

# **Trione-Annadel State Park Road and Trail Management Plan**

## **Responses to Comments on the Public Review Draft Trione- Annadel State Park Road and Trail Management Plan**



**Prepared by  
California State Parks Bay Area District  
PO Box 942896  
Sacramento, CA 94296  
Project Contact:  
Noelle Breitenbach  
trails@parks.ca.gov**

**With support from  
Ascent, Inc.  
455 Capitol Mall, Suite 300  
Sacramento, CA 95814**

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# RESPONSES TO COMMENTS

## 1. INTRODUCTION

The California Department of Parks and Recreation (State Parks) released the Trione-Annadel State Park (TASP) Public Review Draft Road and Trail Management Plan (RTMP) for public review from January 28, 2026 through February 27, 2026. During this time, the public and stakeholders had opportunities to provide feedback on the Public Review Draft RTMP at a public meeting on February 4, 2026, and through online platforms where they could provide comments directly in the document. The public and stakeholders were also welcome to email comments directly to State Parks at [trails@parks.ca.gov](mailto:trails@parks.ca.gov).

State Parks carefully considered the comments, identifying the need for revisions in the RTMP, where applicable, and is providing written responses to comments in this document. This response to comments document includes master responses that provide comprehensive responses to similar comments provided by multiple people or organizations (see Section 2, below). It also provides all comments and individual responses to all comments received (see Appendix A). The next steps in the planning process include incorporating additional refinements to the Draft RTMP and preparing an environmental document pursuant to the California Environmental Quality Act (CEQA). The environmental document and revised Draft RTMP are anticipated to be released together for review in late summer/fall 2026.

## 2. MASTER RESPONSES

During the public review period for the Draft RTMP, State Parks received multiple comments that addressed similar issues (see Appendix A, which includes the original comments organized by topic). State Parks prepared the master responses below to address the comments in an integrated and comprehensive manner. These master responses are provided below for the following topics:

1. General Support/Acknowledgment
2. E-Bikes
3. Equestrian Use
4. Bike-Optimized Zones
5. Bike-Optimized Trails and Features
6. Signage and Wayfinding
7. Environmental Conservation
8. Environmental Review and Implementation
9. Accessible Trails
10. Detection Technology
11. Non-System Routes
12. Park Access
13. Trail Connections Outside TASP
14. Trail Maintenance
15. Trail Use Designations
16. Trail-to-Road Conversion
17. Enforcement
18. Fee Structure

A cross-reference to the applicable master response is provided in response to individual comments, when relevant, in Appendix A.

## Master Response #1: General Support/ Acknowledgment

Master Response #1 applies to comments that expressed general support or opposition without recommending any specific changes to the RTMP, were related to topics outside of the scope of the RTMP or included introductory remarks. State Parks appreciates submittal of these comments. No additional response is required.

## Master Response #2: E-Bikes

Master Response #2 addresses comments related to e-bike use in TASP. There are currently no e-bikes allowed at TASP. The RTMP is intended to function as a programmatic, long-term visionary planning document. Its purpose is to provide general guidance for future project-specific planning, analysis, and implementation related to the park's road and trail network. The plan identifies potential management strategies and conceptual directions for the park. However, it does not establish or change park regulations or operational policies.

Policies governing the operation of e-bikes in units of the state park system are established at the departmental level. Specifically, e-bike use is addressed in Departmental Notice No. 2021-04, which outlines the current policy framework for e-bikes within State Parks.

Under this policy, no person may operate an e-bike within a unit of the state park system except on public roadways and in areas where use has been specifically authorized through a Superintendent's Order. A District Superintendent may also authorize temporary access for Class 1 e-bikes for research or demonstration purposes within a State Park unit classification, such as TASP. Allowance of all trail uses other than pedestrians, to include e-bikes, is designated through a Superintendent's Order per California Code of Regulation (CCR) 4360.

Changes to the e-bike designations at TASP would either come from a District Superintendent's Order or through overall departmental policy change as approved at state park headquarters. This change is outside the scope of an RTMP.

Additional information regarding the State Parks e-bike policy can be found on the State Parks website at:

[https://www.parks.ca.gov/?page\\_id=30521](https://www.parks.ca.gov/?page_id=30521).

Other electric-powered modes of recreation that do not meet the definition of e-bikes—such as motor-driven cycles and electric motorcycles—are prohibited in all units of the state park system except state vehicular recreation areas (SVRAs). These types of vehicles are not covered under the Department's e-bike policy and therefore a District Superintendent cannot permit their use on TASP roads, trails, or lands.

## Master Response #3: Equestrian Use

Master Response #3 addresses comments that expressed concern that equestrian trails are not well represented in the park, comments requesting that existing equestrian access be retained, and some comments assert that horses have a high impact. The RTMP does not propose removing equestrian use from any trails within the existing trail system. Current equestrian access would remain available under the proposed plan.

In addition to maintaining existing opportunities, the RTMP proposes the development of many additional miles of multi-use trails that would be available to a variety of users, including equestrians. It is anticipated this will distribute all trail use over a larger trail network and thus reduce potential higher speed use conflicts with equestrians.

The plan also proposes a new hike/equestrian trail segment identified as Recommendation R-08, which would provide approximately 1.5 to 2 miles of new trail designed specifically for hiking and equestrian use. This recommendation is intended to expand trail opportunities and improve connectivity within the park's trail network.

To help improve safety and reduce potential conflicts between different trail users, the RTMP also recommends uphill directional use for bicycles along the Spring Creek Trail (Recommendation C-05). This recommendation is intended to help reduce user conflicts along the



popular travel route connecting Spring Lake Regional Park and Lake Ilsanjo, which experiences high levels of visitation from multiple user groups. Directional bicycle travel can help manage speed differentials and improve the overall experience for both hikers and equestrians.

Additionally, the plan proposes increasing opportunities for bike-optimized trails (Recommendations P-13, C-11, and R-06). It is anticipated that providing additional trails designed to provide improved mountain bike experiences will help distribute bicycle activity away from the park's shared multi-use trail system, particularly in the downhill direction. By expanding these bike-optimized opportunities, the plan is expected to reduce overall bicycle use on existing and proposed multi-use trails, thereby minimizing the potential for equestrian/bicycle conflicts along those routes.

With regards to comments asserting that equestrians have a high impact per user, the equestrian use in the park is very limited compared to other types of recreation uses and the plan would result in a minor increase in equestrian access (see discussion above pertaining to 1.5 to 2 miles of new trail for equestrian use). The environmental impacts of implementing all changes proposed by the RTMP will be assessed in compliance with CEQA through preparation of an Initial Study/Mitigated Negative Declaration (IS/MND) to determine the potential for any significant impacts associated with changes that could occur at the park with implementation of the RTMP, such as those related to equestrian access.

## **Master Response #4: Bike-Optimized Zones**

Master Response #4 addresses comments that expressed a desire for the RTMP to be used as a model for planning bike access at other recreation areas. A number of comments were received that expressed support for the bike-optimized zones proposed for the park in the RTMP and comments that expressed opposition to the bike-optimized zones, including adopting non-system trails in the park. California State Parks, like many public land

management agencies across California and the nation, is actively working to address the challenges posed by non-system (unauthorized) trail development. Unauthorized trails often emerge near urban and suburban communities where visitation is high and recreational demand is increasing. Because these routes are created without review, they can contribute to erosion, habitat disturbance, visitor safety concerns, and conflicts with established park management objectives. These trails are typically not planned or constructed to sustainable standards and may result in redundant or poorly placed routes that degrade natural and cultural resources.

One of the strategies used by some agencies to help reduce unauthorized trail creation is the incorporation of designated bike-optimized trail opportunities within the authorized trail system. When properly planned and constructed, these trails can meet recreational demand for mountain biking in a controlled, sustainable, or reasonably maintainable manner while reducing the incentive for riders to develop unauthorized routes. Bike-optimized trails are intentionally designed to meet environmental standards, minimize resource impacts, and provide safe and meaningful recreational experiences.

Within a State Park unit such as TASP, this type of planning requires careful balancing. The State Park classification mandates both the protection of significant natural and cultural resources and the provision of quality recreation—objectives that can sometimes be in tension. Throughout the RTMP process, State Parks worked to evaluate recreational needs, public input, and resource preservation requirements in a comprehensive and balanced way.

The bike-optimized zones identified in the RTMP were selected through a combination of public engagement, office-based analysis, and on-the-ground evaluation by park staff and resource specialists. These locations were chosen because they offer the best potential to provide desirable mountain-bike experiences while supporting long-term sustainability and protect park resources (see Figures 5-1, 5-2, 5-3, and 5-4 in Chapter 5, “Plan Recommendations”).

Importantly, the intent is not to reward or validate unauthorized trail construction. Instead, the recommended bike-optimized zones were identified based on environmental suitability, management feasibility, and alignment with park resource objectives. Although some non-system routes may overlap with areas that have potential for sustainable trail development, their existence did not dictate the selection process. Any proposed trails would still undergo appropriate planning, design, and environmental review prior to implementation.

Implementation of bike-optimized zones will occur incrementally. Early projects will help inform future decisions about whether—and where—additional opportunities may be appropriate. Success will be measured through indicators such as the absence of new non-system trail development, the closure and continued recovery of unauthorized routes, and feedback related to visitor experience and satisfaction. Ongoing monitoring and adaptive management will guide how bike-optimized opportunities evolve, and ultimately the long-term success of these areas will depend significantly on user behavior and stewardship.

Increasing bike-optimized opportunities is also expected to reduce bicycle use on multi-use trails, helping to minimize potential conflicts between cyclists, hikers, and equestrians. Concentrating bike use in designated areas can improve predictability and reduce pressure on trail corridors with other heavy use by user groups or sensitive resources.

It is important to clarify that the inclusion of bike-optimized experiences at TASP is not intended to establish precedent for all State Park units. Instead, it reflects a site-specific approach tailored to the unique conditions, opportunities, and constraints identified through the RTMP process. Lessons learned here—along with those from other agencies and pilot projects—will help inform future policy considerations, but each park will continue to be evaluated based on its own resource characteristics and management needs.

The zones identified in the plan represent the most suitable areas for providing bike-optimized

experiences while ensuring that resource protection remains central to park management. The plan cannot meet every desired trail experience for all park users in every location, particularly given State Parks resource protection mandates. However, State Parks' intent, as reflected in the RTMP, is that the trails community and park staff will continue to collaborate to provide appropriate, sustainable recreational opportunities while preserving the natural and cultural resources for which this park was established.

Through shared stewardship and collective responsibility, the community can help ensure that both the recreational experiences and the protected resources of TASP endure for generations to come.

## Master Response #5: Bike-Optimized Trails and Features

Master Response #5 addresses comments received that included recommendations for the types of trail experiences and features to include in the RTMP and support for adopting non-system trails. State Parks carefully evaluates all proposed recreational opportunities to ensure they are compatible with our core mission: the protection of natural and cultural resources for current and future generations. While State Parks recognizes the growing interest in downhill and highly technical mountain biking trails, these types of facilities present significant management challenges within a State Park setting.

Downhill technical trail features typically require sustained steep grades, frequent braking zones, and engineered obstacles. These conditions are not environmentally sustainable in most park landscapes and often result in elevated levels of soil displacement, erosion, vegetation loss, and sedimentation into waterways. They also require intensive, ongoing maintenance to remain safe and operational, often exceeding what is feasible with existing staffing and resource levels at TASP.

In addition, this park unit is managed specifically under the state park classification, which prioritizes the protection of sensitive natural resources, cultural sites, and native habitats. This



classification limits the types of high-intensity recreational uses that can be developed, especially when they risk long-term resource impacts or conflict with the experiences of other trail users.

For these reasons, State Parks is not proposing downhill-specific or highly technical mountain bike trails in the RTMP. Instead, State Parks, in cooperation with trail partners, aims to provide sustainable or maintainable bike-optimized opportunities that balance recreation with resource stewardship and preserve the character and ecological integrity of the park (relevant recommendations in the RTMP include Recommendations P-02, P-04, P-11, P-12, P-14, and P-20).

Where appropriate, and only in locations where resource conditions can support them, bike-optimized zones could incorporate elements such as flow-style trail segments with banked turns, small to medium strategically placed drops, jumps, rock gardens, and other features that utilize natural materials already present in the park—such as logs, rocks, and existing terrain forms. Any consideration of such features would require careful planning to ensure they do not compromise natural or cultural resources and that ongoing stewardship commitments are feasible. While these types of features are generally not considered fully sustainable under typical State Parks trail standards, it is recognized that they may be maintainable over time with proper design and the dedicated support of trail partners.

State Parks currently provides many miles of multi-use trails where mountain bikes successfully coexist with hikers and in some cases equestrians, and there is no evidence indicating significant safety issues across the state parks trail system. We do recognize that situations where higher-speed uses, such as bicycles, interact with slower-moving pedestrians and equestrians require thoughtful management. These situations are most effectively addressed through a combination of user education, appropriate trail design, and enforcement of established rules (Recommendations P-11, P-13,

P-18, P-19, P-20, and P-24 and the recommendations for each planning zone).

Additionally, it is not the intent of State Parks to develop bicycling trails that would restrict hikers' access to natural areas and viewpoints. Visitors come to State Parks to enjoy a shared experience of public lands, and trail planning emphasizes inclusivity rather than user segregation. Those seeking a purposely built, bicycle-only park experience may find a more appropriate opportunity in dedicated bike parks or facilities designed specifically for that type of recreation.

It is also recognized that equestrian use in areas anticipated to experience high and concentrated levels of bicycling activity—such as designated bike-optimized zones—may pose specific safety concerns due to differences in speed, behavior, and the size of horses, and are therefore not likely to be compatible. Accordingly, the RTMP does not recommend equestrian use on bike-optimized trails.

Looking ahead, future implementation could include strategies to improve safety and user comfort where bike-optimized experiences are appropriate. These tools may include:

- Signage that clearly informs visitors when they are entering bike-optimized segments and reminds bicyclists to watch for pedestrians.
- Design options, such as optional lines or alternate routes, which allow bicyclists to engage with bike-optimized features while providing pedestrians with a more direct or less technical path.
- Directional trails where appropriate, reducing head-on conflicts and improving predictability for all users.

At this time, State Parks does not maintain a formalized difficulty rating system for mountain bike trails within the state park system. While some SVRAs do utilize difficulty ratings for motorized trails, those areas are specifically managed and designed to accommodate a wide spectrum of technical challenges and user skill levels associated with off-highway vehicle recreation.

In contrast, State Parks are managed with a broader resource protection and visitor experience mandate. Trails within State Parks, including those open to mountain biking, are planned and designed to be sustainable, maintainable, and appropriate for the surrounding environment. As a result, trail design standards inherently limit the degree of technical difficulty that can be developed and maintained over time. This management approach tends to produce a narrower range of trail difficulty compared to facilities such as bike parks or specialized recreation areas that are intentionally designed to offer highly varied and progressively challenging terrain.

Because of these factors, implementing a formal difficulty rating system similar to those used in ski areas or bike parks may not be appropriate in the state park context and could create a misleading or skewed perception of trail difficulty. That said, State Parks recognizes the value of clear visitor information and will continue to explore practical ways to communicate trail characteristics—such as surface type, grade, and typical conditions—to help users choose trails that align with their abilities and expectations.

### **Master Response #6: Signage and Wayfinding**

Master Response #6 addresses comments that recommended more trail etiquette, yield signs, wayfinding, and educational signage in the park. State Parks fully agrees that clear wayfinding and well-designed interpretive information are critical tools for helping visitors navigate responsibly, understand the significance of park resources, and ultimately support their protection. To address this need, the RTMP includes Recommendation P-24, which specifically calls for improved signage and interpretation throughout the park.

Wayfinding signs will play an essential role in distinguishing official system trails from non-system routes and is included in Recommendation P-11 in the plan. By helping visitors clearly identify authorized trails, signage can reduce unintentional non-system use and

help prevent the reoccupation of closed or restored areas. Likewise, interpretive information—whether provided through signs, kiosks, or other media—can help educate visitors about natural and cultural resources (Recommendation P-14), develop a deeper appreciation for their value, and reinforce the importance of staying on designated system trails. Additionally, signed trail rules and etiquette, and posted speed limits, can assist in reducing user conflict and potential safety issues.

Through these combined measures, State Parks aims to support visitor orientation, enhance understanding of sensitive resources, and promote the shared stewardship needed to protect the park for future generations.

### **Master Response #7: Environmental Conservation**

Master Response #7 addresses comments that expressed concern related to the need for environmental or resource protection in general, potential for spread of invasive plant species by recreation users, impacts on specific wildlife species, fragmentation of habitat, and other environmental concerns with implementation of the RTMP. The RTMP includes several key recommendations aimed at avoiding or reducing impacts to natural and cultural resources throughout the park (Recommendations P-05, P-14, C-04, C-06, C-11, R-03, and R-10). In addition to removing unsustainable non-system (unauthorized) trail routes that are causing erosion, habitat disturbance, and sedimentation into waterways—including those within sensitive wetland environments—the plan is also recommending road and trail designs for new trails and improvements to existing roads and trails to limit impacts on sensitive resources. These design measures include the use of drainage structures and trail-hardening techniques such as armored drain crossings, turnpikes, causeways, and boardwalks to minimize disturbance to waterways and wetlands intersected by roads and trails.

To further limit disturbance and habitat fragmentation, the plan also recommends



minimizing new system trails in the eastern portion of the park, which remains the least disturbed and least utilized area, thereby helping to preserve its ecological integrity and function as a relatively undisturbed habitat core.

At the same time, the plan recognizes that there are desired trail connections within this area. Where such connections can be achieved through sustainable reroutes or reengineering of existing alignments—and can avoid or minimize impacts to sensitive natural resources—they may be worthy of consideration. These types of opportunities are identified and recommended in the plan.

State Parks has also received several comments expressing a desire for an in-park trail connection between Lawndale and Schultz Trailheads. While State Parks understands this interest from a circulation and connectivity perspective and the concept was originally identified as a potential opportunity in Section 3.2, “Planning Opportunities and Constraints,” the concept was not advanced in the plan due to the challenges of identifying a sustainable trail alignment and the potential to contribute to additional habitat fragmentation in this portion of the park.

One of the goals of this plan is to reduce or eliminate unauthorized trail creation, or reoccupation after closure, by designating bike-optimized trail opportunities in areas of the park that present the least potential for impacts on significant resources. When properly planned and constructed, these trails can meet appropriate recreational demand for bicycling experiences in a controlled and sustainable manner, while reducing incentives for riders to develop informal routes in more sensitive locations. It is recognized that there is no guarantee of success with this approach, and therefore implementation of recommended road and trail additions and removals will occur incrementally. Early projects will help inform future decisions about whether—and where—additional opportunities may be appropriate.

Success will be evaluated through indicators such as the absence of new non-system trail development, the closure and continued recovery of unauthorized routes, and visitor feedback

related to experience and satisfaction. Ongoing monitoring and adaptive management will guide how bike-optimized opportunities evolve, and ultimately the long-term success of these areas will depend significantly on user behavior and stewardship.

## **Master Response #8: Environmental Review and Implementation**

Master Response #8 addresses comments requesting clarity around implementation of the RTMP, how projects will be prioritized for implementation, the level of environmental document that would be required, and future permitting needs. The purpose of the RTMP is to provide a comprehensive framework for long-term planning, design, construction, maintenance, and management of the road and trail system within the park. This long-range planning pathway extends over many years, during which the State’s budget—and therefore State Parks’ budget—will likely fluctuate. In addition, funding sources for project implementation may include grants, partner contributions, or donations, all of which are inherently difficult to forecast. As a result, funding availability for implementing specific RTMP recommendations is both unknown and unpredictable. If an RTMP were to base its recommendations solely on current or guaranteed funding, it would be unable to propose projects that require investment and would fail to provide the long-term vision needed to meet established goals and objectives.

Chapter 6, “Implementation,” provides a framework and process by which phasing and prioritization may occur; however, given the many unknowns associated with future conditions, the intent is not to constrain future decision-making by establishing a rigid phasing timeline. Instead, implementation will be determined based on project need, as identified by the Department with input from partners, stakeholders, and the public, along with funding availability. Accordingly, the implementation of plan recommendations should be viewed as a dynamic process guided by these criteria, rather than a linear or static sequence,

reflecting the evolving circumstances under which decisions will be made.

Comments have suggested that State Parks does not currently have the funding needed to operate and manage its existing facilities. While this is largely true, it is important to note that these operational shortfalls relate specifically to operations and maintenance funding allocated through the Department's annual budget. Although operational funding should be taken into account when considering implementation of RTMP recommendations, the recommendations themselves would likely rely on special project funding. This includes resources secured through the capital outlay process, donations, grants, or—when available—deferred maintenance funding. As a result, many of the proposed improvements are not expected to draw from the park's existing operational budget but could indirectly increase operational needs.

The environmental effects of the RTMP will be evaluated in accordance with CEQA through preparation of an Initial Study/Mitigated Negative Declaration (IS/MND). Because the RTMP provides program-level guidance and many of the site-specific details for individual projects are not yet known, the environmental analysis in the IS/MND will be completed at a programmatic level of detail consistent with the broad nature of the plan.

While the program-level environmental review will evaluate the overall effects of implementing the RTMP, some actions—particularly those involving new trail construction, new facilities, or conversion of non-system routes to system routes—will require additional project-level design and environmental review once more detailed information is available. These future project-specific analyses may “tier” from the RTMP environmental document, consistent with CEQA Guidelines Section 15152. Tiering allows a later project to rely on the broader analysis already completed for the RTMP, while focusing any subsequent review on the site-specific issues not addressed at the program level. A later project may be considered within the scope of the program-level IS/MND or IS/ND if its

environmental effects were evaluated in that document and if no new or more severe environmental impacts would occur. It is therefore anticipated that most projects to implement plan recommendations would be covered under a Notice of Exemption.

Other activities recommended in the RTMP—such as routine maintenance, reroutes within an existing trail prism, decommissioning and restoration of existing routes, or installation of signage and interpretive elements—will be fully evaluated in the RTMP IS/MND. When these activities fall within the scope of the programmatic analysis, no additional CEQA documentation will be required for future implementation. In some cases, maintenance activities or minor alterations to existing facilities may also qualify for a categorical exemption, regardless of their inclusion in the RTMP environmental document.

In summary, the RTMP environmental review will analyze the overall recommendations, and many routine or maintenance-level actions may be covered directly under this review. More complex or site-specific construction projects may require additional CEQA review in the future, but this review can be streamlined by tiering from the RTMP's program-level environmental document.

It is anticipated that the environmental document prepared for the RTMP will clarify, through its standard project requirements or mitigation measures, that consultation with appropriate regulatory agencies will be required based on the specific type of project being proposed and its potential impacts on natural resources. This includes, but is not limited to, potential effects on waterways, wetlands, and sensitive plant and animal habitats. As such, projects may require permits from applicable local, state, and federal agencies prior to implementation.

In addition, the standard requirements or mitigation measures will require consultation with Native American tribes, consistent with applicable state laws and policies, to ensure that tribal cultural resources and interests are appropriately considered during project planning and implementation.



Because the scope, location, and potential impacts of individual projects may vary, the specific permitting requirements and associated timelines will also vary. In general, permitting and consultation would occur during the project-specific planning and environmental review phase, following approval of the RTMP. Timelines for these processes depend on factors such as project complexity, the number of agencies involved, and the sensitivity of the affected resources.

Overall, the RTMP establishes a programmatic framework, and all future projects implemented under the plan will be required to comply with applicable permitting processes, environmental regulations, and consultation requirements prior to construction.

Further clarification of which activities are expected to be covered in the RTMP IS/MND—as well as those that may require additional future environmental review and monitoring—will be provided in Chapter 6 of the Proposed Draft RTMP and associated environmental document. That document will be made available for public review and comment, offering an opportunity for additional input before it is finalized.

## **Master Response #9: Accessible Trails**

Master Response #9 addresses comments requesting accessible trails in TASP. Providing recreational opportunities for visitors of all abilities is an important consideration of the plan.

Recommendations P-9 and P-10 address accessibility and are intended to guide the planning, design, and, where feasible, retrofitting of trails and related facilities in a manner consistent with applicable accessibility standards, environmental constraints, and resource protection objectives. In addition, the plan recommends improvements to Channel Trail (R-09) such as surfacing the trail with compacted and/or stabilized aggregate, reengineering the trail with adequate grades and landing areas, and providing rest areas with bench seating at appropriate intervals to provide a more accessible trail experience.

TASP presents inherent challenges to accessibility due to its steep terrain, multiple access points from the park and surrounding communities, generally in a steep uphill direction, and the absence of public roads connecting lower and higher elevations. These conditions limit the feasibility of providing easily accessible trail experiences and those meeting ADA requirements in many areas of the park.

All new trails and modifications to existing trails will address accessibility in accordance with relevant requirements of the Architectural Barriers Act (ABA) and State Parks accessibility guidelines, with the goal of maximizing accessibility to the extent practicable. Adaptive recreational planning and design approaches will also be considered to enhance recreational experiences for visitors with disabilities and will be implemented where feasible and appropriate. While not all trails will meet full accessibility standards, the RTMP prioritizes opportunities to provide accessible trail experiences where site conditions allow.

Additionally, recommended maintenance and trail improvements—such as surface stabilization and reengineering, drainage enhancements, and grade adjustments where feasible—will improve overall usability and accessibility for a broad range of visitors.

## **Master Response #10: Detection Technology**

Master Response #10 addresses comments requesting that monitoring technology not be used at the park. State Parks recognizes the importance of protecting park resources while ensuring that any management actions are implemented in a lawful, appropriate, and transparent manner (Recommendation P-19).

Unauthorized trail creation, modification, and related activities are prohibited under the California Code of Regulations (CCR), including CCR Sections 4306, 4307, and 4308, as applicable. These regulations, as well as others, are in place to protect natural and cultural resources, maintain public safety, and ensure that trail systems are developed and managed in a sustainable manner.

Given limited staff and enforcement resources, State Parks will consider the use of all lawful and appropriate methods to reduce illegal activities within the park. Any potential technologies under consideration would be used solely to detect patterns of unauthorized activity. Information gathered would be used to better inform law enforcement of areas where increased patrols or on-site observation may be warranted.

The intent of exploring these tools is not to expand enforcement beyond existing authorities, but to improve the efficiency and effectiveness of resource protection efforts. Any implementation would be consistent with applicable laws, regulations, and policies governing privacy and public land management.

Through this approach, State Parks seeks to deter illegal activities, protect sensitive resources, and support a safe and sustainable trail system for all park users.

## Master Response #11: Non-System Routes

Master Response #11 addresses comments received that included support and opposition for adopting non-system routes into the trail system. Non-system routes are generally routes that have been illegally developed or constructed, often in violation of CCR Sections 4306, 4307, and 4308, as applicable. State Parks does not currently, nor will it in the future, support or condone the unauthorized development or construction of these routes.

At the same time, it is recognized that non-system routes have developed over time for a variety of reasons, including unmet recreational demand, limited public awareness of regulations, and constraints on enforcement resources. The presence of these routes in the landscape is therefore acknowledged as a management challenge that requires thoughtful and balanced consideration.

The evaluation of non-system routes conducted at TASP and the resulting determinations to consider certain routes for either incorporation into the formal trail system or removal, should not be interpreted as establishing precedent for the

broader State Park system. Rather, this effort represents one of several approaches being explored by State Parks and other land management agencies to address the widespread and complex issue of unauthorized trail development.

Importantly, plan recommendations were not driven solely by the existence or use of non-system routes. Each route was systematically evaluated based on resource sensitivity and environmental sustainability, trail design and maintenance feasibility, and desired use experience. The mere existence or use of a non-system route did not guarantee its continuation, either in its current form or at all.

Through this evaluation process, routes were categorized to identify those that are unsustainable and should be removed and restored, and those that may be sustainable or maintainable with modifications (see Appendix 6 of the RTMP). Only those routes that meet the plan's overarching goals and recommendations would be incorporated into the designated trail system. Non-system routes determined for future inclusion as a system road or trail with modifications would be further evaluated on a project-specific level to ultimately determine if inclusion meets the RTMP goals as well as project-specific design criteria necessary to meet use desires and provide for sustainable or maintainable routes.

Several commenters requested that the area commonly referred to as "Manzanita"—generally located south of Channel Drive, west of Steve's "S" Trail, and east of the North Burma Trail—retain the existing non-system routes in that area. State Parks acknowledges that this area is popular with mountain bikers and provides riding experiences that many users find desirable.

As part of the RTMP process, the Manzanita area was thoroughly evaluated through both office-based analysis and multiple field assessments. This review determined that the area contains sensitive resources and terrain that is not conducive to sustainable or maintainable trail construction. Steep slopes, erosive soils, and existing drainage patterns make it difficult to



design or maintain trails without causing long-term erosion, sediment transport into watercourses, and other resource impacts. Existing informal routes already exhibit signs of substantial degradation, including direct impacts to watercourses and slope destabilization.

Given these conditions, it was not feasible to identify enough non-system route alignments within the Manzanita area that could meet sustainability standards or avoid significant impacts to park resources. Nor was it considered feasible to definitively develop new routes with significantly improved sustainability. For these reasons, the RTMP does not designate the Manzanita area as a bike-optimized zone and does not include these non-system routes as part of the future trail system.

Some comments also suggested that, regardless of designation, these and other non-system routes would continue to be used. State Parks has undertaken a thorough and deliberate planning process to balance sustainable recreational opportunities with the protection of natural and cultural resources, consistent with the mission of a state park. Not every desired experience can be accommodated in a single location such as TASP, and management decisions must reflect broader stewardship responsibilities.

Continued use of unauthorized routes, particularly with the intent of disregarding established rules and regulations, undermines these efforts and can lead to further resource damage and reduced sanctioned opportunities over time. State Parks remains committed to working collaboratively with staff, stakeholders, partners, and the public to provide high-quality, sustainable recreational opportunities while protecting the resources that make these parks unique.

## **Master Response #12: Park Access**

State Parks has received several comments regarding parking at the Schultz Trailhead. State Parks recognizes that access and parking are important considerations for visitors; however, parking at this location presents inherent challenges.

Shultz Road is a narrow roadway with limited capacity to safely accommodate roadside parking. Increased parking demand in this area can create safety concerns for both visitors and local residents, including restricted emergency access and reduced sight distances. In addition, Shultz Road is a county road, and State Parks does not have direct jurisdiction over its design or management.

Additionally, State Parks property does not extend to Shultz Road. Access to the trailhead relies on easements across non-State Park lands, which limits the ability of State Parks to develop, manage, or expand parking facilities in this area. Any improvements would require coordination with the County of Sonoma and underlying landowners and may be subject to the terms and limitations of those easements and rights-of-way.

The presence of nearby private residences further constrains parking opportunities. Increased visitor parking has the potential to affect neighborhood access and the perception of privacy for local residents.

Recommendation S-04 in the RTMP calls for coordinating with County of Sonoma to evaluate opportunities to improve parking and access in this location. If improvements are determined to be infeasible at the existing trailhead or if additional access is desired, the plan also identifies alternative access to the Schultz Zone under Recommendation S-05.

## **Master Response #13: Trail Connections Outside TASP**

Master Response #13 addresses comments that requested development of trail connections to nearby recreation resources. The RTMP addresses this topic through Recommendation P-03, which calls for coordination with regional land management agencies and organizations on planning and implementing regional trail connections through TASP as well as pursuing additional connections between TASP and adjacent lands where feasible.

State Parks recognizes the importance of regional connectivity and the value it provides for recreation, access, and resource stewardship.

However, it is important to note that State Parks does not typically plan or designate trails on lands that are not publicly owned without the permission and agreement of the respective landowners. While future opportunities such as land acquisitions, easements, or cooperative agreements may support expanded connections, such arrangements are not currently in place in some locations.

State Parks has identified adjacent and regional trail opportunities in the RTMP that were developed in coordination with, and are generally supported by, the respective landowners, and are consistent with existing easements and agreements where they occur. However, land ownership, easements, and agreements may change over time and continued coordination and collaboration with surrounding public agencies, private landowners, and regional partners will be critical to advancing desired local and regional trail connections.

## **Master Response #14: Trail Maintenance**

Master Response #14 addresses comments that provide general and specific requests for additional trail maintenance in the park. State Parks, including the Bay Area District and other districts statewide, operates with limited funding dedicated to road and trail maintenance. As a result, maintenance efforts are constrained by a lack of staff positions, specialized equipment, and materials necessary to support the level of cyclical or deferred maintenance required for long-term trail sustainability. Within the Bay Area District, a relatively small trails program is responsible for managing 16 parks and more than 275 miles of roads and trails. While this context is not intended as an excuse for maintenance deficiencies, it reflects an operational reality that is unlikely to change significantly in the foreseeable future.

State Parks remains committed to improving trail maintenance capacity within these constraints. Partnerships and volunteer agreements will play a critical role in supporting maintenance efforts, including at TASP (Recommendations P-02, P-04, and P-20). These collaborative efforts help extend

the reach of limited staff resources and contribute meaningfully to trail upkeep and sustainability when implemented in a responsible manner.

State Parks also acknowledges comments expressing concern that maintenance activities could “sanitize” trails by removing technically challenging features valued by some users, particularly cyclists. It is not the intent of State Parks to eliminate all technical or endurance-based challenges from trails that allow bicycling. However, many of the features referenced, such as fall-line alignments, constructed berms, or entrenched trail segments, are often inherently unsustainable and difficult to maintain. These conditions can lead to poor drainage, accelerated erosion, and increased long-term maintenance demands.

Accordingly, maintenance actions will focus on correcting unsustainable trail conditions to improve durability, safety, and environmental performance. At the same time, State Parks will seek to retain appropriate levels of technical challenge and rider experience where feasible and sustainable. The goal is to strike a balance between preserving valued recreational experiences and ensuring that trails remain maintainable and resilient over time.

## **Master Response #15: Trail Use Designations**

Master Response #15 addresses comments that provided requests for establishing use designations of specific trails. State Parks recognizes that trail use designations are among the most important and often most debated elements of the RTMP. State Parks appreciates the thoughtful input from cyclists, equestrians, and hikers regarding where specific uses should be allowed or limited.

The RTMP planning process has taken a comprehensive and balanced approach to identifying appropriate trail uses across the system. This included extensive field evaluations, visitor surveys, trail counts, environmental analysis, and consideration of public and staff input. A key objective of the RTMP is to provide a variety of sustainable and maintainable trail



experiences that accommodate different user preferences while protecting natural and cultural resources.

In response to comments from the bicycling community, the plan has gone to great lengths to identify and designate bike-optimized trail opportunities in locations that are suitable from both a sustainability/maintainability and user experience perspective. These trails are located and designed to support bicycling-specific features where appropriate, while minimizing environmental impacts and long-term maintenance challenges.

In addition, cyclists will be allowed on designated multi-use trails, which help provide important connectivity throughout the trail system and allow riders to reach desired destinations. However, it is important to clarify that these multi-use trails are not intended to include bike-optimized design elements, as they must safely and comfortably accommodate a wide range of users, including hikers and equestrians.

At the same time, the plan recognizes and responds to concerns from hikers and equestrians by maintaining and recommending trail experiences that are free from bicycle use, ensuring that visitors seeking quieter, lower-speed, or more traditional backcountry experiences have appropriate opportunities available.

State Parks also received several comments regarding Recommendation R-08, referred to by some commenters as “Rainforest.” This route is currently a non-system trail descending from South Burma Trail to Lake Ilsanjo and generally follows the alignment of a former system route known as Middle Steve’s Trail, although the existing user-created route likely differs from the historic alignment. The plan recommends designation of this route as hike/equestrian only. This designation is intended to provide hikers and equestrians with a bike-free experience through one of the unique landscapes in the park, offering an immersive opportunity to connect with the natural environment. It also supports the RTMP objective of providing a diverse range of trail experiences for visitors to choose from. Given the

broader set of recommendations that include extensive bike-optimized opportunities elsewhere in the system, this designation was determined to be appropriate. In addition, the route would provide valuable connectivity to Lake Ilsanjo, a popular destination for hikers and equestrians.

State Parks appreciates the feedback received regarding the proposal to limit cyclists to uphill-only travel on Spring Creek Trail. This concept has been carefully considered in response to both long-standing user experiences and input received during the RTMP process.

Over the years, State Parks has received multiple reports from trail users expressing safety concerns associated with fast-moving downhill cyclists on Spring Creek Trail. Similar concerns were also raised through public comments during the RTMP process. The trail’s popular shared-use nature can create conditions where speed differentials between users increase the potential for conflicts, particularly on downhill segments.

At the same time, State Parks recognizes that Spring Creek Trail is a highly valued route for a wide range of users, including cyclists. It is also acknowledged as providing a beginner- to intermediate-level descent experience, which is an important component of the overall trail system.

The proposed uphill-only designation for cyclists is intended to improve safety while maintaining quality riding opportunities. With the availability of alternative beginner- to intermediate-level descents—such as Canyon Trail, as well as future opportunities identified under Recommendation C-09, and planned improvements to the lower section of Rough Go Trail under Recommendation C-03—cyclists would continue to have access to a wide range of downhill riding options within the park.

Importantly, implementation of this recommendation would further consider existing conditions and other RTMP recommendations to ensure that a sufficient range of alternative riding opportunities are in place prior to any change, designating Spring Creek Trail as uphill-only for cyclists (Recommendation C-05). The goal is to balance user experience with safety

considerations, while maintaining a diverse and sustainable trail system for all visitors.

Ultimately, trail use designations attempt to reflect a careful balancing of sometimes competing interests. While not all user groups will find that every desired trail or experience is accommodated, the RTMP is intended to provide a diverse network of trail opportunities that collectively meet a broad range of recreational needs.

It is hoped that implementation of the plan will result in a well-rounded system that enhances visitor experiences, improves sustainability and manageability, and supports the long-term protection and stewardship of park resources.

## **Master Response #16: Trail-to-Road Conversion**

State Parks received numerous comments both supporting and opposing the recommendation to convert the Two Quarry Trail to a one lane service/fire road. These perspectives reflect the importance of the trail for recreation as well as broader operational and emergency access considerations.

The Two Quarry Trail was originally constructed and used as a road prior to the early 2000s, when it was converted to a trail. In retrospect, that conversion did not fully anticipate the long-term access limitations it would create between the western and eastern portions of the park. As a result, State Parks staff and emergency responders have experienced reduced ability to access certain areas of the park internally, without relying on routes that pass through the White Oak community. This constraint can affect emergency response time, law enforcement patrols, natural resource management, project work, and routine facility maintenance.

State Parks also acknowledges and appreciates the White Oak community's ongoing collaboration in providing vehicle access through their neighborhood without a formal access agreement. However, reliance on this arrangement has at times presented challenges, and State Parks recognizes the importance of maintaining the ability for independent access when needed,

particularly for time-sensitive emergency situations regardless of potential access through the White Oak community.

Because the Two Quarry Trail was formerly a road, converting it back to a one-way service/fire road is anticipated to be straightforward along much of its alignment but would require project specific planning prior to implementation (Recommendation R-11). This would generally involve reestablishing the historic road footprint and upgrading infrastructure such as water crossings to accommodate road standards. Trail use along this controlled access service road would remain multi-use (hike, bike, horse). Once completed the road would allow access by fire trucks and other emergency vehicles.

Marsh Trail also originated as a primitive road and was later converted to a trail in the early 2000s. As a result, there are still locations along the alignment that retain clear road characteristics, including width, grade, and underlying structure. These existing features are part of what makes the route a candidate for trail to road conversion, the need for extensive new disturbance or construction is reduced.

The intent of reestablishing this route as a primitive road is not to create a general-use vehicular corridor, but rather to support essential park operations while providing multi-use trail access. Primary uses would include multi-use trail, emergency response, maintenance access, and resource management activities, with occasional patrol use as needed. These functions are important for ensuring visitor and surrounding community safety, protecting natural resources, and maintaining infrastructure across the park.

Any such change would be implemented with careful consideration of environmental impacts and visitor experience. The goal is to utilize an existing alignment with a documented history as a road, while avoiding the creation of new routes or unnecessary expansion of the footprint. Public motorized use would not be permitted, and the route would continue to be managed in a way that minimizes conflicts and preserves the surrounding landscape. As with all recommendations in the RTMP, implementation of this conversion is



contingent on available funding and staffing. If pursued, the project would be subject to the phasing and prioritization framework outlined in Chapter 6, “Implementation,” which considers project need, funding availability, and prioritization as informed by park staff, agency partners, stakeholders, and public input.

## **Master Response #17: Enforcement**

Master Response #17 addresses comments that provided suggestions for improving enforcement at the park and reducing user conflicts, and use of trail management approaches. State Parks appreciates the input regarding the need for increased enforcement of trail rules. State Parks understands that consistent compliance is essential to ensuring visitors’ safety, protecting natural and cultural resources, and maintaining a positive recreational experience for all users.

At the same time, it is important to acknowledge the practical limitations that affect enforcement capacity. The Sonoma Sector of the Bay Area District, which is responsible for law enforcement at TASP, currently has approximately five dedicated ranger law enforcement staff covering eight parks with two being assigned to TASP. These staff are responsible for patrol and response across approximately 121 miles of roads and trails, in addition to law enforcement at day-use areas, overnight facilities, buildings, and other infrastructure across a large geographic area. While this context is not intended as an excuse for limited enforcement presence, it is an operational reality that is unlikely to substantially change in the near term.

State Parks recognizes that enforcement is necessary, particularly in situations where visitors knowingly disregard established rules. However, State Parks must also prioritize ensuring that visitors have a clear understanding of trail regulations. Education and awareness are foundational to achieving voluntary compliance and reducing the need for enforcement actions.

The RTMP acknowledges these challenges and includes recommendations aimed at improving compliance through non-enforcement strategies.

These include enhanced signage, clearer communication of trail use designations and regulations, expanded resource interpretation, and efforts to promote environmental stewardship among park visitors.

In addition, the RTMP includes recommendations (R-11 and B-06) that propose converting select trails to roads. While the primary purpose of these changes is to improve emergency response capabilities and support resource management needs, they would also have the secondary benefit of increasing staff access to more remote areas of the park. Improved access can enhance the ability of park staff to conduct patrols, respond to incidents more efficiently, and maintain a visible presence in areas that are currently difficult to reach.

Given the limited enforcement resources, combined with the park’s porous boundaries and ease of access from surrounding communities and adjacent public lands, State Parks is also being thoughtful about the introduction of additional or more complex trail regulations. At this time, State Parks is mainly prioritizing the consistent enforcement and understanding of existing rules rather than expanding them to include measures such as directional trails or alternating use by day or hour. While these types of strategies are mostly not proposed in the RTMP, Recommendation P-13 does call for the option for bike-optimized directional trails. Additional trail regulations remain potential operational tools that could be considered in the future if they are determined to be effective and feasible.

State Parks will also explore the potential use of lawful and appropriate technologies to help augment staff capacity where feasible. State Parks intends to work collaboratively with partners, stakeholders, and the broader public to support trail stewardship efforts. This may include volunteer or partner-supported trail patrols focused on educating users about park rules and providing assistance when needed, serving as additional eyes and ears on the ground, and reporting concerns to park staff (Recommendation P-19).

Ultimately, improving compliance will require a combination of approaches: increasing public understanding of rules, strengthening methods to identify and respond to violations, and strategically deploying limited staff resources for enforcement actions when necessary. Citations and other enforcement measures will continue to be used as a last resort, particularly in cases involving repeated or willful noncompliance.

## **Master Response #18: Fee Structure**

Master Response #18 addresses the range of comments related to establishing visitor fees at the park. State Parks appreciates the range of comments received regarding potential fee collection at TASP. Feedback reflected concerns about affordability, particularly for low-income visitors—and support for fees if they directly contribute to road and trail maintenance. Commenters also requested additional clarity regarding how fees might be collected and how resulting funds would be allocated.

As a programmatic, long-range planning document, the RTMP is intended to provide overall direction rather than prescribe detailed operational or administrative procedures. For this reason, the RTMP does not include specific fee collection methods, as doing so could unnecessarily constrain future decision-making and limit the ability to adapt to changing technologies, partnerships, or management needs. However, identifying a reasonable range of potential approaches is helpful for public understanding, review, and future implementation considerations.

Fee collection within the state park system can be complex and, at times, controversial. Concerns regarding affordability and equitable access remain central considerations. Typically, day-use fees are deposited into the State Park Recreation Fund (SPRF) and distributed across the broader system, meaning not all funds collected at a specific park are retained locally. However, mechanisms such as donor agreements and memorandums of understanding may allow for funding to be directed toward TASP-specific

improvements, helping to address public interest in ensuring that revenues support the park where they are generated.

Implementing fee collection at TASP presents unique logistical challenges. The park’s multiple formal and informal access points, adjacency to surrounding neighborhoods, and direct connection to Spring Lake Regional Park create a “porous” system where comprehensive, mandatory fee collection is impractical. As a result, a focused and flexible approach is more appropriate.

Potential strategies that are realistic for TASP include:

- **Hybrid Model (Recommended Starting Point):** Maintain existing parking fee collection where it is already effective, while introducing voluntary or low-barrier trail support options such as QR codes, online contributions, or an optional annual pass. This approach builds on existing infrastructure, avoids disproportionately affecting neighborhood access users, and allows for clear messaging that funds support TASP-specific trail improvements.
- **Targeted Fee Collection at Key Trailheads:** Focus fee collection at primary access points—such as Channel Drive, Lawndale Trailhead, the visitor center, and Warren Richardson Trailhead—where implementation and enforcement are most feasible, rather than attempting parkwide coverage.
- **Annual Trail Pass Model:** Offer a simple annual pass (digital or physical) geared toward frequent users, functioning primarily as a “support your park” mechanism that encourages voluntary compliance and builds user buy-in.
- **Partner-Integrated Approach:** Coordinate with partner organizations such as Friends of Trione-Annadel (FOTA), Redwood Trails Alliance (RTA), and Sonoma County Regional Parks to align messaging and explore integration with memberships, volunteer programs, or regional fee structures. This approach may help reduce user concerns and improve overall program acceptance.
- In addition, RTMP Recommendation P-06 identifies coordination with Sonoma County



Regional Parks to explore a more integrated fee structure specifically between Spring Lake Regional Park and TASP. Given that a substantial portion of TASP visitors access the park via Spring Lake, TASP currently experiences associated use impacts without receiving proportional revenue to support maintenance and operations.

Regardless of the approach, several key considerations will guide future implementation:

- Transparency is critical, particularly in clearly communicating how funds are used and ensuring that investments result in visible improvements within TASP.
- Fee structures should avoid unintended double-charging, especially for visitors entering through Spring Lake Regional Park.
- User perception must be carefully considered, as fee programs may generate conflict if visitors feel they are paying into a system that limits access or does not reflect their current use patterns.
- Enforcement should be realistic, consistent, and fair, as overly complex or uneven enforcement could undermine program effectiveness.
- Opportunities to reduce cost barriers—such as income-based programs or existing initiatives

like the California State Library Parks Pass—should be incorporated where feasible.

In summary, State Parks acknowledges both the benefits and concerns associated with fee collection. Limited funding for ongoing road and trail maintenance remains a significant constraint, and user-based fees represent one potential tool to help supplement available resources. The RTMP is intended to outline a general direction and identify a suite of adaptable approaches, while allowing flexibility for future evaluation and implementation of the most effective, equitable, and practical fee collection methods.

Future fee collection strategies would be developed through ongoing collaboration and communication between State Parks, regional land-managing agencies, partners, stakeholders, and the public. While not all needs and preferences can be fully addressed, the goal is to establish a fair and transparent process that maintains continued ease of access for all users while providing the necessary funding to maintain and improve the trail system that visitors to TASP value and enjoy. A phased approach—beginning with lower-barrier strategies such as the hybrid model and adapting over time based on public response and effectiveness—could provide the greatest opportunity for long-term success.