2012</b>                                                                                              |
| P613-1                   | The commenter's support for the proposed Process is noted.                                                                       |
| <b>Response<br/>P614</b> | <b>Stroll, Ted<br/>11/17/2012</b>                                                                                                |
| P614-1                   | The comment is noted.                                                                                                            |
| P614-2                   | Please see Response to Comment P3-1.                                                                                             |
| P614-3                   | Please refer to Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P615</b> | <b>Stroll, Ted (Rompcore Group)<br/>11/13/2012</b>                                                                               |
| P615-1                   | See Response to Comments letter P614.                                                                                            |
| <b>Response<br/>P616</b> | <b>Sturm, Alan<br/>11/17/2012</b>                                                                                                |
| P616-1                   | See Response to Comment P3-1.                                                                                                    |
| P616-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."             |

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| <b>Response<br/>P617</b> | <b>Sulecki, Johnny<br/>11/27/2012</b>                                                                                |
| P617-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P618</b> | <b>Sumida, Kevin<br/>11/27/2012</b>                                                                                  |
| P618-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P619</b> | <b>Swinkey, Lauren<br/>11/18/2012</b>                                                                                |
| P619-1                   | See Response to Comment P3-1.                                                                                        |
| P619-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P620</b> | <b>Switzer, Tom<br/>11/30/2012</b>                                                                                   |
| P620-1                   | See Response to Comment P3-1.                                                                                        |
| P620-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P621</b> | <b>Sylveser, Paul<br/>11/27/2012</b>                                                                                 |
| P621-1                   | See Response to Comment P3-1.                                                                                        |
| P621-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

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| <b>Response<br/>P622</b> | <b>Taggart, Grant<br/>11/17/2012</b>                                                                                                                                                                                               |
| P622-1                   | The commenter's support for mountain biking is noted. However, this PEIR does not itself open any specific roads or trails to new user types.                                                                                      |
| <b>Response<br/>P623</b> | <b>Taylor, Travis<br/>12/04/2012</b>                                                                                                                                                                                               |
| P623-1                   | The commenter's support for the proposed Process is noted.                                                                                                                                                                         |
| P623-2                   | The Trail Handbook is being reviewed and revised by CSP. A final version of a revised handbook is not scheduled to be completed prior to CSP's decision about the proposed Process. Please also refer to response to comment O4-9. |
| <b>Response<br/>P624</b> | <b>Tennessee, Peter<br/>11/16/2012</b>                                                                                                                                                                                             |
| P624-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                              |
| <b>Response<br/>P625</b> | <b>Terry, Julie<br/>11/28/2012</b>                                                                                                                                                                                                 |
| P625-1                   | See Master Response 1, Clarification Related to the Purpose and Intent of the Program EIR.                                                                                                                                         |
| <b>Response<br/>P626</b> | <b>Thanassi, Mark<br/>11/16/2012</b>                                                                                                                                                                                               |
| P626-1                   | See Response to Comment P3-1.                                                                                                                                                                                                      |
| P626-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                               |

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| <b>Response<br/>P627</b> | <b>Thelen, Nick<br/>11/16/2012</b>                                                                                   |
| P627-1                   | See Response to Comment P3-1.                                                                                        |
| P627-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P628</b> | <b>Therault, Thomas<br/>11/16/2012</b>                                                                               |
| P628-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P629</b> | <b>Therault, Thomas<br/>11/16/2012</b>                                                                               |
| P629-1                   | The commenter's support for mountain biking is noted. Please see Response to Comment P3-1.                           |
| <b>Response<br/>P630</b> | <b>Thomas, Eric<br/>11/16/2012</b>                                                                                   |
| P630-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P631</b> | <b>Thomas, Jim<br/>11/26/2012</b>                                                                                    |
| P631-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P632</b> | <b>Thompson, Aaron<br/>11/28/2012</b>                                                                                |
| P632-1                   | The commenter's support for the proposed Process is noted.                                                           |

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| <b>Response<br/>P633</b> | <b>Thompson, John<br/>11/16/2012</b>                                                        |
| P633-1                   | The commenter's support for mountain biking is noted.                                       |
| <b>Response<br/>P634</b> | <b>Thompson, Michael<br/>12/03/2012</b>                                                     |
| P634-1                   | The commenter's support for mountain biking is noted.                                       |
| <b>Response<br/>P635</b> | <b>Tilley, Anthony<br/>11/27/2012</b>                                                       |
| P635-1                   | The commenter's support for mountain biking is noted.                                       |
| <b>Response<br/>P636</b> | <b>Tinio, Norman<br/>11/29/2012</b>                                                         |
| P636-1                   | This Program EIR does not itself open any specific roads or trails to new user types.       |
| <b>Response<br/>P637</b> | <b>Todd, Matt<br/>11/26/2012</b>                                                            |
| P637-1                   | The commenter's support for mountain biking is noted.                                       |
| <b>Response<br/>P638</b> | <b>Tonnissen, Josh<br/>11/17/2012</b>                                                       |
| P638-1                   | See Master Response 3, Comments Related to Trail Design to Accommodate New Recreation Uses. |

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| <b>Response<br/>P639</b> | <b>Toutges, Wayne<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| P639-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P639-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Response<br/>P640</b> | <b>Tresun, Rob<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P640-1                   | Specific projects are not addressed in the Program EIR. Additionally, Griffith Park is owned and operated by the City of Los Angeles Department of Parks and Recreation. The Program EIR applies only to park units owned and operated by the CSP. Comments regarding mountain bikes on trails in this park should be directed to that agency. The commenter's opposition to mountain biking is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| <b>Response<br/>P641</b> | <b>Trice, Joel<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P641-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P641-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Response<br/>P642</b> | <b>Turley, Tod<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| P642-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| P642-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| <b>Response<br/>P643</b> | <b>Turner, Dan<br/>11/17/2012</b>                                                                                                                                                                                                                         |
| P643-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                     |
| <b>Response<br/>P644</b> | <b>Udkow, Mike<br/>Unkown</b>                                                                                                                                                                                                                             |
| P644-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                     |
| <b>Response<br/>P645</b> | <b>Uekert, Ken<br/>11/16/2012</b>                                                                                                                                                                                                                         |
| P645-1                   | The commenter's support for mountain biking is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| <b>Response<br/>P646</b> | <b>Ulyattt, Mike<br/>Unkown</b>                                                                                                                                                                                                                           |
| P646-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                             |
| P646-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                      |
| <b>Response<br/>P647</b> | <b>Urbach, Doug<br/>11/18/2012</b>                                                                                                                                                                                                                        |
| P647-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                     |
| <b>Response<br/>P648</b> | <b>Valdez, Aaron<br/>11/16/2012</b>                                                                                                                                                                                                                       |
| P648-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                     |

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| <b>Response<br/>P649</b> | <b>Valentine, Scott<br/>11/19/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                    |
| P649-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P650</b> | <b>Valenzuela, Jacob<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                   |
| P650-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                             |
| P650-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                      |
| <b>Response<br/>P651</b> | <b>Valenzuela, Jacob<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                   |
| P651-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P652</b> | <b>Van Horn<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                            |
| P652-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Response<br/>P653</b> | <b>Vanderman, Mike<br/>11/26/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                     |
| P653-1                   | The commenter's opposition to mountain biking is noted. This Program EIR does not itself open any specific roads or trails to users other than those that are currently permitted. Stakeholder input will be solicited for road and trail changes-in-use projects that are proposed under the Process. Additionally, no trails would be paved as a result of the Process although some may have areas where rock armoring is appropriate. |
| P653-2                   | CSP has reviewed and considered the referenced Federal Court decision. The decision suggests only that Federal Agencies do have the right to limit access to trails on federal lands; it does not mandate prohibition of mountain bike access.                                                                                                                                                                                            |
| P653-3                   | The commenter references a webpage address that contains an article that reviews some of the literature assessing the impacts of mountain biking on wildlife and people. While the comment letter does not refer to a Section of the Draft Program EIR, only one resource was used to                                                                                                                                                     |

prepare both the commenter's article and the Draft Program EIR (see Chapter 10 of the Draft Program EIR): Thurston, Eden and Richard J. Reader, "Impacts of experimentally applied mountain biking and hiking on vegetation and soil of a deciduous forest." Environmental Management, Vol.27, No.3, 2001, pp.397-409. This resource, among various others, is referenced in Impact 4.4-5, Long-Term and Operational Effects on Common and Sensitive Biological Resources. This impact statement acknowledges uncertainty to biological resources that could result from trail use, and concludes a less-than-significant effect due to implementation of SPR, including Adaptive Use Management.

As described in Section 15064(f), "the decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency." Furthermore, as set forth in CEQA Guidelines Section 15064(f)(5), "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumption predicated upon facts, and expert opinion support by facts." Finally, Section 15151 of the CEQA Guidelines states that, "...An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." Therefore, the materials referenced in Section 4.4, Terrestrial Biological Resources and throughout the document, meet the requirements under CEQA to in determining the significance of the environmental effects caused by a project.

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**Response  
P654**

**Veblen, Raak  
10/15/2012**

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P654-1

The commenter's support for mountain biking is noted. The commenter's support for the proposed Process is noted.

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**Response  
P655**

**Vento, Frank  
11/28/2012**

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P655-1

The commenter's support for mountain biking is noted.

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**Response  
P656**

**Verdugo, Carlos  
11/30/2012**

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P656-1

The commenter's support for mountain biking is noted.

| Response<br>P657 | Vernon, Noel<br>Unkown                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| P657-1           | <p>The analysis in Section 4.6 of the Draft Program EIR provides a programmatic analysis of cultural resources that is adequate for purposes of this EIR. Additional, site-specific, cultural resources evaluation may be required for change-in-use proposals, if local conditions warrant it. The comment provides no specific information or evidence that the analysis presented in the Program EIR is inadequate, inaccurate, or inappropriate. Please also refer to response to comment A1-1.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| P657-2           | <p>The use of ‘restoration’ within Section 4.6, Cultural and Paleontological Resources of the Draft Program EIR, is used appropriately because the analysis in this section is exclusively cultural and paleontological analysis. In reference to the term ‘restoration’ used in Chapter 2, we assume the commenter meant Section 2.2, not 2.5.</p> <p>The sentence referenced in Section 2.2, page 2-2 of the Draft Program EIR, is as follows:</p> <p style="padding-left: 40px;">“but not limited to, aggregate surfacing, rock armoring, wooden boardwalks or puncheons and bridging; closure, decommissioning, and restoration of existing roads and trails.”</p> <p>Use of the term restoration in this instance applies to any type of restoration of the landscape and native habitats that may be needed for an individual change-in-use project.</p>                                                                                                                                                                                                 |
| P657-3           | <p>The commenter expects a discussion of historical resources in Section 4.2, Aesthetics and Views; however, Impact 4.6-1, Roads and Trails as Historical Resources discusses potential impacts to road and trail historical resources by the projects proposed under the change-in-use Process. Consideration of cultural and historical resources would also be completed as part of the Process for individual change-in-use proposals.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| P657-4           | <p>The comment is noted. For further clarification, the following revisions have been made in the Program EIR.</p> <p>Page 2-17 of the Draft Program EIR is revised as follows:</p> <p style="padding-left: 40px;"><b>Roads and Trails as Historical Resources.</b> Some individual roads<del> or,</del> trails, and related facilities are known to be significant historical resources. However, because change-in-use projects that qualify for approval under the Process would comply with the Secretary of the Interior’s Standards during design and construction pursuant to SPRs (CUL-8, CUL-13, CUL-14, GEN-3, and GEN-6), there would be no material impairment <u>to the integrity of the resource</u> or substantial adverse change in the significance of the existing roads or trails that qualify as historical resources. Potential impacts to road or trail historical resources by projects proposed under the change-in-use Process would be less than significant.</p> <p>Page 4.6-31 of the Draft Program EIR is revised as follows:</p> |

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**IMPACT 4.6-1** **Roads and Trails as Historical Resources.** Some individual roads ~~or~~, trails, and related facilities are known to be significant historical resources. However, because change-in-use projects that qualify for approval under the Process would comply with the Secretary of the Interior’s Standards during design and construction pursuant to SPRs (CUL-8, CUL-13, CUL-14, GEN-3, and GEN-6), there would be no material impairment to the integrity of the resource or substantial adverse change in the significance of the existing roads or trails that qualify as historical resources. Potential impacts to road or trail historical resources by projects proposed under the change-in-use Process would be **less than significant**.

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P657-5 The commenter’s request to add historic resources as an area of controversy is noted. The Program EIR includes an extensive analysis of potential historic resources issues in Section 4.6, Cultural and Paleontological Resources. Also, numerous SPRs are oriented to protecting cultural resources. SPRs require minimizing construction disturbance and avoidance of significant effects, including to cultural resources, as provided in SPR CUL-1 through CUL-14 (see pp. 3-29 through 3-31 of the Draft Program EIR). CSP recognizes the importance of protection of historic resources as part of its stewardship responsibilities.

P657-6 Change-in-use proposals involve minor modifications to existing roads or trails generally within the prism of an existing road or trail (i.e., the previously disturbed area, or in the immediate proximity, if a short realignment is needed for sustainability purposes. The projects would not include landscape-scale alterations that would be expected to result in significant effects to cultural landscapes. Nonetheless, the suggested additions to the SPRs would be consistent with CSP’s approach to stewardship of cultural resources and would increase the level of protection for resources. The following SPR is added to the proposed Process in response to the commenter’s suggestion:

CUL-15: Prior to the start of on-site construction work, the District will determine if the project is consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes (36 CFR Part 68). Any construction that could affect a cultural landscape will comply with the Secretary of the Interior’s Standards.

This addition is a clarification of how the Process would protect cultural resources and does not constitute “significant new information” that would require recirculation of the Draft Program EIR per CEQA Guidelines Section 15088.5.

P657-7 Please refer to response to comment P657-6.

P657-8 Please refer to response to comment P657-6.

P657-9 The commentary about the importance of cultural landscapes is noted. CSP agrees that these are important resources.

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| <b>Response<br/>P658</b> | <b>Vernon, Noel 2<br/>Unkown</b>                                                                                                                                                                        |
| P658-1                   | The commenter has submitted the Department of the Interior’s guidelines for the treatment of cultural landscapes. Reference to the guidelines is being added to the SPRs in response to comment P658-1. |
| <b>Response<br/>P659</b> | <b>Veyna, Arthur<br/>11/27/2012</b>                                                                                                                                                                     |
| P659-1                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                    |
| <b>Response<br/>P660</b> | <b>Violich, Julia<br/>11/18/2012</b>                                                                                                                                                                    |
| P660-1                   | See Response to Comment P3-1.                                                                                                                                                                           |
| P660-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing “Attractions in Themselves.”                                                                                    |
| <b>Response<br/>P661</b> | <b>Viscuso, Geno<br/>11/26/2012</b>                                                                                                                                                                     |
| P661-1                   | See Master Response 3, Comments Related to Trail Design to Accommodate New Recreation Uses.                                                                                                             |
| <b>Response<br/>P662</b> | <b>Von Eschen, Scott<br/>11/28/2012</b>                                                                                                                                                                 |
| P662-1                   | Please see Responses to Comments P3-1.                                                                                                                                                                  |
| <b>Response<br/>P663</b> | <b>Vreeke, Jim<br/>11/27/2012</b>                                                                                                                                                                       |
| P663-1                   | The commenter’s support for mountain biking is noted.                                                                                                                                                   |

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| <b>Response<br/>P664</b> | <b>Vye, Richard<br/>12/04/2012</b>                                                                                   |
| P664-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P665</b> | <b>Wagner, Robert<br/>11/29/2012</b>                                                                                 |
| P665-1                   | Please see Responses to Comments P3-1.                                                                               |
| <b>Response<br/>P666</b> | <b>Wahl, Scott<br/>11/19/2012</b>                                                                                    |
| P666-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P667</b> | <b>Waldren, William<br/>11/18/2012</b>                                                                               |
| P667-1                   | The commenter's support for mountain biking is noted.                                                                |
| <b>Response<br/>P668</b> | <b>Walker, Chris<br/>11/27/2012</b>                                                                                  |
| P668-1                   | See Response to Comment P3-1.                                                                                        |
| P668-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |
| <b>Response<br/>P669</b> | <b>Walker, Robert<br/>11/27/2012</b>                                                                                 |
| P669-1                   | The commenter's support for the proposed Process is noted.                                                           |

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| <b>Response<br/>P670</b> | <b>Walls, Alan<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                               |
| P670-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                   |
| P670-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                            |
| <b>Response<br/>P671</b> | <b>Walsh, Andrew<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                             |
| P671-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                           |
| <b>Response<br/>P672</b> | <b>Walz, Jerry<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                               |
| P672-1                   | The commenter's opposition to mountain biking is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| <b>Response<br/>P673</b> | <b>Ward, Penelope<br/>12/04/2012</b>                                                                                                                                                                                                                                                                                            |
| P673-1                   | The commenter's opposition to mountain biking is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| P673-2                   | The comment addresses a specific park. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                                                                                                                                                   |
| <b>Response<br/>P674</b> | <b>Ward, Vickie<br/>Unkown</b>                                                                                                                                                                                                                                                                                                  |
| P674-1                   | Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                         |

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| <b>Response<br/>P675</b> | <b>Wardenburg, Mike<br/>11/29/2012</b>                                                                                                                                                                                                                                                                                       |
| P675-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P676</b> | <b>Warren, Kanneth R<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                      |
| P676-1                   | Specific projects are not addressed in the Program EIR. Additionally, Redwood Regional Park is owned and operated by the East Bay Regional Park District. The Program EIR applies only to park units owned and operated by CSP. Comments regarding mountain bikes on trails in this park should be directed to the District. |
| <b>Response<br/>P677</b> | <b>Warriner, Sean<br/>11/16/2012</b>                                                                                                                                                                                                                                                                                         |
| P677-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P678</b> | <b>Watkins, Boyd<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                          |
| P678-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P679</b> | <b>Watson, Rebecca<br/>11/19/2012</b>                                                                                                                                                                                                                                                                                        |
| P679-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P680</b> | <b>Watts, T. Larry<br/>10/27/2012</b>                                                                                                                                                                                                                                                                                        |
| P680-1                   | Please refer to response to comment O1-6.                                                                                                                                                                                                                                                                                    |

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| <b>Response<br/>P681</b> | <b>Weber, Clark<br/>11/16/2012</b> |
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| P681-1 | The commenter's support for mountain biking is noted. |
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| <b>Response<br/>P682</b> | <b>Webster, Eric<br/>11/17/2012</b> |
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| P682-1 | The commenter's support for mountain biking is noted. |
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| <b>Response<br/>P683</b> | <b>Weihe, Orion<br/>12/04/2012</b> |
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| P683-1 | See Response to Comment P3-1.                                                                                        |
| P683-2 | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

  

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| <b>Response<br/>P684</b> | <b>Weis, Matt<br/>11/17/2012</b> |
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| P684-1 | See Response to Comment P3-1.                                                                                        |
| P684-2 | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

  

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| <b>Response<br/>P685</b> | <b>Weiss, Anne<br/>12/01/2012</b> |
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| P685-1 | See Response to Comment P3-1.                                                                                        |
| P685-2 | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves." |

| <b>Response<br/>P686</b> | <b>Welling, Jeannette<br/>11/07/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| P686-1                   | Comment debates the behavior of trail user types, and relates issues to finances and safety. These are not environmental impact issues. See Master Response 2, Comments Related to Safety On Multi-Use Trails, Response to Comments P12-1, and Chapter 8 of the Draft Program EIR, Trail Use Conflicts. Additionally, the use of a trail by any type of user requires maintenance. The goal of the Process is make more objective and consistent the evaluation process for proposed change-in-use projects.                                                                                    |
| <b>Response<br/>P687</b> | <b>West, Lawrence<br/>11/17/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| P687-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| P687-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Response<br/>P688</b> | <b>White, Barbara<br/>11/20/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| P688-1                   | The comment provides introductory information and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.                                                                                                                                                                                                                                                                                                                                                                            |
| P688-2                   | Please refer to Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P688-3                   | CSP would consider the displacement of users and coordinate with agencies with facilities near change-in-use proposal to confirm adequate capacity at other nearby trails and the level of displacement would not be substantial over the long-term. In addition, experience at park units has shown that as the novelty of a new use added to a road or trail diminishes, the attraction of additional users would be expected to normalize and the potential for user displacement would diminish. Please see Impact 4.14-1, Indirect adverse effects to existing, off-site trail facilities. |
| P688-4                   | The comment addresses the Western States Trail. Specific projects are not addressed in the Program EIR. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR.                                                                                                                                                                                                                                                                                                                                                                                  |

| <b>Response<br/>P689</b> | <b>Williams, Donna<br/>12/03/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| P689-1                   | The commenter quotes a section of a Federal Energy Regulatory Commission Order that relates to the Department of Water Resources' recreation plan for its 762-megawatt Feather River Project No. 2100 in Butte County, California. This order was issued in January 2005, and as no bearing on the issues discussed in the Program EIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| P689-2                   | The commenter expresses concerns related to budgeting and suggests the promotion of public involvement, finances, and privatization; provides suggestions related to trail development; and, encourages a reduction in CEQA and NEPA time lines. For projects that are within the scope of the Program EIR or for which the Program EIR adequately covers most potential environmental impacts, the proposed Process would streamline the CEQA review of change-in-use projects. As described in Section 1.2 of the Draft Program EIR, Use of a Program Environmental Impact Report, later activities that are consistent with the Process (i.e., qualifying change-un-use projects within units of the State Park System) would be examined in light of the information in the Program EIR to determine whether an additional environmental document must be prepared. The Process is not a "one size fits all" solution. Rather, it may be applicable to some proposed projects. The specificities of individual future trail design, changes in user types, and budgeting and other financial issues would be considered on a case-by-case basis. If a later activity would have effects that were not examined in the Program EIR, an initial study would need to be prepared to determine the appropriate environmental document. Further, any project-specific impacts that are too speculative to define at the program level would be resolved during CEQA review of individual projects. Economic issues and NEPA compliance are not subject to the CEQA Statutes and Guidelines. |
| P689-3                   | The commenter provides photographs of various user types and their behaviors, but makes no comment on the environmental analysis in the Draft Program EIR. The photographs are noted. No further response is required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| P689-4                   | The comment does not address the adequacy or accuracy of the Draft Program EIR. See Master Response 1, Clarification Related to the Purpose and Intent of this Program EIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Response<br/>P690</b> | <b>Williams, Fred<br/>11/28/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P690-1                   | Please see Response to Comment P3-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| <b>Response<br/>P691</b> | <b>Williams, Megan<br/>Unkown</b>                                                                                                                                                                                                                                                                                                                                                                                                                            |
| P691-1                   | Commenter expresses opposition to multi-use trail in Topanga State Park and expresses concern with safety and design issues. Specific projects are not addressed in the Program EIR. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR, Master Response 2, Comments Related to Safety on Multi-Use Trails, and Master Response 3, Comments Related to Trail Design to Accommodate New Recreational Uses. |
| <b>Response<br/>P692</b> | <b>Wintermute, Paul<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P692-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P693</b> | <b>Wood, Rose<br/>11/26/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                             |
| P693-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P694</b> | <b>Woods, Patrick<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                         |
| P694-1                   | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Response<br/>P695</b> | <b>Woodward, Yvette<br/>11/27/2012</b>                                                                                                                                                                                                                                                                                                                                                                                                                       |
| P695-1                   | See Master Response 3, Comments Related to Trail Design to Accommodate New Recreation Uses.                                                                                                                                                                                                                                                                                                                                                                  |

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| <b>Response<br/>P696</b> | <b>Wyatt, Chris<br/>11/27/2012</b>                                                                                                                                                                                                                     |
| P696-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                          |
| P696-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                   |
| <b>Response<br/>P697</b> | <b>Wyler, Roland<br/>11/27/2012</b>                                                                                                                                                                                                                    |
| P697-1                   | Comment states that multi-use trails are generally in better shape than single-use trails. This comment is noted.                                                                                                                                      |
| <b>Response<br/>P698</b> | <b>Yates, Robert<br/>11/16/2012</b>                                                                                                                                                                                                                    |
| P698-1                   | The commenter's support for mountain biking is noted. The commenter states that change in use could affect revenue. Economic considerations are not environmental issues within the scope of the Program EIR, and no further response can be provided. |
| <b>Response<br/>P699</b> | <b>Zapack, Zenon<br/>11/16/2012</b>                                                                                                                                                                                                                    |
| P699-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                          |
| P699-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                   |
| <b>Response<br/>P700</b> | <b>Ziegler, Michael<br/>11/27/2012</b>                                                                                                                                                                                                                 |
| P700-1                   | See Response to Comment P3-1.                                                                                                                                                                                                                          |
| P700-2                   | See Master Response 4, Comments Related to PRC Section 5019.53 and Limits on Developing "Attractions in Themselves."                                                                                                                                   |

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| <b>Response<br/>P701</b>           | <b>Zimmerman, Helene<br/>Unkown</b>                                                                                                                                                                                                                                             |
| P701-1                             | The Commenter expresses opposition to new multi-use trails in the Santa Monica Mountains. Specific projects are not addressed in the Program EIR. This comment is noted. Please refer to Master Response 1, Clarification Related to The Purpose and Intent of the Program EIR. |
| <b>Response<br/>P702</b>           | <b>Zwissler, Robert<br/>11/28/2012</b>                                                                                                                                                                                                                                          |
| P702-1                             | The commenter's support for mountain biking is noted.                                                                                                                                                                                                                           |
| <b>Response<br/>P703-<br/>P744</b> | <b>Blank Responses</b>                                                                                                                                                                                                                                                          |
| P703-P744                          | No comment was provided in Comments P703 through P744. The receipt of these comments is noted for the administrative record.                                                                                                                                                    |

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# 3 REVISIONS AND CORRECTIONS TO THE DRAFT PROGRAM EIR

## 3.1 INTRODUCTION

This chapter includes revisions to the text in the Draft Program EIR following its publication and circulation for public review. The changes are presented in the order they appear in the original Draft Program EIR and are identified by page number, where relevant. The changes shown in this chapter originate either from comments received on the Draft Program EIR that resulted in text modifications or corrections or from modifications included by CSP staff that occurred after circulation of the Draft Program EIR for public review. Modifications to the Draft Program EIR that were made in response to comments are summarized separately in Chapter 2 of this Final Program EIR.

The Draft Program EIR modifications do not result in new significant effects or substantial increases in previously identified significant effects, so there is no need to recirculate the Program EIR for additional public review. Revisions shown as excerpts from the Draft Program EIR text include strikethrough (~~strikethrough~~) text for deletions and double underline (underline) text for additions.

## 3.2 DRAFT PROGRAM EIR REVISIONS AND CORRECTIONS

### 4.2.1 EDITORIAL CORRECTIONS, CLARIFICATIONS, AND REVISIONS

#### TEXT CHANGES BY CHAPTER OR SECTION AND PAGE NUMBER

##### CHAPTER 2-EXECUTIVE SUMMARY

*Page 2-2 of the Draft Program EIR is revised as follows:*

“but not limited to, aggregate surfacing, rock armoring, wooden boardwalks or puncheons and bridging; closure, decommissioning, and restoration of existing roads and trails”

Use of the term restoration in this instance applies to any type of restoration of the landscape and native habitats that may be needed for an individual change-in-use project.

*Page 2-17 of the Draft Program EIR is revised as follows:*

**Roads and Trails as Historical Resources.** Some individual roads ~~or~~, trails, and related facilities are known to be significant historical resources. However, because change-in-use projects that qualify for approval under the Process would comply with the Secretary of the Interior’s Standards during design and construction pursuant to SPRs (CUL-8, CUL-13, CUL-14, GEN-3, and GEN-6), there would be no material impairment to the integrity of the resource or substantial adverse change in the significance of the existing roads or trails that qualify as historical resources. Potential impacts to road or trail historical resources by projects proposed under the change-in-use Process would be less than significant.

## CHAPTER 3 – PROJECT DESCRIPTION

### ***Page 3-14 and 3-15 of the Draft Program EIR is revised as follows:***

Qualified CSP staff would inspect the route and associated use areas that are affected by a change-in-use proposal at least semi-annually during the first ~~five~~ three years following implementation of the change in use and would prepare an Adaptive Management Report (AMR) at the end of each year regarding achievement of the performance standards established for the project, consistent with CSP DOM 0313.1.1.5. The AMR would be available for public review at the District Headquarters. The report would include the results of observations of use and resource conditions noted for the performance standards, any degradation that exceeds the performance standard and response or remedial actions recommended to resolve the issue. A follow-up inspection would occur within three months following implementation of the remedial action to assess the effectiveness of any required remedies. If after re-inspection, park staff determine the remedy to be effective, no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent's Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result of the AUM process, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded during the ~~five~~ three years following implementation.

~~Between three and five~~ For up to five years after implementation of a change-in-use proposal, qualified CSP staff would inspect the route and associated use areas that are affected by the proposal at least semi-annually and would prepare an AMR at the end of each year regarding achievement of the performance standards established for the project. The AMR would be available for public review at the District Headquarters. The report would include the results of observations of use and resource conditions noted for the performance standards ("Condition Assessment"), any degradation that exceeds the performance standard and response or remedial actions recommended to resolve the issue is implemented. The follow-up inspection would occur within six months to assess the effectiveness of any required remedies. If after re-inspection, park staff determines the remedy to be effective, no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent's Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded for a sufficient time to allow incorporation of the road or trail with its changed use into the routine, long-term resources management activities of the park.

### ***Page 3-16 of the Draft Program EIR is revised as follows:***

If a change-in-use proposal does not qualify for approval using the Process, it would require its own, independent CEQA document. This may occur because the proposal exceeds the limits of the project actions covered by the Process, as listed above in Section 3.5, Project Actions Covered By and Excluded from the Process. Also, a change-in-use proposal may result in an unavoidable, significant environmental impact or a potentially mitigable significant effect that required detailed investigation or mitigation planning to reduce the effect to a less-than-significant level. An otherwise qualifying change-in-use proposal that results in significant unavoidable effects or mitigable significant effects requiring detailed investigations or mitigation planning may begin its review using the Process, but will need to depart the Process on an "off ramp" to its independent CEQA document. In these cases, the information in the Program EIR may be cited or incorporated as evidence to support impact analysis or mitigation approaches in an independent CEQA document.

Projects pursued through the Process would be subject to other applicable environmental laws and regulations. As CSP moves to comply with laws other than CEQA that require public notice on later activities, they may also reference this Program EIR, stating that the new action is within the scope of this Program EIR, and that it adequately describes the activity for CEQA purposes. Through the PEF process, CSP will ensure that any new actions comply with the permit, consultation, and application requirements of agencies with jurisdiction. Depending on where the actions are planned to occur, these could include:

- ▲ Coastal Development Permit from the California Coastal Commission,
- ▲ Bay fill or shoreline band development permit from the Bay Conservation and Development Commission,
- ▲ Streambed Alteration Agreement from the Department of Fish and Game,
- ▲ Development permits from the Tahoe Regional Planning Agency,
- ▲ State and Federal Endangered Species Consultation,
- ▲ Section 404 permit from the U.S. Army Corps of Engineers,
- ▲ Permit for work within the jurisdiction of the Central Valley Flood Protection Board,
- ▲ Section 401 Water Quality Certification from the Regional Water Quality Control Board,
- ▲ National Pollutant Discharge Elimination System (NPDES) from the Regional Water Quality Control Board, and
- ▲ Cultural resource approval.

Any necessary permits or requirements' of the Board would be identified through preparation of the CSP Project Evaluation Form (PEF) which reviews and assesses the potential resource impacts as a result of modifications and prepares appropriate CEQA documentation consistent with the Program EIR. Given the programmatic scope of the EIR for a statewide Process, discussion regarding the specific modifications needed for compliance with all potentially applicable environmental laws and regulations that may apply to a project cannot be covered under this Program EIR. Please also refer to Standard Project Requirements (SPRs) BIO-13 through BIO-28 which specifically highlights vegetation measures.

***Page 3-31 is modified to include the following SPR:***

**CUL-15:** Prior to the start of on-site construction work, the District will determine if the project is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes (36 CFR Part 68). Any construction that could affect a cultural landscape will comply with the Secretary of the Interior's Standards.

## **SECTION 4.4 – TERRESTRIAL BIOLOGICAL RESOURCES**

***Page 4.4-41 of the Draft Program EIR is revised as follows:***

Qualified CSP staff would inspect the route and associated use areas that are affected by a change-in-use proposal at least semi-annually during the first ~~three~~ five years following implementation of the change in use and would prepare an Adaptive Management Report (AMR) at the end of each year regarding achievement of the performance standards established for the project, consistent with CSP DOM 0313.1.1.5. The AMR would be available for public review at the District Headquarters. The report would include the results of observations of use and resource conditions noted for the performance standards, any degradation that exceeds the performance standard, and response or remedial actions recommended to resolve the issue. A follow-up inspection would occur within three months following implementation of the remedial action to assess the effectiveness of any required remedies. If after re-inspection, park staff determine the remedy to be effective,

no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent's Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result of the AUM process, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded during the ~~three~~ five years following implementation.

~~Between three and five~~ Five years after implementation of a change-in-use proposal, qualified CSP staff would inspect the route and associated use areas that are affected by the proposal at least semi-annually and would prepare an AMR at the end of each year regarding achievement of the performance standards established for the project. The AMR would be available for public review at the District Headquarters. The report would include the results of observations of use and resource conditions noted for the performance standards ("Condition Assessment"), any degradation that exceeds the performance standard and response or remedial actions recommended to resolve the issue is implemented. The follow-up inspection would occur within six months to assess the effectiveness of any required remedies. If after re-inspection, park staff determines the remedy to be effective, no further action would be required for that issue. If CSP staff is unable to remedy an identified issue, a Superintendent's Order would be used to immediately reduce user type, seasonally or permanently close the route, rescind the change in use temporarily or permanently, and/or any other action deemed necessary to protect the affected resource or use condition and maintain any adverse effect at a less-than-significant level. As a result, the prospect of significant adverse effects from increases in use or changes in use timing or pattern would be precluded for a sufficient time to allow incorporation of the road or trail with its changed use into the routine, long-term resources management activities of the park.

## SECTION 4.6-CULTURAL AND PALEONTOLOGICAL RESOURCES

*Page 4.6-30 is modified to include the following SPR:*

**CUL-15:** Prior to the start of on-site construction work, the District will determine if the project is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes (36 CFR Part 68). Any construction that could affect a cultural landscape will comply with the Secretary of the Interior's Standards.

*Page 4.6-31 of the Draft Program EIR is revised as follows:*

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**IMPACT 4.6-1** **Roads and Trails as Historical Resources.** Some individual roads ~~or~~, trails, and related facilities are known to be significant historical resources. However, because change-in-use projects that qualify for approval under the Process would comply with the Secretary of the Interior's Standards during design and construction pursuant to SPRs (CUL-8, CUL-13, CUL-14, GEN-3, and GEN-6), there would be no material impairment to the integrity of the resource or substantial adverse change in the significance of the existing roads or trails that qualify as historical resources. Potential impacts to road or trail historical resources by projects proposed under the change-in-use Process would be **less than significant**.

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## SECTION 4.7 – GEOLOGY, SOILS, AND MINERAL RESOURCES

*Page 4.7-27 of the Draft Program EIR is revised as follows:*

Environmental impacts are assessed by the significance criteria listed in Section 4.6.3, Significance Criteria. In some cases, multiple significance criteria are listed under each potential environmental impact. Each impact is

assessed and evaluated to determine whether significant environmental effects could be avoided based on the application of SPRs listed above. In addition to the implementation of SPRs, the Adaptive Use Management (AUM) process as described in Section 4.1, Programmatic Environmental Impact Analysis Approach, will provide additional assurance that impacts to geology and soils are maintained at less-than-significant levels. At the start of the Process, CSP staff will develop baseline and existing erosion geology and soil conditions of the existing road or trail proposed for changes in use and adjacent areas during the Change-In-Use Survey. Once baseline conditions are established, Project-Specific Requirements (PSRs) with performance standards will be developed for the proposed change-in-use project. These PSRs will be developed from CSP BMP documents, DOMs, and Trail Handbook guidelines with the goal to reduce impacts to geology and soils. CSP staff will monitor the trail and affected areas over a period of ~~three~~ five years for effects associated with elevated use, change-in-user types, trail design performance, and any lasting effects from trail design and construction activities. If the trail affected by the change-in-use proposal exhibits geologic instabilities or soil erosion at significant levels, CSP staff will develop a mitigation plan to reduce the effects to less than significant. If mitigation efforts could not reduce the environmental effects, then a Superintendent's Order may be necessary to rescind or change the conditions of the change in use.

## SECTION 4.10 – HYDROLOGY, WATER QUALITY, AND SEDIMENTATION

*Page 4.10-24 of the Draft Program EIR is revised as follows:*

At the start of the proposed Process, CSP staff will develop baseline hydrologic, water quality, and potential and existing erosion conditions of the road or trail proposed for change in use and adjacent areas during the Survey. Once baseline conditions are established, specific project-related performance standards will be developed for the proposed change in use. These performance standards will be developed from CSP BMP documents, DOM's, and Trail Handbook guidelines with the goal to reduce erosion and sedimentation, maintain and preserve natural hydraulic flow patterns, and maintain high water quality. CSP staff will monitor the trail and affected areas over a period of ~~three~~ five years for effects associated with elevated use, change in user types, trail design performance, and any lasting effects from trail design and construction activities. If the trail affected by the change-in-use proposal exhibits erosion and sedimentation at significant levels, disrupted hydraulic flow patterns, or degraded water quality, CSP staff will develop a remediation plan to address the issue. If remediation efforts fail to resolve the issue, then a Superintendent's Order may be necessary to rescind or change the conditions of the change in use.

## SECTION 4.14 – RECREATION

*Page 4.14-4 of the Draft Program EIR is revised as follow:*

Attractions in themselves can have the following impacts:

- ▲ Reduce parkland available for resource-based outdoor recreational uses;
- ▲ Displace park users;
- ▲ Reduce the options and area for development of park facilities;
- ▲ Reduce the unit's sense of place;
- ▲ Reduce open space and habitat or restorable habitat acreage;
- ▲ Consume staff time for General Plan amendments, contracts and overseeing improvements; and
- ▲ Divert scarce resources away from necessary park facilities.

It is recognized that some park facilities either acquired or developed in the past may be considered to be attractions in themselves. These facilities typically have long-established use and enjoyment as such and may be valued features of the State Park System.” In some cases, these uses were present on the land when it was acquired by CSP.

***Page 4.14-7 of the Draft Program EIR is revised as follows:***

Although the potential for increased use would not be expected to result in significant environmental impacts, CSP recognizes that uncertainty exists. District personnel would use Adaptive Use Management (AUM), one of the SPRs described in Section 3.6.4 and 3.8 of this Program EIR, to prevent any potential significant environmental impacts from occurring as a result of an increase or other change in recreational use resulting from a change-in-use project. The strategy involves monitoring of the affected trail and associated use areas by qualified CSP staff semi-annually for the first five years after the change in use is implemented. An Adaptive Management Report would be prepared at the end of each year regarding achievement of the performance standards established for the project. Based on this, CSP would take action to remedy any resource degradation and avoid any significant adverse impacts that may potentially occur as a result of adding a use or increasing the level of trail use.

## **APPENDIX B**

***Appendix B has been modified to include a Notice of Preparation (NOP) comment letter submitted by the Concerned Off-Road Bicyclists Association, on November 30, 2010.***

See Volume 2 for a copy of the NOP comment letter provided after the comment letters on the Draft Program EIR submitted by Persons.

## 4 REFERENCES

Alta Planning + Design (Alta). 2011. Draft Trail Use Conflict Study, California State Parks Road and Trail Change-In-Use Evaluation Process. Prepared by Alta. October 2011, updated June 2012.

California State Parks. 2012 (October 5). *Draft Program Environmental Impact Report - Road and Trail Change-In-Use Evaluation Process*.

\_\_\_\_\_. 2011 (March). Department of Parks and Recreation Operations Manual 2600. Permissible Uses of Other Power Driven Mobility Devices.

\_\_\_\_\_. 2002 (June). California Recreational Trails Plan. Phase 1. Available:  
<http://www.parks.ca.gov/pages/1324/files/ca%20rec%20trails%20plan.pdf>. Accessed April 24, 2013.

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