

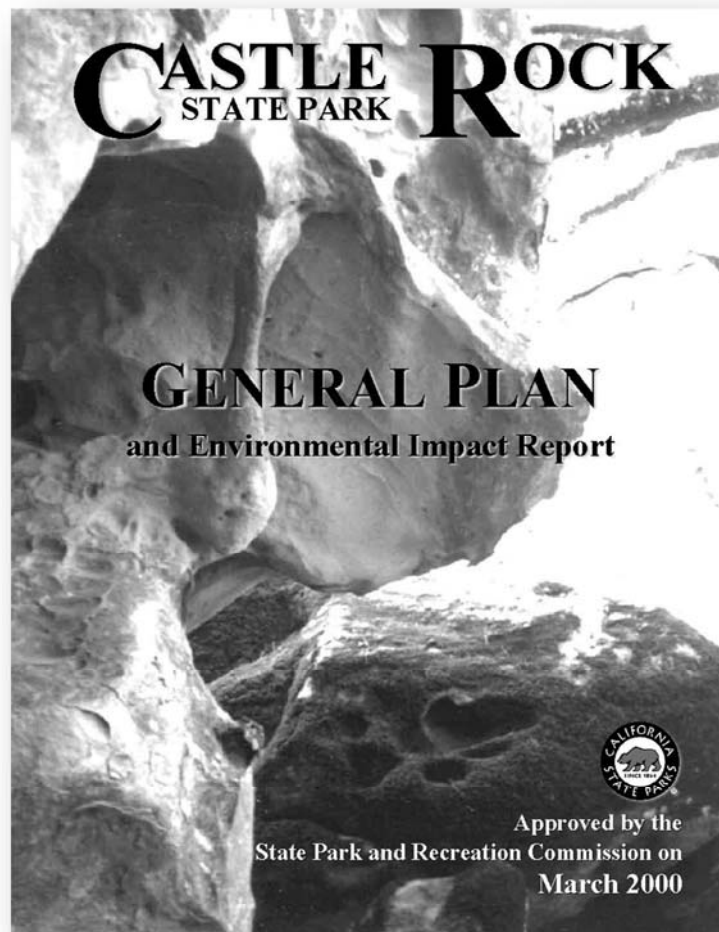
Castle Rock State Park

General Plan/EIR

CEQA

Response to Comments

January 21, 2000



Castle Rock State Park

General Plan / EIR

RESPONSE TO COMMENTS

This document represents the Final EIR/Response to Comments on the Castle Rock SP Preliminary General Plan that was approved by the State Park and Recreation Commission on March 8, 2000.

The Final General Plan/EIR is published as a separate document, which includes a copy of the General Plan Amendment and Supplement EIR for Walk-in Campsites at Partridge Farm approved by the Commission on October 25, 2000.

This document is also available as an electronic file at www.parks.ca.gov/planning

Castle Rock State Park

General Plan/EIR

CEQA

Response to Comments

January 21, 2000

State Clearinghouse #1997122063



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**CASTLE ROCK STATE PARK
GENERAL PLAN
FINAL ENVIRONMENTAL IMPACT REPORT**

The Preliminary General Plan, addendum, comments received during the public review, and Department's response to those comments constitute the Final EIR as required by the State CEQA Guidelines (California Code of Regulations, Section 15132). The Preliminary General Plan was circulated for review to state agencies, interested members of the public, conservation organizations, and local planning agencies. Comments were received from the following:

San Mateo County Trails Advisory Committee
Barbara Cliswell
South Skyline Association
Stu Langdoc
Bo Gimbal
San Lorenzo Water District
George Stammerjohan
U.S. Fish and Wildlife Service
Lawrence R. Jensen
Santa Clara Valley Audubon Society
Earnest Goitein
James and Karen Laudon
Sylvia Sippel
Eva Maria Spitz-Blum
Paul Schoemaker
Harold Drake
James Gaston
Linda V. Elkind
Loma Prieta Chapter, Sierra Club
Larry and Judith Watson
La Casa Tierra Rica
Joe Rigney
California Department of Transportation
Tim Gilbert
Parks and Recreation Department, County of Santa Clara
California Native Plant Society
Linda Brodman
The Varian Foundation
Carol C. Jacobs
Midpeninsula Regional Open Space District
Friends of Castle Rock State Park
California Wilderness Coalition

The Final Environmental Impact Report will be used by the State Park and Recreation Commission in consideration of approval of the General Plan.

Castle Rock State Park
Preliminary General Plan
CEQA RESPONSE TO COMMENTS
January 21, 2000

KEY

In order to understand the full extent of the changes in the Preliminary General Plan and the Department's response to public comments, the reader should review the Addendum as well as the comments and responses.

The following key allows the reader to reference each response by categories, as well as the number associated to the numbered comment.

Example: To review all responses related only to rock climbing, read only those numbers preceded by the symbol (RC), etc. The wilderness and camping issues (response numbers 1 and 2) were combined into single narratives for additional clarity on these subjects.

- (W) Wilderness, unit classification, Declaration of Purpose
- (S) Staffing, Operations, Visitor Contact
- (RC) Rock Climbing
- (P) Partridge, parking
- (C) Camping, Increase use
- (RM) Resource Management, Monitoring and assessment, History
- (CC) Carrying Capacity
- (RG) Revenue Generation, Concessions
- (CEQA) CEQA Compliance
- (I) Visitor Impacts, Environmental Impacts, Facility Impacts
- (PI) Public Input
- (NP) Natural Preserve, subclassification
- (D-M) Development vs. Management Plans, Level of detail
- (A) Alternative Plans
- (F) Facilities, trails
- (MB) Mountain Bikes
- (G) Goals, Interpretation, Park values, Visitor Center
- (M) Mapping, Agency coordination, Acquisition

Castle Rock State Park
Preliminary General Plan

RESPONSE TO PUBLIC COMMENTS

January 21, 2000

- (C) 1. **Camping Issue:** Castle Rock State Park draws visitors that have a specific interest in this park's environment, scenic and recreation values. The provision of limited walk-in camping is for the specific benefit of those traveling from outside the regional area who prefer separation from the automobiles, but for various reasons prefer not to or can not walk greater distances to established primitive sites. The type of facility allowed for in the general plan guidelines does not include the conventional vehicle camper and is not expected to satisfy that type of demonstrated camping deficiency in the Santa Cruz Mountains. The walk-in campsites will provide opportunities for these Castle Rock visitors to enjoy the spectacular evening, nighttime and morning hours at the unit; an opportunity that is now only enjoyed by the backpacker or the local community.

The "State Park" classification does not automatically provide provisions of automobile camping. Also, the intent of this general plan is not to mandate camping at this location, only to indicate the potential for a small cluster of walk-in campsites, with an organized parking area and the provision for access by people with disabilities.

The Partridge Farm Management Zone is approximately 50 acres. It is projected that 10 acres will be used for development and that the remaining 40 acres will be restored to native habitat. In preparing the general plan guidelines, the Department anticipated that approximately 5 of these 10 acres would be needed for the 20 units of camping.

The definition of "primitive" or "developed" campgrounds is subjective. However, by Department standards, the 23 campsites on the Saratoga Gap Trail, which requires a hike of several miles qualify as primitive. Parking is substantially removed from the immediate area and flush toilets are not provided. The 20 walk-in campsites differ in that parking, while still clustered, varies from several hundred feet to several hundred yards away and low flush toilets are provided.

It is acknowledged in the general plan that there are sensitive resources near the Partridge Farm use area. In order to protect these sensitive areas, the general plan guidelines call for on-going resource assessments that will be implemented prior to development. Any site-specific plan for camping will require additional environmental review, with a determination of potential impacts and acceptable mitigation. If unacceptable impacts result, the Department will modify management controls, including the removal or reduction of facilities. This is done regularly throughout the State Park System.

It is recognized that the species composition of this developed area will not approximate that of a pristine natural community. However, it is anticipated that any impacts associated with the campground development can be offset by the

restoration and protection of the surrounding natural communities in the area, along with the commitment to provide quality interpretation for public awareness and appreciation of the natural environment.

- (W) 2. **Wilderness Issue:** Along the crest of the Santa Cruz Mountains, Castle Rock State Park encompasses 3,860 acres of steep, densely vegetated canyons and forests. Much of the park is appreciated for its natural and scenic attributes. In 1968, this unit was classified as a “state park,” emphasizing resource preservation and protection for the park’s natural and cultural resources. The General Plan process has raised questions regarding the definitions of wilderness, wildlands, natural areas and preserves, and the priorities for management within the state park classification.

The *state park classification* (PRC 5019.53) establishes a priority for protection of natural and cultural resources. As stated, “The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora...”

With *wilderness classification* (PRC 5019.68), the key characteristic is wildness itself, together with spaciousness and lack of human modification. State wildernesses emphasize the visitor experiences, providing opportunities for solitude or primitive and unconfined types of recreation. Wilderness areas are typically 5,000 acres plus; some are tens of thousands of acres in size.

At Castle Rock State Park, the priority is given to the preservation of significant plant and animal species and their supporting ecosystems, rare plant communities, and unique geological features. About half of the park exemplifies these outstanding qualities. However, past land uses and recreational pursuits have impacted these significant resources and the situation calls for a proactive management approach. A *natural preserve classification* (PRC 5019.71) is being proposed for the most sensitive resources of the park. Natural preserves are characterized by wildness in the sense of resource integrity, rather than the spaciousness of the wilderness experience for visitors.

The Department recognizes that the native ecosystems of the park need protection. It also recognizes the importance in preserving the wildness that exist, to the degree that is possible with such intrusions as existing roads, high voltage power lines, noise impacts, and evidence of past developments and uses. Much of the park, subjected to past human activities, has gone through successional phases in returning to the more natural elements. However, logging occurred in some areas of the park well into the 1960’s, and such areas certainly do not have a “near-natural appearance.” Several miles of abandoned logging roads exist within the boundaries of the proposed natural preserve. The natural preserve classification allows for habitat manipulation based on scientific analysis, and permits the entry of heavy equipment necessary to “put these roads to bed” and restore the natural landforms. These roads are potential sources of sediment to the San Lorenzo River, and this problem may need to be addressed in the future. Also, there are other structures and developments that may need to be removed. Dozens of unsightly large concrete culverts were abandoned by the previous owner along the old Craig Springs Road and near the confluence of Craig Springs Creek and the San Lorenzo River. Wilderness

classification does not allow for entry of mechanical equipment necessary to address these needs. In addition, routine maintenance of the power line right-of-way is a legal obligation that the Department must accommodate, which is incompatible with a “designated wilderness” management.

The natural preserve classification will limit development to trails only, providing public access while protecting the park’s most wild and sensitive areas. The general plan goes further to protect resource values, by confining recreation use to a limited number of trails, with a primary focus on interpretation and education.

The Department does not consider it appropriate to classify Castle Rock State Park as a state wilderness. State park status combined with a large natural preserve is sufficient to protect the resources of the park. Therefore, the general plan will not include a detailed analysis or program for bringing the park into a wilderness classification, as some reviewers have suggested. Other suggestions included the use of "wilderness" in the name of this state park. This could lead to confusion regarding the management directions and expectations on behalf of the public and other agencies, as it has in the past with Sinkyone Wilderness State Park. There appears to be no advantage in repeating the situation at Castle Rock State Park.

The Declaration of Purpose proposed in the general plan serves to recognize the protection of significant resources and opportunities for interpretation and the public’s enjoyment of these resources. It provides a broad view of the park’s purpose within its state park classification. In evaluating the present Declaration of Purpose, the Department determined that it should not arbitrarily discount “improved” facilities in the future, and that the use of modern methods may better serve visitor needs. The general plan goals and guidelines provide the protective language and important considerations for management of resources and facilities development. The unit vision and descriptions of specific areas have been revised and strengthened, and in conjunction with the Declaration of Purpose provide a better image of the park’s future.

- (RM) 3. Prescribed burning of the Knobcone Pine Forest can satisfy two objectives. One objective insures the continued existence of a plant community determined to be rare by the California Department of Fish and Game. The other objective is a reduction of fuels that are increasing as the stands age and die. The control of such a burn would not be overly difficult, since these burns utilize standardized Department procedures with specific prescriptions reviewed by the California Department of Forestry and Fire Protection. These rigorous conditions insure that prescribed burns are conducted with minimal hazard to surrounding lands.
- (I) 4. The lack of abundant water, toilets, camping, and concessions is the current condition at the park. The public is not treading lightly as is evidenced by the impacts around the popular Castle Rock Ridge. The lack of restrooms usually results in a sanitation problem around public use areas.
- (RM) 5. Fortunately, the topography of the area you describe constrains visitors to the already established trail. Shooting stars are plentiful in the park and occur in the grasslands and oak savannahs near ridgetops. These flowers are not considered rare in the legal sense by either the federal or state government. However, park rules and regulations do not allow picking of wildflowers. Further,

as described in the Unit Purpose and Vision portion of the preliminary general plan, it is the Department's intent to motivate visitors to help protect and preserve all park resources through education and interpretation.

- (S) 6. The term "adequate" referring to funding and staffing can be subjective depending on the position and expectations of the observer. Castle Rock is allocated two full-time ranger positions. Also, personnel from other units, such as Portola and Big Basin Redwoods State Parks traditionally supplement staff.

Funding and staffing are authorized by the Department of Finance and the Legislature and are outside the scope of the general plan.

Volunteers represent a significant contribution to park operations and management. During the general plan process, a number of people indicated their willingness to volunteer at Castle Rock State Park. Those names were compiled and contacts made based on their interests. The park currently has a group of individuals who assist with patrol and assessment of incidents in the park, particularly in the Lion Caves area. The Mountains Sector, in which Castle Rock is a unit, is working on guidelines for the coordination and utilization of volunteers. It is intended that volunteers will be involved and assist in almost all aspects of park management, including daily patrol, resource studies, facility maintenance, climbing regulations, etc.

- (I) 7. Your reference to trespass and vandalism would indicate that neighbors of Castle Rock State Park have experienced serious problems on a continuous basis. However, the Santa Cruz District has no records of reported incidents in the past several years; consequently, there does not appear to be major activities in these areas. When trespasses or vandalism occur and are reported, a law enforcement officer is dispatched to investigate the situation, depending on the severity and immediacy of the offense. A citation can be issued or arrest made if there is an identifiable suspect present. Procedures to mitigate and curtail significant, repetitive activities would be researched, analyzed, and enacted. It would be necessary to consider the specifics of each situation.

New trails and facilities would be located with adequate buffers (existing vegetative screening or topographic landforms) from private properties. Signing will direct visitors to park facilities and points of interest, while clearly identifying limits of park boundaries and areas prohibited for public access. Personal contacts with visitors and interpretive messages will attempt to increase public awareness and understanding of park rules and regulations, recreation opportunities on public lands, and constraints for public use due to potential impacts on sensitive resources and adjacent private properties. Locations for trails, parking access points, and other visitor amenities and impact on water supplies by developments and accompanying activities would require CEQA documents for public review and comment. No significant impacts are anticipated. When specific facilities are proposed for on-site development, the plans will be subject to review for impacts and mitigation.

There is no change in the current use planned or projected for the easement through Indian Rock Ranch.

(RM) 8. Prioritization of park programs are partly guided by an approved general plan, and resource protection and natural process management are given high priority (see Table 4, pgs. 57-58) in the general plan. A general plan for a unit provides guidelines for various resource management proposals, however as a guideline document it does not establish program funding and is not a implementation plan. Determination of a suitable resource monitoring program will be made after the general plan is approved. Although a "limits of acceptable change" program has been discussed at public meetings and in earlier versions of the general plan, methods for resource monitoring and data collection are yet to be determined. The Santa Cruz District, in consultation with other Department sections, will establish an appropriate resource assessment program. Currently, the Department is implementing an "environmental conditions assessment" program at selected park units that provides for monitoring of park units natural elements and processes and provides feedback for remedial action. Contingent upon funding, it is the Department's intention to implement this program in units throughout the State Park System.

(C) 9. *Please see response to item number 1.*

(I) Ranger and docent patrols, trail design and routing, interpretation and public education can control illegal access or improper use of sensitive resources.

The water supply at Partridge Farm area currently meets domestic water quality standards. The method or location for sewage disposal has not been determined. A leach field is the most likely system for sewage disposal.

(S) (I) Ranger patrols are the most effective deterrent to illegal camping and fires outside of designated areas. We recognize that there is limited ranger staff available, but they would be more immediately available at the Partridge Farm area than currently exists. The same restrictions for open fires that exist for the trail camp would apply to the proposed campsites. Fires are permitted only in designated fire pits during the off-fire season.

(PI) 10. Public agencies, such as California State Parks, by their very nature are constantly open to public input and review. Specifically at Castle Rock, there is currently a climbing committee composed of private citizens working on the climbing management plan, and there is a trails committee that will work on the trail plan. Individuals are welcome to communicate with any park employee or committee member in order to obtain and provide information or to express their viewpoints on these plans. Comments are particularly helpful with regard to park plans during the preparation and implementation stages.

Advisory councils, like the Castle Rock Advisory Committee, are established for specific purposes to accomplish identified goals. If a situation or project arises whereby an advisory council would be the most appropriate and effective forum for addressing a particular issue, the formation of a committee or council would be entertained.

The Mountains Park Superintendent has established open office hours in Boulder Creek. In addition, representatives from the Santa Cruz District are available to attend specific meetings of the homeowners' association to discuss or present particular issues or items.

- (RC) 11. Your request was given serious consideration during the planning process, both for exempting the Ridge Trail Cliff to allow climbing or revising the boundaries of the natural preserve. The Department determined that by exempting Ridge Trail Cliff and allowing it to be climbed in the natural preserve, it would set an undesirable precedent for doing the same in other areas in the preserve. This would encourage exploration of new climbing opportunities resulting in more volunteer trails and increased impacts on significant resources. This rock is considered cliff habitat for special status crevice roosting bats and potential peregrine falcon roosting. The steep slopes and highly erosive soils at the base of the cliff are unfavorable for intensive use. Concern was also expressed for visitor safety near the edge of the Ridge Trail cliff. The Department does not support re-routing the natural preserve boundary around Ridge Trail Cliff. Our objective is to enhance the recovery of ecological processes by limiting visitor access through the preserve to a few hiking and interpretive trails. The impacted areas around Ridge Trail Cliff would be allowed to revegetate with native species and provide habitat for sensitive wildlife when climbing is discontinued at this location.
- (NP) The size of the proposed natural preserve encompasses not only the locations of sensitive plant and animal species or habitat, but includes substantial portions of their supporting ecosystems and significant geologic features. As well, the proposed boundaries or limits of the natural preserve follow existing roads, trails, river and stream corridors and state park boundaries, whereby reflecting a practical management unit.
- (RC) All recreational activity directly, or indirectly, has some impact on park resources. One objective of the general plan is to eliminate visitor impacts on the significant geologic formations in the natural preserve that may result from climbing or other recreational uses. Another objective is to eliminate volunteer trails that adversely impact native vegetation, soils, and wildlife habitat. Low-impact climbing will be permitted outside the natural preserve where this activity can be better monitored and managed within acceptable limits, as guided by a future Climbing Management Plan.
- (RC) 12. The statement on page 111 regarding the unavoidable impacts from climbing is not absolute. The impacts associated with climbing **may** (emphasis added) continue. However, there is a potential for significant impacts (vegetation loss, removal or loss of moss from rock faces, erosion of soil, etc.) even with the implementation of a climbing management plan. Climbing generally concentrates use and is limited to specific areas; impacts from other recreational activities (hiking, picnicking, etc.) can be mitigated through relocation and dispersal.
- (RC) 13. The text in the preliminary general plan will remain unchanged. We believe that by inserting the word “increased” it would change the straightforward assertion that “impacts from climbing and other forms of recreation . . . have resulted in a general decline in resource values.” Impacts from *increased* climbing would likely result in an *increased* decline in resource values.

- (RC) 14. The Department believes that the current language of the Declaration of Purpose ...*supporting ecosystems of the upper watershed of the San Lorenzo River...* is sufficient and applies to the whole park, including the Castle Rock Ridge. Also, the term Castle Rock Ridge is used by others referring to areas inside and outside the park along Skyline Boulevard.
- (I) 15. On page 66, first paragraph, the last sentence will be revised as follows:
- These differentially weathered features, including caves, spheroidal masses referred to as “cannonballs,” and lattice-like structures on rock faces and walls termed “fretwork,” are often very fragile ~~to the touch~~ and can be easily damaged.
- (C) 16. *Please see response to item number 1.* The 20 new campsites at Partridge Farm are proposed to provide a somewhat different overnight experience for the public. Unquestionably, there are sensitive resources near Partridge Farm as there are near the existing trail camp and current parking lot. The General Plan proposes a baseline study and on-going assessment and evaluation program that could provide management and development directions or limitations.
- (I) Previous agriculture at Partridge Farm reduced its value to wildlife. With the proposed day use parking and campsites, most of the Partridge Farm area will remain undeveloped and, either naturally or with resource management, can provide more wildlife habitat than currently exists.
- (P) (I) 17. The priority for recreation enhancement at the Partridge Farm RMZ was selected based on the existing site condition, topography, public accessibility, availability or potential for providing utilities and potential for visitor contact by operations staff. This combination of these characteristics makes it the best site in the unit for recreation enhancement. If the existing main parking lot had not been constructed prior to the Partridge Farm acquisition, it would not be constructed in its current location, but at Partridge Farm.
- (D-M) 18. The general plan is intended to be a goal-oriented planning document that sets forth a purpose and vision for the park that is not time-dated. If the plan is too specific on how things should be done, it risks becoming obsolete when site specific information and greater knowledge is obtained. Subsequent site-specific plans will initiate the CEQA process and second tier of environmental analysis.
- (S) Implementing the general plan guidelines may require involvement of Department staff beyond the unit rangers and/or outside assistance from the educational and scientific community may be needed. However, many of the facilities proposed by the general plan are for replacement or relocation of existing uses and intended to improve the unit operation's efficiency. They may not require additional staffing. As well, the District is continually evaluating staffing needs with or without special projects.
- (I) (C) 19. The impacts on the various ecosystems around Partridge Farm by the 24 hour-a-day presence of people (camping) were not considered significant. With the exception of the Lion Caves area, these areas are currently exposed to considerable visitor impact. The proximity to the gun club and its attendant noise

has already displaced some wildlife. The net impact of camping was not considered to be significantly adverse. A small portion of the Partridge Farm area would be dedicated to visitor use; the remaining area would be allowed or restored to a more native state providing more wildlife habitat.

- (S) (P) (I) The Department recognizes that any added public use facility development would require additional ranger and maintenance commitment. The concept is to increase efficiency by relocating or diverting some public use to one location providing more visitor contact. Providing restrooms and trash receptacles at Partridge Farm will aid in the reduction of human waste and litter in the outlying areas.
- (C) (I) Admittedly, once public use facilities are constructed, there is considerable inertia to continue their operation, but not an irresistible inertia. The Department is now proposing to relocate a 72-unit campground at Pfeiffer Big Sur State Park. Currently, trails are regularly rerouted or closed for resource protection reasons. The walk-in camping suggested at Partridge Farm was proposed to allow future consideration for overnight use, but only after appropriate resource assessments have taken place. There is no funding for development. It is the intent of the Department to initiate environmental baseline studies for impact assessments prior to any development.
- (I) 20. No mitigation was proposed, because the specific impact of the 24-hour presence of people or camping was not considered significant. Impacts resulting from all increased recreation use were considered significant and mitigation was proposed.
- (I) (A) 21. As is stated on page 112, "It is possible to combine elements from each alternative to create additional alternatives." An infinite number of alternatives could be created. The alternatives presented were those that could meet all or some, in varying degrees, of the goals and objectives of the unit as expressed in the Declaration of Purpose and Unit Vision. These alternatives were presented to provide a broad range of feasible proposals for discussion and comparative purposes. The State Park and Recreation Commission can also modify the plan for their approval.
- (A) 22. *Please see response to item number 21.*
- (F) 23. The trail you refer to is not designated as an "official" trail on any park maps. It was put in years ago by a horse concessionaire and unofficially named the Bay Laurel Trail. This trail route will be considered like any other new trail when the Trails Management Plan is prepared.
- (M) 24. Maps in the final general plan will reflect the ownership of public lands based on our latest information at that time. Our Department will request an update of open space preserve boundaries from MPROSD for this purpose.
- (M) 25. The Department recognizes the need to coordinate management of sediment sources from park roads and trails with appropriate agencies such as the Regional Water Quality Control Board and the San Lorenzo Valley Water District. Irrespective of a Trail Management Plan, the district strives to comply with CEQA when maintenance is required for existing roads and trails. Please

be assured that the Department will work with the San Lorenzo Valley Water District in developing a Trails Management Plan, especially for new roads or trails affecting the Water District's property.

- (S) 26. *Please see response to item number 18.*
- (O) 27. Any errors in the history section of the general plan will be corrected.
- (RM) 28. Limited surveys for red-legged frogs in 1997 yielded no observations of bullfrogs or red-legged frogs. However, bullfrogs were documented as occurring in the park in 1979 and may still be present. The discussion regarding exotic animals on page 16 will be amended to include bullfrogs.
- (RM) 29. A guideline will be added under the goal of "Protect and perpetuate native wildlife populations at the park" that will read as follows:

Guideline:

- The Department will work with surrounding property owners and jurisdictions to reduce the numbers of non-native animals such as feral pigs, feral cats, cowbirds, bullfrogs, and starlings in the park.

- (RM) 30. The Department has made a survey for both sensitive habitats and sensitive plant species in Castle Rock State Park. None of the plant species on the lists you included in your comments were located. The South Bay clarkia was reported near the park, but could not be found during field searches over two successive seasons. Extensive field investigations did not reveal serpentinized rock outcrops and associated soils anywhere in the park. Any proposed future developments are subject to CEQA, and the Department will conduct surveys for sensitive species during appropriate seasons.

Park-wide surveys of sensitive animal species are recommended in a guideline that serves the goal to "Protect and perpetuate native wildlife populations at the park (see the second paragraph under the guidelines for this goal; page 63)."

- (RM) 31. The Department agrees that such a monitoring program is warranted for sensitive species preservation in the park. The "environmental condition assessment" program currently being developed by the Department is specifically intended to provide ongoing assessment of the status and trends of environmental conditions. Contingent upon funding, it is the intent of the Department to enact this program system-wide.
- (P) (RM) 32. The Partridge Farm area is not pristine. This area has undergone land use alterations for over 100 years, primarily from agricultural practices (e.g., truck crop and Christmas tree farming). Because of these practices, the area has been exposed to various forms of disturbance such as extensive topsoil loss and changes in plant composition. While the area is showing signs of vegetative recovery, invasive exotic plants continue to dominate the understory. There are, however, opportunities to restore the natural communities in this area. Guidelines in the proposed Preliminary General Plan call for the restoration and protection of cultural and natural resources in the Partridge Farm Resource Management Zone (page 86).

- (P) The additional parking proposed for Partridge Farm would replace existing parking along the highway and in the main parking lot. Our goal is to reduce impacts by reducing random access and increasing public contact, not to increase day-use parking capacities. The increase of 30 cars relates to the parking for the proposed 20 walk-in campsites.
- (P) 33. The general plan on page 91, requests that Caltrans post “no parking” signs for approximately 2 miles along State Highway 35, south of the Summit Rock parking lot. The property across the highway from Mt. Bielawski is not state park property. It would likely be in the Caltrans right-of-way or Sanborn County Park property. Regardless of ownership, our Department believes that developing a new parking lot on the opposite side of a major highway from the park would reduce visitor safety and increase law enforcement problems for trespassing onto private properties.
- (C) 34. *Please see response to item number 1.*
- (W) 35. *Please see response to item number 2.*

It is true that much of the park subjected to past human activities has gone through successional phases leading to more natural elements and processes. However, logging occurred in some areas of the park well into the 1960’s, and such areas certainly do not have a “near-natural appearance.”

While the Department acknowledges that the size criterion could be fulfilled, it believes that wilderness classification is not warranted.

- (C) 36. *Please see response to item number 1.*
- (RM) 37. The intent of statements such as the one you quote is not to downplay the importance of native wildlife in the park, but rather to provide a general statement that characterizes the distribution of many of the park’s vertebrates in relation to those that have a special significance, as identified by the California Department of Fish and Game and U.S. Fish and Wildlife Service.
- (I) (C) A guideline is provided regarding overnight use facilities that tie resource assessments, and mitigation measures to campsite installation (page 94). *Please see response to item number 1.*
- (D-M) The format of general plans currently adopted by the Department of Parks and Recreation is such that specific information will be summarized (i.e., Resource Summary). Because of the general nature of this document, the detailed information you suggest is not required nor provided, but more appropriately included in the resource inventory documents.
- (RM) 38. Various accounts describe wild turkeys as being non-native to California. Audubon Society Encyclopedia of North American Birds by John K. Terres, 1984, describes the present natural range of the turkey (Meleagris gallopavo) as being from the eastern U.S. west to Colorado and Arizona, and south into Mexico. Wild turkeys are described as being first introduced into California in

1877 in the California Department of Fish and Game's document entitled California's Wildlife, Volume II, Birds (1990).

The Department considers brown-headed cowbirds a non-native because, while they entered the state on their own, human-induced conditions here prompted their arrival. The discussion in the Preliminary General Plan document regarding cowbirds was meant to inform the reader as to the problems related to its phenomenal spread and the impacts it has had on other native species, particularly neotropical migrant songbirds that nest in California.

The impacts of human-induced populations of corvids are also of concern for the Department.

- (RM) (I) 39. The comment about food attracting corvids and other scavengers is an accurate assessment. However, other parks have demonstrated sensitivity to this issue and success in mitigating the impacts by using animal proof trash cans. The general plan does not mandate a food concession. If a concession were considered in the future, feasibility and impact studies would be conducted. *Please see response to item number 120.*
- (RM) 40. Designation of an area as moderate use intensity does not preclude the Department from using prescribed fire as a management tool. It is an appropriate method for the park's black oak woodlands.
- (NP) (W) 41. The State Park classification places its highest priority on preserving the outstanding natural, scenic, and cultural values in the park. Improvements are made for the public's enjoyment and education, consistent with the preservation of these resource values. Within this state park classification is a proposed natural preserve that would provide special protection to the most significant park resources, whereby improvements are limited to trails. Wilderness subclassifications are reserved for more spacious areas in parks where the visitor's experience in primeval areas would be the primary goal. It is the Department's intentions to manage rock climbing activities and restrict climbing where necessary to protect nesting sites, regardless of classification. Please see response to item number 2
- (P) 42. The Partridge Farm area is the most suitable site for the provision of visitor parking and facilities development, based on the soils, topography, access, and existing vegetation. The goal to minimize resource impacts from visitor use is important throughout the park regardless of the parking location, including the existing parking lot.
- (C) 43. *Please see response to item numbers 1.* Walk-in campsites are compatible with the state park classification and resource management objectives stated in this general plan.
- (F) (MB) 44. There are specific departmental policies concerning mountain bikes; however, due to the individual and unique conditions of each State Park unit, final determination regarding the use of mountain bikes remains at the discretion of the District Superintendents, as described in the Commission's policy found in Appendix F of the general plan. The District, sector, and unit staff are aware of the inherent problems with mountain bike usage considering their impact on the

land, potential conflicts with other users, and the inability to regulate and ensure appropriate trail use throughout the park. The Castle Rock Trails Committee, comprised of private citizens and Department staff familiar with the area, is charged with working on an overall trails plan with attendant uses. As with the rock climbing community, it is important to work with these user groups to achieve sensitivity, support, and compliance.

(MB) 45. *Please see response to item number 44.*

(D-M) 46. The Preliminary General Plan document is a steering document at the most general level. Other, more focused planning such as unitwide prescribed fire management, wildfire management and vegetation management plans provide the details necessary to follow the guidelines and achieve goals presented in the General Plan. Aside from the Unitwide Wildfire Management Plan, no specific resource management plans have been developed or adopted for Castle Rock State Park; therefore, there are no details to present at this time.

(RM) The concept of reinstating the benefits of fire stems from the fact that recurrent wildfire has been a major factor in the evolution of many of the plant communities in the park. Some plant communities, such as the knobcone pine and chaparral assemblages, require recurrent fire for providing the right conditions for reproduction. Also, without natural recurrent fire we have experienced an accumulation of dead fuels that would otherwise be combusted. Prescribed fire is employed to burn the build-up of fuel before they accumulate to dangerous levels.

The Department of Parks and Recreation has employed prescribed fire as a tool to achieve fuel management and ecological objectives since 1973. Detailed unitwide plans, as well as project burn plans, are developed and implemented using techniques and methodology employed by the California Department of Forestry and Fire Protection (CDF) and the U.S. Forest Service. Burns are only implemented under prescribed weather and fuel moisture conditions. Proposed burn plans must be provided to the Regional Air Quality Management District for review and permitting. Furthermore, Burn Plans are subjected to the California Environmental Quality Act process, which provides for a review period similar to the review period for the Preliminary General Plan. Park neighbors and visitors are advised of proposed burns prior to project implementation.

The Department of Parks and Recreation maintains a cadre of trained fire personnel that implement burns. Also, CDF and other federal or local fire agencies frequently participate on our burn projects.

(I) 47. The intent of units classified as State Parks is to preserve and protect natural and cultural features and processes and to provide high quality recreation. When viewed from this perspective, utility easements that are visually intrusive and that allow for on-going alterations of vegetative and soil features are undesirable. It is recognized that the Department cannot eliminate legal rights of way, however this should not prevent the cooperative effort between the utility provider and the Department from working towards a solution that will lend itself to protecting and preserving public resources. Any such action towards the cooperative removal or undergrounding of utilities is subject to the California Environmental Quality Act review process.

- (RC) 48. Not all rock climbing is recognized as damaging to resources. The Department feels it should be allowed where it can be managed within appropriate resource management guidelines. The general plan calls for the preparation of a Climbing Management Plan that will give direction to low-impact climbing outside the proposed natural preserve. *Please see responses to items number 51 and 68.*
- (C) 49. *Please see response to item number 1.* The public's pursuit for recreational opportunities and experiences will increase in the Santa Cruz Mountains parks and open space preserves. Nevertheless, due to the park's resource values and sensitivities, the general plan does not plan for an increase of recreational use at Castle Rock State Park, other than for overnight use of 20 walk-in campsites. The parking and other facility improvements proposed by the general plan are intended to accommodate the current level of use while managing for improved resource conditions and quality recreational experiences.
- (S) (D-M) 50. It is not within the scope of the general plan to include a detailed operations plan addressing staffing, funding, and methods of implementation. The general plan is intended to serve as a goal-oriented vision type of long-range plan for this state park. The details of management and implementation that you request are the results of future management and project plans that will be prepared at a time when funding is made available and potential impacts can be more accurately assessed. We are not trying to provide more recreational opportunities (except for the walk-in campground) for the ever growing population, but instead, provide guidelines on managing the existing levels of use.
- (RC) 51. On page 89, the general plan states that a Climbing Management Plan should be prepared to establish appropriate guidelines for climbing that protect geologic features and significant natural and cultural resources. Our Department has begun this process with volunteers from an organized climbing committee and park staff. The committee is identifying what detailed site information and additional studies are needed. Experts in the scientific community and other agencies will be contacted for involvement in this process. The public will have an opportunity to review and comment on future environmental documents that relate to projects proposed for implementation.
- (S) 52. *Please see response to item number 50.* Staffing and training are not within the scope of the general plan. That will be determined as a part of the various phases of implementation.
- (P) 53. The general plan does not propose an increase in Highway parking, new roadside parking areas, or an increase in total parking on state park property. Our goal is to improve parking conditions and the management of current problems of garbage, vandalism, and trespass. Our Department will coordinate with Caltrans to evaluate existing roadside parking areas along State Highways 35 and 9 for possible closure or improved parking use and trailhead access, as indicated by the guidelines on page 92 of the general plan.

- (G) 54. Public information and education on the natural and cultural resources are embodied in the discussion of interpretive goals and themes for the park, as described on pages 75 - 80 of the general plan. More specific guidelines and description of interpretive facilities and programs will be included in the Interpretive Prospectus currently being prepared for Castle Rock State Park. The District and park staff efforts in interpretive research, planning, and programs are supported by volunteers administered by the Volunteers in Parks Program or through a cooperating association.

Periodically, visitor satisfaction surveys are conducted at State Park System units to help understand what visitors consider most important and how satisfied that they are with park management, facilities, and services.

- (F) (MB) 55. *Please see response to item number 44.* There are specific departmental policies concerning mountain bikes, however, due to the individual and unique conditions of each State Park unit, final determinations regarding the use of mountain bikes remain at the discretion of the District Superintendents (see Park Commission policy Appendix F). The District, sector, and unit staff are aware of the inherent problems with mountain bike usage considering their impact on the land, potential conflicts with other users, and the inability to regulate and ensure appropriate trail use throughout the park. A mountain bike committee has been established within the Santa Cruz District, and the Castle Rock Trails Committee, comprised of private citizens familiar with the area, is charged with working on an overall trails plan for this park with attendant uses. One of the goals for the Castle Rock Trails Committee is to facilitate locating a mountain bike route from the "crest to the sea."

- (I) (G) 56. A general plan has been developed for this unit to address the question of future visitor impacts. The guidelines focus on significant resources and modest improvements to better manage visitor access and appreciation of resource values. The general plan identifies several planning issues and needs of park visitors, including resource management and operations. We've identified areas in the park where resource conditions and facilities are sub-standard and/or need improvement. Also included are guidelines to improve interpretation, education, parking, and management of visitor activities. *Please see response to item number 49.*

- (G) 57. An interpretive center helps to orient and educate the visitor to the particular area or park unit, which is integral to the individual's experience; each visitor center has a different story to tell, and one does not substitute for another. Principally, any interpretive or visitor center in relation to Castle Rock State Park (depending on the size, contents, and purpose) would either be self-guiding or staffed with volunteers. The visitor center suggested at the Saratoga Gap property has been a long term proposal encompassing a greater scope than Castle Rock SP and involving three agencies: Midpeninsula Regional Open Space District, Santa Clara County Parks and Recreation, and California State Parks. This facility would require a great deal of planning and coordination before it could be established or become operational.

- (P) 58. *Please see response to item numbers 32, 33, and 53.*

(MB) 59. *Please see response to item numbers 44 and 55.*

(W) 60. *Please see response to item number 2.*

(RM) 61. The Travertine Springs were identified as important and unique features of the park. They were delineated as a specific Resource Management Zone and assigned resource management objectives that provide for their protection and preservation (see Table 4, page 58). A section will be added in the Area Goals and Guidelines section that identifies the goal and guideline for this area as follows:

Goal: Maintain, protect and perpetuate the Travertine Springs occurring in Castle Rock State Park.

Guideline: The Department should develop and implement a specific area plan that provides for the protection and preservation of the Travertine Springs occurring in the park.

The Preliminary General Plan does not provide the detail requested regarding the earthen dams. These details will be developed in the proposed Watershed Management Plan, as called for in the Guidelines section under "Watershed Management" (page 59).

(P) (I) 62. The discussion of trails and parking on page 33 is only a description of existing facilities. The general plan provides guidelines for the management and protection of sensitive resources in the areas adjacent to Partridge Farm, and the Department intends to establish an environmental condition assessment program. *Please see response to item number 8.*

(P) 63. *Please see response to item numbers 32, 53, 108, 170, and 185.*

(C) 64. *Please see response to item number 1*

(I) 65. *Please see response to item number 110.*

(I) (CC) 66. The current level of use and facility development is causing some resource "degradation" or impacts. An increase in use could increase impacts, but with improved trail management, climbing management, facility siting, etc. it is possible to reduce resource impacts even with an increase in use. The theoretical maximum day use for the existing or "no project" is 2018; the theoretical maximum for the proposed project is 2078 or a modest 3% increase.

(MB) 67. *Please see response to items number 44 and 55.* A trails committee, comprised of staff and private citizens familiar with the park, will be working on an overall trail plan and attendant uses.

(RC) 68. State Parks is in full agreement ". . . that some form of management plan between State Parks and rock climbing organizations is necessary . . ." Toward this objective, the Castle Rock Climbers Committee was established in December 1998. There are 12 members of this committee representing the

various types of climbers, under the direction of district and park staff, with the goal to produce a Climbing Management Plan for Castle Rock State Park.

- (P) 69. Our Department does not agree with your assessment that this general plan is a "Partridge Development Plan". The park's purpose, vision, natural preserve designation, resource management and recreation guidelines, and provisions for interpretation and education are the primary focus of this plan, and the potential development at Partridge constitutes less than 2% of the park for public use facilities.
- (CC) 70. The discussion of carrying capacity is presented on page 70 and referenced on page 48. It is the Department's intention to regulate visitor activities and determine use limits, as necessary, when detailed management and development plans are prepared and more site-specific information is obtained. Future development plans are subject to further environmental reviews.
- (RG) 71. The concession possibilities or proposals at Castle Rock State Park in no way compare with the size and magnitude of Yosemite National Park. The minimal provisions for concessions at Castle Rock State Park are not motivated by revenue generation but by visitor convenience and service. *Please see response to item number 120.*
- (RM) 72. The various resource management philosophical approaches, resource management objectives, and resource management goals represent the intent of the Department. The Preliminary General Plan document, with the approval of the State Park and Recreation Commission, becomes the official approved direction that the Department intends to follow.

The Department does not see the use of the terms you identified as potential for a later lessening of the Department's direction or commitments to either the various resource management philosophical approaches and resource management objectives stated in Table 4 (pp. 57-58) or goals stated in the Unitwide Resource Management Goals and Guidelines (pp. 59 –81) and the Area Resource Management Goals and Guidelines (pp. 82-98). It is necessary to understand the overall context of the Resource Management Directives and the Department's intent in establishing them. They are not absolute mandates, but are guidelines that allow the flexibility necessary for the proper management and protection of State Park System resources. Similarly, the goals and guidelines of a general plan articulate and enforce the plan's intent and desired outcomes.

The Department has found that deciding the method(s) of implementing a guideline revolves around the conditions that are current at the time a related management program or project proposal moves into various priorities for action. Therefore, it is preferred that the general plan level of planning set the goals and give guidelines to clarify the intent and the desired outcome, and the details of managing the implementation process be defined and applied at a point when they are more appropriate to existing conditions and known procedures.

- (MB) 73. *Please see response to item number 44.*

- (S) 74. "Consolidating activities at one central point . . ."not only serves to make park management easier but is a well established planning principle. It is more effective and efficient to orient and contact people at one location in order to disburse information and regulate or control activities, rather than staffing a dozen entry points and patrolling 4000 acres to locate visitors and inform them about park rules and regulations. In addition, resources are better preserved unitwide with facilities development limited to this one area.
- (P) (I) 75. The general plan does not preclude the opportunity to explore and experience the park in ways that you describe. Opportunities exist at Partridge to accommodate access for other visitors to have a similar experience without destructive consequences.
- (RG) 76. The minimal facilities' development and concessions' proposals are factually not motivated by revenue generation, but to serve the visitor within the mission and purpose of the California Department of Parks and Recreation.
- (P) 77. Based on the Department's inventory of existing resources, the Partridge Farm area is not considered a sensitive ecological site. Our Department explored the potential benefits at Castle Rock for both wildlands preservation and to provide quality recreation opportunities. The general plan has guidelines that can move us toward meeting that goal.
- (RG) 78. The general plan does not give priority to revenue generation.
- (M) 79. It is true that the area you describe is primarily composed of grasslands, with some intermixed chaparral. Most of the mapping of park vegetation was based on the 1979 Castle Rock Inventory, prepared by Harvey and Stanley Associates. State Park staff did selected ground truthing to determine the overall accuracy of this information. At the scale used in the 1979 survey, areas less than an established minimum size were included as part of the surrounding dominant vegetation type. The mapping scale for this general plan does allow for more specific delineation of plant communities, and the final general plan will be amended accordingly.
- (RM) Your description of a near monoculture of Douglas-fir in your residential area is accurate. Fire suppression over a long period favors the establishment of Douglas-fir at the expense of grasslands and oak woodlands. However, prescribed fire is only one of many methods employed by the Department for vegetation management. It is left to the discretion of the district to utilize the most appropriate methods for managing the resources.
- (P) 80. *Please see response to item number 32.* Support facilities are needed to operate a state park, and Partridge is the best location to provide these services without placing them in sensitive habitats. Partridge is currently used for staff housing, maintenance and administrative purposes, as well as for parking during special visitor events. The goal of the general plan is to integrate these functions into a more cohesive arrangement that provides for support facilities needed by visitors while protecting resources.
- (W) 81. *Please see response to item numbers 2.*

- (P) 82. There is no plan to develop a new visitor center at Partridge Farm. However, adaptive use of the Partridge House may be considered for exhibit space. Also, there is an existing interpretive shelter that would continue to be used for providing interpretive information. Exhibit improvements could be made for this structure. As is stated in our response to item number 1, the larger part of Partridge Farm will be returned to a more natural state. The general plan does propose to locate the park headquarters office and visitor contact at Partridge Farm.
- (G) 83. The general plan proposes a potential location for a multi-agency visitor center at the western quarter of the Saratoga Gap intersection. This site was proposed for its visibility and accessibility from the highways. The Caltrans maintenance site was considered, but was rejected because access from the Indian Rock subdivision road would interfere with residential traffic and access directly from the highways would require extensive construction.
- (CEQA) 84. *Please see response to item number 97.*
- (CC) 85. The discussion of carrying capacity on pages 70 - 72 clearly defines categories of allowable use intensity that correlate the significance, sensitivities, and constraints of the unit's resources with an allowable degree of disturbance due to human impacts.
- (RM) 86. *Please see response to item number 102.*
- (CEQA) 87. *Please see response to item number 97.*
- (D-M) 88. It is not the intent of the general plan to provide extensive detailed resource data. It provides an understanding of significant resource values as the basis for addressing "general" planning issues, and establishes a framework and direction for more focused resource planning that occurs beyond the approval of the plan. Collection of more detailed resource data is appropriate and necessary in subsequent planning phases.
- (CEQA) 89. *Please see response to item number 97.*
- (RM) 90. *Please see response to item number 72.*
- (RM) (D-M) 91. The Preliminary General Plan provides guidelines that call for the development of a Watershed Management Plan (p. 59), a Prescribed Fire Management Plan (p. 62) and a Wildfire Management Plan (p. 63). Additionally, the Unitwide Resource Management Goals & Guidelines identify the need for a comprehensive resource management program. While you do not perceive these to be mandates, they show the Department's intent to fulfill the Resource Management Objectives appearing in Table 4, pages 57 & 58. *Please see response to item number 72.*
- (NP) (RM) 92. The area proposed for subclassification as Natural Preserve is recognized as core habitat. This "core" area is buffered by most of the balance of Castle Rock State Park lands (outside of designated use areas such as Partridge Farm, the Saratoga Toll Road, and heavy climbing use areas). The discussion

on biocorridors (p. 64) addresses the need to identify and designate the connections between the Castle Rock State Park core area and other wildlands external to park lands. This discussion also addresses the need to establish baseline data and monitor the health and function of core areas and biocorridors as part of the park's resource management program.

(CEQA) 93. The Department will perform more in-depth traffic studies when more specific development plans are proposed.

The estimate of two trips per day per campsite is based on the assumption that either one party will leave and one will arrive each day or that if the campsite has a long-term stay, the party may leave and return to visit other parks in the area. An estimate of 4 trips per day per campsite was used for the Wilder Ranch General Plan Amendment; the higher trip generation reflects the type of camping (standard auto and RV sites) and the proximity of number of destinations (Santa Cruz, beaches, Boardwalk, and Wilder Ranch).

The Department will contact the Department of Transportation in the event there is need to perform any work in the highway right-of-way.

(MB) 94. *Please see response to item number 44.*

(RM) 95. The goal and guidelines on page 66 of the general plan, related to the protection and preservation of tafoni features, will be revised with the use of the word "will" instead of "should as is suggested. *Please see addendum for general plan text changes.*

(RM) (D-M) 96. It is not the intent of a general plan to provide detailed resource management programs and select specific mitigation measures. It does provide resource management objectives (pp. 57-58) and guidelines for more focused planning that occurs through management plans following the general plan approval. The CEQA process prior to project implementation addresses specific projects with potential impact to natural resources.

(RM) Please note that the plan addresses perpetuation of natural plant communities (pp. 60, 62) and the use of prescribed fire, which is necessary for knobcone pine regeneration. White Alder Riparian Forest is within the boundaries of the proposed natural preserve, and would be afforded greater protection with adoption of the general plan.

(CEQA) (A) 97. The CNPS is incorrect. CCR Section 15126.6 (e)(2) actually states, "If the environmentally superior project is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among other alternatives." The proposed project, wilderness and preservation alternatives, are environmentally superior to the no project alternative. CCR Section 15093 does not require the public agency to justify its selection of the proposed project over an environmentally superior alternative. The decision-maker is required to balance the benefits of the proposed project against its unavoidable environmental risks. As the CNPS has recognized, the Wilderness Priority and the Preservation Priority alternatives are environmentally superior to the proposed plan. The proposed plan was selected as better meeting the goals of

the Department and the unit by providing a wider range of recreational opportunities. A statement of overriding considerations, if necessary, is prepared with the notice of determination.

98. The CNPS does identify impacts (soil compaction, trampling of plants. etc.); however, CNPS has not provided any substantiation that these impacts will be significant as result of project implementation. Relocation of the parking and the addition of the walk-in camping at Partridge Farm could increase the use of the Castle Rock Ridge area; however, it has been observed that significant user impacts occur at the points of attraction, the rock outcroppings and are relatively independent of the distance from the parking lot. The Department expects that if the public entry point is relocated to Partridge Farm, a similar use pattern will continue. Public use of the Castle Rock Ridge area has occurred for some years, and existing user impacts appear significant only in the vicinity of the outcrops. A goal of the general plan was to reduce the existing impacts to the Castle Rock Ridge area. The Department anticipates a reduction of impacts with the development and implementation of the climbing management, trails, and vegetation management plans. In the Department's initial review, the impacts of project implementation were not considered significant. The EIR identified no unavoidable impacts from project implementation. Therefore, no mitigation measures were proposed.
99. *See Response to item number 98.* Additional mitigation measures associated with the development at Partridge Farm may be proposed with site specific planning for the area. We concur with the need for the adoption of a resource assessment program prior to actual development. Ecological studies were performed for the Partridge Farm area by Harvey & Stanley Associates, Inc. titled Partridge Farm – Boisseranc Unit, Castle Rock State Park, Resources Description and Guidelines. An inventory and analysis of the entire unit's resources has not been completed, but is not considered necessary, because many of the areas will not be affected by a change of use or facility development. While the CNPS believes that there is a potential for significant impacts, no supporting evidence is provided. The Department agrees that impacts may occur; however, based on observation of past use patterns and concentration of impacts, the impacts will not be significant to the black oak woodland. With the possible expansion of black oak woodland in the undeveloped portion of Partridge Farm and the reintroduction of fire through prescribed burning, the net impact will be beneficial. The Department does recognize that, even with planning and mitigation, unforeseen significant impacts may occur requiring relocation or removal of facilities. CNPS has indicated that DPR is unwilling to remove facilities where significant impacts occur. The Department has recently prepared and the Commission approved a General Plan for Pfeiffer Big Sur State Park which calls for the removal of a campground that is impacting an old growth redwood grove. The Department routinely removes or relocates campsites, trails, and other public use facilities where impacts have been subsequently found significant.

- (CEQA) (I) 100. The General Plan lacks the detail to make site-specific determinations of impacts or mitigation. For example, we cannot determine what vegetation will be removed for development of camping at Partridge Farm until an area development plan is prepared. Regardless, no black oaks will be

removed. At that time, the second tier of environmental analysis would occur and specific mitigation can be determined (i.e. replacement at 2:1 ratio). The General Plan does provide outlines or guidelines for mitigation measures. The California Native Plant Society states that “the preferred alternative fails to mitigate unavoidable ecological impacts to a less than significant level”. The Environmental Analysis Section found no significant unavoidable impacts, nor does the CNPS specify any unavoidable impacts.

A statement of overriding considerations is adopted with the approval of the project and the filing of the notice of determination. Section 15093 of the California Code of Regulations outlines the requirements for the statement of overriding considerations; the public agency may justify a decision using information in the FEIR and the public record.

- (CC) (NP) 101. *Please see response to item numbers 85 and 102.* The low use intensity category is considered a “roadless” area, which in this general plan is given special protection with the proposed natural preserve subclassification. Wildland areas outside the natural preserve are appropriately classified as moderate use intensity under the definition on page 71. These areas include unpaved roads and trails, and may include low-impact climbing activities.

The Black Oak Woodland is only included within the “low use intensity” and “moderate use intensity” categories. The high use intensity area circles shown on the Allowable Use Intensity diagram on page 73 are conceptual and depict a general location where new facilities would be considered. This plan would prohibit development other than trails in established Black Oak forest.

- (RM) 102. The natural preserve boundaries were delineated in such a manner to protect the sensitive resources of Castle Rock State Park, including Black Oak Woodland and Knobcone Pine Forest communities (see pp. 57-58, 60-61). The areas of Black Oak Woodland and Knobcone Pine Forest located outside of the delineated boundary of the proposed Natural Preserve will continue to have protective status by virtue of the State Park classification and the resource management philosophical approach that prioritizes natural process management over recreation management.

The boundary was also established to continue to provide high quality, non-destructive climbing and camping experiences at the park outside the natural preserve. Regarding the area west of the San Lorenzo River, the Department has a legal commitment with the county to maintain the quality and condition of the Saratoga Toll Road to ensure that it is suitable for passage of emergency vehicles where necessary for fire prevention and emergency response, which conflicts with the Natural Preserve subclassification. Also, vehicle access roads used for maintenance of high power transmission lines would be in conflict with this subclassification. Therefore, this area was excluded from the proposed Natural Preserve.

Please see response to item number 72.

- (W) 103. *Please see response to item number 2.*

(D-M) 104. *Please see response to item numbers 46 and 91.* On page 59, the general plan states that a comprehensive resource management program should be established for the management of natural processes and elements at Castle Rock State Park. The term “program” may include a management plan if determined necessary at a future time. The general plan outlines the intent of the Department, and the guidelines direct future park management toward attainment of the plan’s stated goals. However, detailed management plans, if included in the general plan, may not be the best method the Department would choose to address a problem in the future.

(RM) 105. Please refer to pgs. 60-61 of the Preliminary General Plan and the subsection entitled Special Plants and Communities. Any proposed future developments are subject to CEQA, and the Department will conduct surveys for sensitive species during appropriate seasons prior to any site-specific development. This is standard Department policy.

Several field surveys to compile a flora list for Castle Rock State Park were conducted during the spring and summer of 1996 and 1997. Special attention was focused on 14 special plant species identified by research as potentially occurring in the park. A single species, Brewer’s calandrinia, was located in the park.

(RM) 106. Dogtail grass is listed in the Appendix A of the Preliminary General Plan. Certainly this exotic grass is a component of the herbaceous understories of the Black Oak Woodlands. However, the degree of its adverse effects on the herbaceous understories is debatable. It is only one of several non-native and native species that comprise the herbaceous cover. More information on exotic species and Castle Rock plant communities is provided in the Resource Inventory for the park, which is on file at the Northern Service Center and the Santa Cruz District office. Expert opinion is divided as to the efficacy of burning in order to encourage a more native composition for grasslands and herbaceous understories of oak savannahs. Some feel that the seasonal timing of prescribed burning may be the determining factor in success of these burns, although the evidence is not currently conclusive. It is not the intent of a general plan to provide detailed resource management programs. More focused planning, such as prescribed fire management or exotic plant control, is developed, prepared, and implemented at the district level.

(NP) (W) 107. The Subclassification section within the Existing Conditions section will be amended to include or reference all categories of units that may be included within the boundaries of another unit of the State Park System.

(P) (F) 108. A visitor survey that was conducted early in the planning process and input from park management staff indicated that management of parking was one of the important issues to be addressed by the general plan. The parking issues included access locations, capacity, fees, potential resource impacts, and visitor safety. The three goals established for the Partridge Farm area evolved from these expressed concerns.

The present need, or demand, for off-highway parking is greater than the current capacity of the existing lot, unless visitor access and use are severely reduced

(as your proposal suggest they should be). The identified parking lot cannot and should not be expanded at this location, due to significant resource impacts. The parking considerations are not for expanding visitor use, but to accommodate cars currently parking along the highway. The existing interim parking lot was developed in a former meadow and natural drainage, at a time of limited state park ownership. Partridge was considered as having good potential for day use parking, if properly designed, and if emphasis was placed on protecting resources. The Partridge Farm area has sufficient size to establish buffers between facilities and sensitive resources. This area also has sufficient size to situate a park office for visitor contact, park orientation, and improved interpretation of resource values. As stated on page 91, in phase 2, "Parking would be removed from the existing parking lot, with no net increase in the overall day use parking capacity for this area." This describes the intentions of the Department. Parking alternatives are discussed, based on the outcomes of resource assessments and management of visitor impacts.

- (C) (P) 109. The general plan on pages 94 and 95 describes the guidelines and goal to "rehabilitate existing campsites and trails, and restore the primitive camping experience." The existing and proposed trail camps discussed in the general plan will provide an improved primitive camping experience. *Please see response to item number 1.*
- (G) The quality of visitor experience of the Lion Caves, Goat Rock, and the Black Oak Woodland can be measured differently by different people. For those people who are seeking wilderness, any increase in visitation will be noticed. For climbers, the quality of experience will be affected by the closure of some rocks for climbing, while this same action will enhance the experience for others interested in the geologic formations, flora, and fauna. Castle Rock State Park is currently affected by other disturbances such as two state highways, residential developments, a gun club, and rock climbing activities. Consequently, we do not considered this a wilderness experience.
- (RM) 110. On page 48 of the general plan, the first and second paragraphs will be deleted. This text will be revised and inserted in "The Plan" section, following the discussion of Allowable Use Intensity as follows:

MANAGING RESOURCES AND VISITOR IMPACTS

It is recognized that any recreational use produces at least some impact, and that the Department needs to manage visitor impacts. Also recognized is the importance of providing and maintaining diversity in resource features and conditions of the park.

Goal: Apply processes and methods of visitor impact analysis to minimize resources impacts and maintain appropriate types and levels of visitor use within this unit.

Guidelines: In accordance with the California Environmental Quality Act (CEQA), prior to site specific development or preparation of management plans, the area of potential impact will be surveyed and reviewed by appropriate personnel and responsible agencies.

Resource conditions will be assessed an appropriate actions taken to maintain acceptable conditions and manage use accordingly.

The reference to standards and stable systems has been deleted from the General Plan as indicated above. Standards for resources conditions and assessments may be established as part of management plans prepared at a later date. *Please see response to item number 31.*

- (W) 111. *Please see response to item numbers 1 and 173.*
- (RM) 112. It is fully expected that guidelines will be followed. *Please see response to item numbers 72 and 102.*
- (D-M) 113. A general plan sets the goals and provides guidelines to clarify intent and a desired outcome for various resource management proposals. It is not an implementation plan, and does not establish focused planning efforts for resource management. Addressing specific resource needs may require management plans, such as a prescribed burn plan. However, the detailed methodology for achieving the intended outcomes occurs at the district level. *Please see response to item number 104.*

Public review occurs when a Negative Declaration or Environmental Impact Report is required for future projects, which may include a management plan or proposed development project.

- (RM) 114. *Please see response to items number 46, 113, and 138.*

A general plan sets the goals and provides guidelines to clarify intent and a desired outcome for various resource management proposals. It is not an implementation plan, and does not establish resource management program priorities. The details for the methods of achieving the intended results are the product of future management planning that typically occurs at the district level.

- (RM) 115. Perpetuation of natural vegetation elements will generally provide the necessary habitat conditions for native fauna. The goals regarding wildlife management (p. 63) and biocorridors (p. 64) provide guidelines that iterate the necessary intent and direction for perpetuating native wildlife.

It is fully expected that guidelines will be followed. *Please see response to item number 72 regarding the use of "guidelines."*

- (RM) 116. The Department recognizes the importance of bioconnectivity and appropriately includes a goal and guidelines that reflect this importance. These guidelines recommend "the collection of baseline information and the monitoring of the health and function of core areas and biocorridors." The details for the methods of achieving the intended results are the product of future management planning that typically occurs at the district level.

In many cases the Department has no influence or legal empowerment to ensure how private lands adjoining parks are managed. Identification of connectivity across lands of private owners can create legal problems for the Department. Hence, the phrase, "whenever possible", is appropriate.

The CEQA process does not obligate the Department to address any significant ecological impacts on the Santa Cruz Mountains bioregion.

- (RM) 117. The dark skies will be identified as a significant natural resource on page 23 of the general plan as follows:

Dark Skies

Although not often recognized, dark skies are a significant natural resource, especially for the urban dweller seeking a place absent of light pollution sources so common in the metropolitan areas of the Santa Clara Valley to the east. Castle Rock State Park is a good location for viewing dark skies. The park's distance and orientation away from the city lights creates favorable conditions along Skyline Boulevard for this type of activity. Support facilities, such as parking and restrooms, and other developments can increase light pollution and require design considerations to minimize impacts.

- (RM) (I) Astronomy activities require vehicle access for loading and unloading telescopes, as well as parking and restroom facilities. This activity is currently accommodated at Partridge Farm by special use permit. A guideline exists on page 87 of the general plan that calls for consideration of astronomy activities in the future facility planning and designs. The lighting industry produces several types of lighting fixtures that reduce light pollution, and along with proper design can minimize the impacts from area lighting. Environmental impacts will be further evaluated at the time more specific development plans are proposed.

The description of visitors experiencing clear moonless nights is also mentioned in the Spirit of Place on page 3.

- (CC) 118. The general plan, on page 70, clearly states "The carrying capacity of land is understood here to mean a land's inherent ability to sustain over time both the integrity of its natural systems and the land uses dependent upon them." Furthermore, it defines categories of allowable use intensity that correlate the significance, sensitivities, and constraints of the unit's resources with an allowable degree of disturbance due to human impacts. The evaluations of resource constraints were partly derived from earlier analysis and mapping of soils, slope, vegetation, hydrology, wildlife habitats, seismic potential, and erosion potential. The impact on resources, resource management goals, and visitor perceptions and attitudes are interdependent components that were used to make determinations on carrying capacity or use intensity.

The discussion of carrying capacity and allowable use intensity is adequate for this goal-oriented general plan and first tier environmental review.

- (F) 119. The reference to the amount of additional trails projected for the park on page 74 will be deleted from the general plan. The Department determined it is unnecessary to include, since it does not indicate the actual or potential locations, length, or type of trail use, which would be the purpose of the future Trail's Plan. The 10 miles of trails mentioned in the general plan was a general estimate of the unit's trail potential, considering a possible loop-trail that could follow portions of the existing road at the southern end of the unit.

The general plan, on page 84, provides goals and guidelines for special protection of sensitive plant and wildlife habitats and geologic features. Included in these guidelines it is stated that "... limited trails should be designed to provide access in areas where they would have the least impact on wildlife habitat and ecological systems. Future trails development should be guided by a unitwide trails plan and directed by Departmental resource management and interpretive policies, whereby preservation and resource protection are considered the primary management philosophy in the area."

- (RG) 120. The Department's policy for concessions is stated on page 81 of the general plan. The general plan does not propose or anticipate concession facility development at Castle Rock State Park. However, the Department does support concession contracts as a legitimate means of providing visitor services and products. As stated in the general plan "specific proposals to contract for services will be considered on a case-by-case basis."

The guideline on page 81 will be deleted:

- ~~Mobile food units should be considered for providing contract services to visitors of Castle Rock State Park, when operated in appropriate parking lot locations.~~

- (RM) (NP) 121. *Please see response to item number 102.*

- (I) CEQA (RM) 122. *Please see response to item number 138.* The Department believes there is sufficient language in the Castle Rock State Park Preliminary General Plan for protection of sensitive ecological resources. The general plan sets goals and provides guidelines to clarify intent and a desired outcome for various resource management proposals and programs. It is not an implementation plan. The Department carries that out through the responsibility of the district. The Department is not going to provide a Revised Preliminary General Plan that expands the boundaries of CRSP; any plan indicating expanded boundaries of the unit could subject this Department to liability for inverse condemnation.

- (P) (D-M) 123. The general plan will not address issues related to how or when the plan will be implemented. The Department's future decisions to remove existing parking or establish new parking areas will follow other processes after the general plan is adopted. These processes involve interrelated components such as: funding, staffing, agency coordination, resource protection, site investigations, or preparation of management plans. *Please see response to item number 108.*

- (C) (W) 124. *Please see response to item numbers 1, 2, 49, and 109.* Castle Rock State Park will continue to provide opportunities for visitor experiences that are compatible with resource management objectives. The state park classification and proposed declaration of purpose, will remain as presented in the preliminary general plan.

- (CEQA) 125. The Department disagrees with the CNPS' opinion that the Preliminary General Plan is in violation of the California Environmental Quality Act.
- A. *Please see response to item number 97.*
 - B. CNPS has opined that the Preliminary General Plan (PGP) has failed to identify significant environmental impacts of the proposed project. The EIR for the General Plan focused on general impacts of the project implementation as part of the "tiering" approach. The Department is aware that additional impacts may be identified when specific projects are formulated; however, the identification of such impacts at this level of planning would be purely speculative. The CNPS has not provided any example or substantiation of those impacts that should be identified.
 - C. The CNPS has expressed the opinion that the PGP fails to mitigate to a less than significant level the unavoidable impacts associated with shifting the visitor impact to Partridge Farm. *Please see response to item number 98.*
- (RM) 126. The information in this appendix was derived from several sources, including published literature, San Jose State University, and local knowledgeable botanists. Both the Santa Clara and Santa Cruz Chapters of CNPS were contacted for their knowledge of the flora of Castle Rock State Park. DPR staff compiled a list of observed plant species from several field trips in 1996 and 1997. A comprehensive Plant Life inventory of Castle Rock State Park, including an extensive list of vascular plant species, is on file at the Northern Service Center and the Santa Cruz District office.
- (M) 127. Maps appearing in the general plan are prepared for long-range planning purposes. Map information was obtained from the United States Geological Society (USGS) 1998, 1997- 98 field investigations, 1963 and 1979 aerial photo surveys, and 1979 study by Harvey & Stanley Associates, Inc. titled Natural Resources Inventory of Castle Rock State Park and the Upper San Lorenzo River Basin (including constraint maps).
- (RM) (M) Detailed information, including references, is provided in the draft Natural Resource Inventories for Castle Rock State Park, which are on file at the Northern Service Center and the Santa Cruz District office. The scale of maps appears on the right side of each map. Department staff conducted numerous field trips in 1996 and 1997 to collect natural resource information and to verify and ground truth other data sources. Every delineated Ecological Unit was field checked by Department staff. The mapping scale necessarily limits the detail of mapped information. For example, an area of vegetation 10m X 10m would be mapped as an inclusion within the surrounding dominant vegetation type. However, if the small area of vegetation was a rare natural plant community, this would be noted. The derivation of ecological units and their application to natural processes and organisms is detailed in the Ecology Resource Inventory for the park. In short, the Ecological Unit boundaries for this park are primarily determined on the basis of watersheds and hydrologic processes.
- (RM) 128. You have corrected an oversight in our editing. The wording in the last sentence, paragraph 2, page 15, will be revised as follows:
"Although not as biologically ~~diverse~~ unique as ancient forests, these second growth communities provide valuable wildlife habitat."

(CEQA) (W) 129. The Preliminary General Plan provides generalized concepts and assessment of impacts. Subsequent planning, such as resource management plans and project plans, will provide greater detail necessary for a more complete evaluation and mitigation, as required through the California Environmental Quality Act processes. *Please see response to item number 2.*

(RM) 130. This paragraph was constructed to portray the historic land uses the park has been subjected to and provide general examples of some of the results these land use practices have on wildlife. Because the park does not have long term records in regards to wildlife composition, references were made to wildlife species that are documented for Santa Cruz County. References to blue grosbeaks and burrowing owls will be stricken from the paragraph. *Please see response to item number 131.*

(G) (P) 131. Page 16, paragraph 4 will be revised as follows:

Historic land use in the state park has included the introduction of a variety of disturbance factors that affect native wildlife populations. These include logging, tan-bark and firewood harvesting, poaching, hunting, trapping, highway and ~~residence~~ residential construction, agricultural conversion, ~~Native American~~ vegetation burning by Native Americans, wildfire prevention and suppression, and the introduction of exotic plants and animals. Volunteer habitat restoration projects have mitigated some of the past disturbances. The California grizzly bear, Mexican jaguar, California condor, ~~blue grosbeak and~~ coho salmon ~~and burrowing owl~~ no longer exist in ~~Santa Cruz County or have experienced significant population declines there~~ the vicinity of the park.

(D-M) 132. *Please see response to item number 131.*

(RM) 133. Forest stands are protected at Castle Rock State Park by virtue of the “State Park” classification. It is the intent of the Department to retain healthy stands of forested habitats at the park to serve as you suggest.

(RM) 134. A sentence will be added to the preamble of the Sensitive Animals section, page 17, that says: “See Appendix B, page 130, for a list of sensitive wildlife species that occur, or for which potential habitat exists within Castle Rock State Park.” The General Plan format provides for a summary of resources. The Resource Inventory for the park, which is an open document in terms of the need to continue to update information, provides or references species-specific information.

(RM) 135. *Please see response to item number 134.* Also refer to Appendix B in the general plan for a list of bird species.

(RM) (D-M) 136. Managing vegetation towards a natural condition with a minimum of disruption to natural processes means to manage the vegetation in such a manner that natural community and population dynamics will continue to function. A minimum disruption to natural processes may entail alternative methods of replicating natural processes, such as the use of prescribed fire to relieve the danger of wildfire while continuing the processes that fire drives.

Quantitative objectives and goals are necessary; however, the General Plan document is not meant to provide this detail. Resource Management Planning provides the details of how to achieve the broad goals of the General Plan.

- (I) The only plant community that could be considered sensitive in this area is the Black Oak Woodland, which is of local significance, but common statewide. A perceived significant impact from excessive numbers of visitors is exaggerated. While some impact from visitors is a possibility, it would not be significant. The real threat is a lack of regeneration due to several factors, including the loss of acorns and seedlings from wildlife consumption and a total suppression of fire in this community for at least the past 50 years. In many locations, replacement by Douglas-fir is an end result in the absence of periodic fires.
- (RM) 137. The goal presented on page 60, paragraph 2 states: "Preserve and perpetuate examples of natural plant communities, restore, protect, and maintain native ecosystems and indigenous flora and fauna." Native forests are inclusive under this goal. The resource management objectives for the various Resource Management Zones (pp. 57-58) reinforce this goal. *Please see response to item number 138 regarding setting quantitative targets.*
- (D-M) 138. The General Plan does not determine the details of how all goals will be achieved. How and when these are accomplished are determined by more detailed planning efforts.
- (CC) (D-M) 139. *Please see response to item number 70.* The Department agrees that further studies are needed to determine actual carrying capacities based on quantitative information and analysis. However, this is only a "general" plan as we intended, and not a detailed management plan as you suggest it should be.
- (RM) 140. It is the goal of the proposed Preliminary General Plan to protect and perpetuate native wildlife populations at the park (p. 63). Wildlife regulatory agencies have reviewed and commented on the Preliminary General Plan. These agencies have not indicated that there is anything proposed in the document that warrants endangered species consultation.
- (D-M) 141. The level of analysis was commensurate with the level of detail for the General Plan. The life of a general plan is supposedly about 20 years. During that time, the Department will be considering and implementing a variety of management and project plans for the unit. At the those times, the Department will be able to analyze more specific impacts to sensitive species and the status of some species could be better defined or recognized.
- (CEQA) 142. The Preservation Priority and Wilderness Classification Alternatives are ecologically superior to the proposed plan; however, they do not provide the same level of recreational or range of resource management opportunities as the proposed plan.
- (CEQA) 143. *Please see response to item number 97.*
- (G) 144. Thank you for your support of the proposed general plan and strong commitment to the future of Castle Rock State Park.

- (RC) 145. As a state park, protecting and preserving significant resources at Castle Rock is a primary goal of our Department. It is also a primary goal of this general plan. State parks also provide for public access and recreational opportunities. Climbing is considered a legitimate form of recreation (even in wilderness) if resources are protected and visitor activities can be managed such that resource impacts are kept within a desired range. The general plan calls for the preparation of a climbing management plan to determine how and where low-impact climbing can continue, with minimal impacts to resources. The process for preparing this management plan includes further scientific studies and environmental review. To protect the most significant resources in the park, a natural preserve is proposed in the general plan where all types of climbing would be prohibited. The general plan does not propose development for an ever increasing use of this state park. It attempts to improve the organization of administrative, public contact, and visitor support facilities, with expectations for improved management capabilities, resource conditions, and visitor enjoyment. Our Department's mission (or approach) is to manage for both "protection" and appropriate "use", and to prepare plans that define the relationship between these two goals for each State Park System unit.
- (M) 146. The Santa Clara County Parks Department states in their park's brochure that the Upper Stevens Creek County Park has mature stands of Douglas fir and redwoods.
- (S) 147. The reference to concerns about ranger staffing on page 10 of the General Plan will be changed to read "inadequate." Castle Rock State Park is allocated two full-time ranger positions. While one ranger has worked continuously at this unit since 1981, according to our records, the other position has been vacant a total of 17 months since 1984 due to staff changes. All rangers have additional responsibilities that require time away from their primary assignments, particularly associated with being a peace officer (e.g., defensive tactics, first responder, firearms qualification, POST legal requirements, and court appearances). Other voluntary duties include firearms instruction and inspection, union representation, and various types of training. Infrequently, perhaps once a month, a ranger is requested at another park for emergencies or specific staffing situations. These circumstances are typical for most field employees.
- (RM) 148. Even though this state park was established in 1968, the lands on which logging continued into the early 1970's occurred on private property before it was acquired by the State.
- (D-M) 149. Although the efforts of Tony Look and the Sempervirens Fund are much appreciated by the Department, it is not the function of the General Plan to provide a complete history of the unit. A more detailed history can be found in the unit Resource Inventory document.
- (RM) 150. The Lion Caves is temporarily closed to the "public", due to the resource damage and the lack of an authorized trail. The general plan includes the Lion Caves within the proposed natural preserve that would prohibit climbing activities, but still allow public access for interpretive purposes.

(I) 151. The general plan addresses this issue on pages 10 and 69. On page 37, gun range noise pollution will be added to the list of common issues with other agencies.

(MB) 152. *Please see response to items number 44 and 55.*

(RC) The Castle Rock Climbers Committee was established in December 1998, to assist the Department in preparing a Climbing Management Plan. This committee is reviewing for applicability other recent plans, such as Pinnacles National Monument and Joshua Tree National Park, and will determine additional research needs. All research and documents produced by this committee will be shared with other agencies.

(RM) 153. Introductory language will be added on page 62 which describes the benefits of fire under controlled, prescriptive conditions, but recognizes the dangers associated with wildfires occurring under conditions not within the control of park managers.

(M) (MB) 154. *Please see response to item number 152.* The general plan encourages this type of coordination between agencies to resolve issues of common interest, particularly in planning regional trails that connect state parks with county parks and MROSD open space preserves.

(S) 155. *Please see responses to items number 1, 18, and 74.* There most likely would not be a gate closure as is the practice at other camping facilities in California State Parks. Currently, the public can enter the park at various locations and hike to the two trail camps, although the turnouts are posted closed one-half hour after sunset. Visitors do not usually stray away from their campsites in the dark.

The campground would be year-round. Pets are allowed on leash in camping areas throughout State park units and are monitored by park staff and volunteers.

Use is anticipated for the proposed camping facility at Partridge Farm as visitors currently have to hike approximately two and one-half mile to the present Castle Rock Trail Camp (23 sites). The walk-in campsites will have easier accessibility and some enhanced amenities.

(S) 156. New facilities proposed are minimal and located in one area; hence, these facilities should not substantially increase requirements for additional staff.

(MB) 157. *Please see responses to items number 44 and 152.* As previously mentioned, the State's bicycle policy renders local decisions regarding the use of mountain bikes subject to the discretion of the District Superintendent.

(W) (DOP) 158. No comparisons exist between Sinkyone and Castle Rock, other than to point out their differences. Sinkyone is a larger state park (7,367 acres) with very different issues. The general plan and its declared purpose for Castle Rock SP ". . . is to preserve the outstanding natural resources, wildland values, and supporting ecosystems ... while providing opportunities for the visiting public

to enjoy and be inspired...”. The goals and guidelines of the general plan aim toward achieving both preservation and recreation objectives, within the parameters of the state park classification. This plan and its proposals are not based on a mandate to generate revenues.

- (W) 159. We prefer to be more descriptive than rely on terms such as wilderness, where the meaning often varies between individuals.
- (RC) 160. Areas such as the Castle Rock Ridge Resource Management Zone have been subjected to rock climbing for numerous years. cursory surveys of some “climbing rocks” during the inventory phase of this project showed evidence of use by wildlife, particularly rodents. Turkey vultures have been observed nesting in a small cave located near a climbing route. While this information suggests that some species do coexist with rock climbers, we do not have enough data to show the full extent of interactions, and it is likely that shy species may be precluded. The Climbing Management Plan currently being developed for the park will address the interactions of climbers and wildlife, and develop and implement strategies to conserve species. The goal of protecting significant resource values in relation to low-impact rock climbing is identified on page 89 of the Preliminary General Plan document.
- (RM) 161. Travertine Springs and its associated formations are identified as a significant natural resource of the Travertine Springs RMZ (Table 4, Page 58). The resource management objectives described for this RMZ include the protection of springs and seeps. *Please see response to item number 61.*
- (RM) 162. The Preliminary General Plan calls for the development of a Watershed Management Plan, which will identify specific management actions intended to achieve watershed management goals (page 59). The structures you refer to should be addressed under this proposed management plan.
- (I) 163. While there is considerable use of the trails near the main parking lot, the greatest user impacts occur at the points of attraction—the Falls, and the various rock formations. These attractions are already easily accessible from the existing main parking lot. Control measures at the site of impact should have more effect on the protection of resources than the location of the parking lot. The proximity of the Lion Caves to the proposed public access at Partridge Farm was of concern to the planning team; improved accessibility could lead to use impacts. The plan proposes to include the Lion Caves within the Natural Preserve boundaries, which would restrict some uses of the area. An authorized trail would be designed to control access into this area. Further, the use of Partridge Farm as a the primary visitor contact would enable the staff to more conveniently patrol the Lion Caves and educate the public to the sensitivity and need for protection of the Lion Caves area.
- (I) 164. The commentator is correct in noting that the issues of concern to this Department are primarily those that occur in the two-dimensional aspect. Those issues of a three-dimensional character were not considered as threatening. There are no known oil or mineral reserves in the immediate vicinity to constitute a viable threat. The noise impact from aircraft passing over the park is considerably less intrusive than that of the neighboring gun range, as has been

pointed out by the commentors. The impacts of air pollution are beyond the jurisdictional concerns of the Department.

- (G) 165. The Department's mission is to protect resources and provide recreational opportunities. *Please see response to item number 1.*
- (P) 166. Phasing is not mentioned on page 44, but is discussed on page 91 of the general plan. The general plan, on pages 86 - 92, also describes the goals and guidelines for Partridge and day-use parking development and future planning considerations during this transition period. The goals of the general plan are felt to be attainable, under favorable conditions and with mitigation of some potential impacts. While some development proposals may never be realized, there are benefits to the public even if two smaller parking lots result and roadside parking is removed off the highway shoulder. On page 91, the general plan states "... with no increase in overall day use parking capacity for this area."
- (G) (M) (I) 167. The multi-agency visitor center, as discussed on page 98, requires further study of alternative sites and programs, if the various agencies determine it desirable to pursue in the future. The Department considered the potential for a park headquarters office and primary visitor contact location at Saratoga Gap. However, this alternative was discounted due to the related impacts of long-term parking and traffic.
- (P) 168. The general plan's goals and guidelines on pages 90 - 92, recognize the visitor and operational needs for parking as an integrated system, and directs improvements to specific areas for specific needs. The general plan does propose the improvement of smaller roadside parking areas at trailhead locations, as you suggested. The day-use parking proposed for Partridge addresses the visitor access and parking needs for the Castle Rock Ridge area, as well. Off-highway parking is much easier and more efficient to manage than sporadic roadside parking. Partridge has a larger land base than any other location in the park, including the existing main parking lot. It would provide for the appropriate design and development of required parking facilities.
- (P) (M) 169. As stated in the guidelines on page 91, "Actions should be initiated through Caltrans for highway parking restrictions and access requirements in conjunction with plan development at Partridge Farm." Our Department is required to submit detailed drawings and obtain an encroachment permit from Caltrans prior to the construction of major public use facilities with access off the State Highway. Improved design requirements for access and egress off State Highway 35 will be coordinated with Caltrans when future detailed plans are prepared. The general plan does not go into this level of detailed planning and design.
- (C) 170. *Please see response to item number 1.*
- (I) Visitors should not feed the animals and should pack out everything they bring into the park. Also, visitors must use garbage containers when provided. Park managers are working with the industry to design tamper-proof containers and food storage systems for campgrounds and picnic areas. The least desirable alternative is to remove all people.

- (RC) 171. Rock climbing has been an ongoing activity at Castle Rock State Park since its establishment and does not represent a new, proposed use or impact. Particularly considering the current work being done at the national level in this regard, it appears appropriate to have a rock climbing committee research, analyze, evaluate, recommend, document and implement policies in conjunction with this park unit. *Please see responses to items number 51, 68, and 145.*
- (RM) “Appropriate personnel” can include, but is not limited to, Departments within the Resource Agency and Parks and Recreation headquarters, district, and sector staff, university students and professors, private consultants and volunteers, or other private citizens and organizations. It is difficult to determine who will be involved until the process is initiated.
- (I) California State Parks staff usually is in the best position to identify impacts or changing conditions, while park visitors, volunteers, and researchers may have occasion to notice a situation that warrants attention. The district’s resource ecologist and unit rangers primarily carry out these types of resource assessment programs. District personnel will provide data, analysis, and mitigation measures, with involvement by headquarters staff and consultation with other entities.
- (I) 172. The existing resource impacts are occurring as result of uncontrolled use - volunteer trails, improper (high impact) climbing, lack of public education of the rules and resource sensitivities, dispersed use without proper sanitation and waste removal, etc.
- (W) 173. The Declaration of Purpose (DOP) serves to recognize the significant resources to be protected and the opportunities for interpretation and the public’s enjoyment of these resource values. Our Department recognizes that some earlier DOPs were written in terms that were too general while others may have included terms such as “near wilderness” that could be interpreted differently, without clear definition. The interim DOP guided the initial acquisition and management of less than 600 acres. Subsequent acquisition added 3000 plus acres to the park with justification for its wide recreation potential and management of watersheds and critical habitat. In evaluating the earlier DOP, the Department determined that the DOP should not arbitrarily discount “improved” facilities in the future, and that the use of modern methods may better serve visitor needs. The general plan, on page 95, provides goals and guidelines to enhance the primitive camping experience, without using the Declaration of Purpose to unnecessarily restrict future opportunities.
- (I) (M) 174. The radio towers on Mt. Bielawski are not on state park property, therefore the Department has no authority to act upon their removal. However, the Department is concerned about the development of radio towers on Mt. Bielawski, as stated on page 42, and the guideline on page 68 directs the Department to work with adjoining jurisdictions regarding land use and development within the viewshed of the unit, which would include CDF and the towers.
- (RM) 175. The guidelines on page 67 indicate that measures will be taken to identify, record, and protect all significant historic and prehistoric sites and features. On-

going investigations will identify and record rock art sites in the park and determine their significance and the desired level of protection. The Department will consider different methods to be implemented in order to protect these resources. The method or selection of the specific mitigation measure is not within the scope of the general plan.

- (W) (MB) 176. The plan does not propose that the park be returned to a wilderness state, therefore it is an issue already covered by existing Department and Park Commission policy (see Appendix F). *Please see responses to items numbers 2, 44, and 55.*
- (G) 177. The magnetometer has not been ignored. It has a place in the Interpretive Prospectus, which more fully discusses interpretation for the park. However, we agree that it is important and will include it in the General Plan. The following guideline will be added on page 79 of the General Plan:

Guidelines for Magnetometer Site:

- It is recommended that the Magnetometer Site, near Castle Rock Trail Camp, be interpreted for its own value as well as the role Russell Varian, early proponent of the park, played in developing it.

- (C) 178. *Please see response to item number 1.*

- (D-M) The Department will prepare an overall site plan for the project area, prior to the construction of major facilities at Partridge Farm. Minor capitol outlay improvements and provisions for immediate public use can be accomplished without the required site plan. All development and changes in land uses are subject to an environmental review for the purposes of CEQA.

The general plan calls for a resource assessment, but it would be inappropriate for the general plan to determine how, when, and to what level it will be accomplished.

- (P) 179. There is no implication made by this statement that impacts will be the same. It only implies that the general plan would not increase the day use parking capacity or generate an increase in overall visitor attendance due to parking.
- (I) Site investigations and resource assessments do not necessarily constitute a *plan*. The term “should” in this general plan indicates the Department’s intent to take appropriate actions, without mandating specific plans that may or may not be appropriate at a future time of implementation.
- (P) 180. The goal stated for roadside parking on page 92 is unrelated to the development of Partridge.

The California Department of Forestry and Fire Protection personnel respond to medical emergencies in the park and utilize Partridge Farm as a helicopter-landing zone for medical evacuations. Development at Partridge Farm may

preclude the continued use of this area for this purpose. However, other locations will be evaluated that could provide a suitable replacement site for emergency evacuation.

- (C) 181. *Please see response to item number 1.*
- (I) 182. No mitigation is proposed for the presence of park vehicles at the trail camps because this is an existing condition. The relocation of the park headquarters to Partridge Farm would mitigate the impacts of this existing condition.
- (I) (G) 183. Due to the difference in elevation between the highway and Caltrans maintenance yard, construction of an entrance would be extremely difficult. The construction of a two-story parking structure would be prohibitively expensive particularly in view of the current level of use, and more so if public use is to be discouraged as some commentators have recommended. The northwest corner of the Saratoga Gap intersection was considered by the planning team for a park headquarters and visitor center, but was rejected due to the potential traffic congestion it could create at the intersection and the problems it would continue with the separation of the public access/parking area, headquarters, and visitor center. A visitor center with a park headquarters office at the northwest corner would require a larger parking area than the proposed multi-agency facility. Use of the Caltrans maintenance yard for parking was rejected due to the potential hazard of pedestrian crossings of the highway. In addition, CalTrans has recently withdrawn its intention to surplus or transfer their property. The multi-agency facility was seen as a center for the public to orient themselves to the recreational opportunities of the Santa Cruz Mountains. Stops there would be of short duration and parking requirements, therefore, would be small.
- (MB) 184. The general plan neither authorizes or restricts the use of mountain bikes in Castle Rock State Park. Mountain bike use is currently allowed only on the service road to the trail camp. The Department has an existing policy and process for making determinations regarding mountain bike use, and grants this authority to the District Superintendent (see Appendix F). The decision to allow mountain bike use is also subject to the requirements of the California Environmental Quality Act.
- (M) 185. The Department has no plans to acquire the Mount Bielawski property. If the Mount Bielawski property were offered for sale, the Department could investigate its potential as an addition to the unit. If the Department could acquire the property, existing easements, agreements, etc. for the communication equipment could preclude their removal.
- (P) (I) 186. Page 107 recognizes the potential safety and traffic hazard for public access and egress at Partridge Farm. A pedestrian crossing of Highway 35 to the Skyline Trail will need to be selected in view of the potential safety concerns.
- (I) (RM) 187. Two geologists were consulted during the planning effort to consider the impacts on the tafoni. A field trip was arranged with the planning team's resource ecologists. The conclusion reached was there was a greater and more immediate threat to the other natural resources (vegetation and soils).

Protection of those resources could lead to some protection of the tafoni. Further, the subclassification of a portion of the State Park as Natural Preserve would give greater protection to the tafoni within the preserve. The climbing management plan, should also provide for some protection of the tafoni in those areas outside of the proposed Natural Preserve.

Although of limited extent in the Santa Cruz Mountains, Black Oak Woodland (Black Oak Forest) is not considered a rare natural plant community as defined by the Department of Fish and Game. It is widely distributed throughout the state. The Lion Caves is not a plant community, but is included within the mapped Northern Mixed Chaparral vegetation type.

(CEQA) (I) 188. *Please see response to items number 72 and 110.* Department staff would develop thresholds of significance or initiate mitigation measures. As to the climbing impacts outside of the proposed Preserve, those lands are still classified as a State Park and subject to the protection of that classification. In an effort to mitigate the impacts of climbing, the Department has already started the preparation of a climbing management plan as is recommended in the Preliminary General Plan.

(W) 189. *Please see response to item numbers 1, 2, 21, and 183.* The use of "wilderness" in the name of the unit has led to confusion regarding the management directions and expectations on behalf of the public and other agencies in regards to Sinkyone Wilderness State Park. There appears to be no advantage to repeating the situation at Castle Rock State Park.

(W) (RM) 190. *Please see response to item numbers 2, 102, and 110.*

20 Coyote Hill
Portola Valley, CA 94028
March 15, 1999

California State Parks
Northern Service Center
1725 23rd Street, Suite 200
Sacramento, CA 95816

Re: Comments on Preliminary General Plan & Draft EIR

Dear Sir or Madam:

I write to strongly recommend the Wilderness Alternative, the Preservation Alternative, or a combination of the two.

(Although the present acreage of Castle Rock State Park is less than the 5,000 acres required for Wilderness designation, there is a high probability that additional acreage could be added in the future. And this park is a natural jewel which should not be restricted by numbers.)

My reasons for these Alternatives are these:

1. Castle Rock lies within ten miles of Saratoga, the gateway to the Santa Cruz Mountains and the Coast for all of the highly urbanized Silicon Valley. The pressures on this park have increased tremendously over the past years, with increased misuse by visitors. If camping is to be allowed off Highway 35 (and Highway 9), it would be a nightmare to supply adequate oversight by park personnel. To offer 20 campsites as a panacea for recreational demands from the huge surrounding population is but a drop in the bucket. There is ample camping in the surrounding area which requires a longer drive to reach and would not be impacted by the casual carfull looking for a quick place to hang out for the night! (Specifically, Memorial County Park, Butano State Park, and Big Basin State Park.)

Far better to let it be known that Castle Rock State Park offers a great opportunity for urban dwellers to spend the day. The greatest gift Castle Rock offers park visitors is the opportunity to visit an easily accessible natural wild area lying close to the urban scene.

2. Castle Rock - Walter

2. Although your report makes much of the high voltage power line, I have never noticed it with the years of visits I have made to the park. And yes, almost all of the Santa Cruz mountains were logged at one time, but for today's generations, few would know the difference. One has only to read the plant and wildlife lists in the Appendices to find ample evidence that your objection (1) under Evaluation is weak. It is evident from this reading that the imprint of man's work goes substantially unnoticed by the abundant diversity of flora and fauna.

2

Also, I cannot imagine controlled burning just to preserve the Knob Cone Pine. It would be virtually impossible to control such a burn in that thick dry forest of conifer and oak.

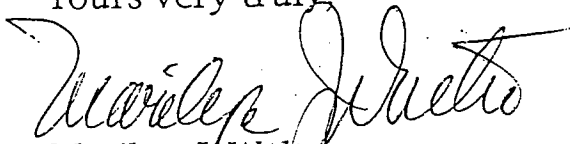
3

3. By not supplying abundant water and toilets and camping and concessions, visitors will be encouraged to tread lightly through this precious natural resource, to carry their own necessities, and leave only memories. And the State Park system will save on its resources too.

4

With so many areas of natural beauty being "used", the State of California would be making a strong statement for preservation of the wild for all future generations by choosing the Wilderness or Preservation Alternatives for Castle Rock State Park.

Yours very truly,



Marilyn J. Walter

San Mateo County Trails Advisory Committee
Coordinator, San Mateo County Group, Sierra Club
Town of Portola Valley Conservation Committee

RECEIVED
MAR 24 1999

DEAR STATE PARKS PERSONS:

3-23-99

re: Preliminary General Plan for Castle Rock
State Park

PLEASE LIMIT DEVELOPMENT OF PARTRIDGE
FARM AT CASTLE ROCK STATE PARK.

I AM ESPECIALLY CONCERNED ABOUT
SHOOTING STARS (CODECATHEON) GROWING
IN THE GULLY SW OF THE KIOSK.
THE TRAIL THAT RUNS THROUGH HERE
WILL APPARENTLY BE IMPROVED FOR **5**
MORE PAYING VISITORS WALKING FROM
THE OLD FARM TO THE RIDGE TRAIL.
MORE TRAFFIC MEANS MORE PEOPLE WHO
DON'T RESPECT SIGNS, BARRIERS -- OR
ANYTHING! HOW WILL THESE RARE
WILD FLOWERS BE PROTECTED?

I AM SADDENED BY MANY OF THE
STATE'S PROPOSALS FOR "HIGH USE
INTENSITY" AT CRSP.

Barbara Ciwell
(650) 465-0232



SOUTH SKYLINE ASSOCIATION

March 19, 1999

Northern Service Center
Department of Parks and Recreation
1725 23rd Street, Suite 200
Sacramento, CA 95816

RECEIVED
MAR 24 1999

The South Skyline Association represents more than 200 residents and owners in the Skyline area surrounding much of Castle Rock State Park. As neighbors, we have an intimate knowledge of the natural resources and usage patterns in the Park. Many of us are users of the Park ourselves. Some of us donate hours of volunteer labor to maintain and protect Park resources. Our two volunteer fire departments are frequently first at the scene of emergencies in the Park. All of us are impacted by the presence of large numbers of Park visitors. We are therefore submitting several questions as part of the CEQA review of the Draft General Plan.

Castle Rock State Park is greatly in need of planning; both the general planning currently underway and the more detailed management and protection plans that we anticipate will follow in short order. We are therefore gratified that the State Department of Parks and Recreation is taking this first step.

There are many aspects of the Draft Plan that we find encouraging and urge the Department to retain, specifically the following:

- The practice of acquiring additional land only from willing sellers.
- The creation of the large natural preserve within the Park, including the Lion Caves area and Kings Creek drainage.
- The elimination of rock climbing from the natural preserve.
- The importance of identifying, evaluating, and protecting resources and of educating the public about their fragile nature.
- The outreach to more moderate members of the climbing community to develop guidelines for climbing which protect the rocks and the resources associated with them.
- The maintenance of current policies restricting mountain bikes.
- The identification of access and parking problems, especially the review of roadside parking sites along Highways 9 and 35 for possible closure or enhancement.
- The coordination with adjacent private landowners and public agencies such as the San Lorenzo Valley Water District, Santa Clara County Parks, and the Midpeninsula Regional Open Space District. All these own vast acreage that is part of the same ecosystem and recreational area.

-The identification and proposed preservation of historical features.

-The attention to the layout and use of trails.

There are, however, some issues of great concern to us on which we request clarification of the Department's intentions.

1. Staffing. The general Plan, as a management document, makes many recommendations regarding management of natural preserves, visitor contact and education, enforcement of climbing guidelines, supervision of parking and camping areas, etc. Implementation will clearly require substantial expansion of current staffing. For example, during Phase I of the parking proposal there will be two "main" entrances. Today, with only one ranger, the Park is understaffed and its resources are widely acknowledged to be in a state of decline. If this situation continues, no plan will be able to reverse this degradation and stop the "rogue user" activity that is already taking place.

Questions regarding Staffing:

-How will the Department ensure that adequate funding will be available to provide sufficient numbers of rangers and other staff as the various recommendations in the Plan are implemented?

-How will Park resources be protected if funding is not available for adequate staffing?

-How will volunteers be utilized to supplement the staff?

2. Impact on Neighbors. The Park has a history of increasing impacts on its neighbors. Neighbors' homes have been broken into, water tanks drained, and residents harassed and occasionally threatened by Park visitors. These incidents are too frequently the result of people being excluded from the Park because of its restrictions on use of mountain bikes or on alcohol consumption. The easement through Indian Rock Ranch was especially troublesome until its use was reduced. The Plan document notes, however, that this "route is authorized for hikers and equestrians." Moreover, the Plan recommends several projects in close proximity to private residences such as a trail on future easements along the Kings Creek Truck Trail, the Partridge proposals, and the Environmental Living Program at Tin Can Ranch.

Questions regarding Impact on Neighbors:

-What measures will be taken to mitigate the impact of Park visitors on neighboring residents?

-How will locations for trails, parking, access points and other visitor amenities be chosen to minimize trespass and vandalism on neighboring properties?

-What management measures will be taken to minimize trespass and vandalism on neighboring properties?

-What use is intended for the easement through Indian Rock Ranch?

-What measures will be taken to ensure that developments and activities within the Park do not degrade neighboring residents' water supplies?

3. Baseline Resource Inventory and Carrying Capacity. In its discussion of carrying

6

7

capacity, the Plan suggests the collection of "baseline resource information," the "setting of standards," and the "establishment of resource monitoring" to determine carrying capacity and to prevent resource degradation from too much public use. We strongly support this recommendation and want to ensure that it is implemented in an effective and timely manner. Many feel strongly that serious resource degradation is already taking place. We could give many examples. One is that Tafoni fretwork has been irreparably destroyed in areas currently accessible to visitors. Moreover, it is seriously threatened in areas where rogue rock climbers are currently opening new access. An inventory of all Tafoni in the Park is urgently needed. Further, many of the rocks unique to the Castle Rock area have been denuded of lichen and moss through overuse by climbers.

Questions regarding Baseline Resource Inventory and Carrying Capacity:

- How will the Department ensure that a baseline resource information collection program is given high priority and is adequately funded?
- How will the data collection program work?
- How will limits of acceptable change be established?
- How will citizens participate in establishing the limits of acceptable change?
- How will ongoing monitoring programs work?
- How often will data be collected to determine if degradation has occurred?
- How will the results of the resource monitoring be used in the management of the Park?

4. Walk-in Camping. The Plan appropriately identifies a number of constraints on public access in the Partridge Farm area, including prehistoric sites, a unique black oak forest and the Lion Caves. Yet, walk-in camping, a new user activity, is proposed for this area. This camping would put the sensitive resources within a few minutes walk a full 24 hours every day. We are further concerned that the availability of overnight parking will make it even easier for illegal camping to occur outside the campground. Park neighbors among our members have had to deal with a number of illegal campfires over the years from such camping. We are opposed to the establishment of new walk-in camping.

Questions regarding Walk-in Camping:

- What data supports the need stated in the Plan for walk-in camping?
- How will the Department limit access by overnight campers to prehistoric sites, Lion Caves and other sensitive resources?
- Does the high cost of meeting the quality standards required for drinking water justify the benefit provided by the campsites?
- How will the department prevent use of the overnight parking areas for camping outside of designated areas?
- How will illegal campfires outside the campground be prevented?

-How will decisions be made about closing the walk-in camping during periods of high fire danger?

-How will sewage from the campground be disposed of?

5. Citizens Advisory Councils. We found the General Plan Citizens Advisory Committee to be extremely valuable and useful in our understanding the Department's needs and issues -- and as a vehicle for us to communicate our knowledge of Park resources and usage patterns. We are very disappointed about its discontinuance. We believe that input from people such as ourselves would be very helpful to the Department in preparing the best possible plans and in gaining public support for them.

Questions regarding Citizens Advisory Councils:

-How will the Department obtain public input from people like us as it proceeds with preparation of the numerous subsidiary plans mentioned in the General Plan?

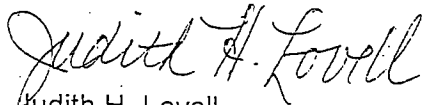
-Will citizens' advisory councils be established?

-How will we be able to influence the preparation and implementation of the use, development, and management plans?

10

Thank you for the opportunity to comment on the Plan. We look forward to your responses to our questions and to working with you in the future to refine the Plan.

Sincerely,



Judith H. Lovell
President
South Skyline Association

Dave, I consider this my final, but this is not my official submittal.

Stu

To: Dave Keck, Project Manager, Castle Rock Planning Team
3/22/99

From: Stu Langdoc

Subject: Comments on the Castle Rock State Park Preliminary General Plan
dated February 1999.

Thank you for a good, comprehensive plan. In general I believe that the plan is very appropriate in what it sets as goals for the park and the prioritization of preservation versus recreation enhancement; however I do have the following comments:

I appreciate, on behalf of myself as a climber and other climbers, the opportunity to work with the Department of Parks and Recreation in the development of the Climbing Management Plan for the park and for the provisions in the general plan for climbing, except as explained in the following 3 paragraphs. I also appreciate the proposed natural preserve and in general agree with the concept and the proposal. I also support the concept of using Partridge Farm as an entry, orientation, interpretation, and parking area for the Park.

I do ask that you consider permitting climbing on Ridge Trail Cliff. Even though it is in the proposed natural preserve, it seems inappropriate to ban climbing at this rock area which has direct access from both the Ridge and Saratoga Gap trails, requiring no climber access trails. This is a good, particularly accessible rock climbing resource with currently developed climbs, and considering the pressure of an increasing climber population, warrants serious consideration as a location at which climbing is permitted.

I understand the rationale for not permitting climbing in the natural preserve. I can think of no reasons under the present circumstances why it should be otherwise, but I must mention my nervousness about banning climbing totally from a majority of the park. Climbers, even the majority who wish to do the right thing by the park, are adventurous by nature, are interested in exploration, wild beauty, solitude, and a new climb. Perhaps "no impact climbing", really almost no impact climbing, about the same as hiking, could be considered for some areas of the park within the natural preserve.

On page 111 under ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED, 3rd paragraph. The statement in this paragraph about the unavoidable impacts of climbing appears to be inappropriate. The impacts associated with climbing as well as the impacts of other park users will occur whether or not the project is implemented, particularly in the area around

12

Castle Rock itself, which is very beat up, and not primarily from climbers. In addition, it is anticipated that a climbing management plan mandated by the guidelines for this project will help to avoid or mitigate much of the climbing impact. Please explain why implementation of this project will result in climbing and not hiking, picnicking or equestrian etc. impacts that cannot be avoided.

On page 46 in the 2nd paragraph, 2nd sentence consider inserting the word "increased" between "from"(3rd word) and "climbing".

13

On page 53 in the 1st paragraph of the "Declaration of Purpose" itself please consider adding "and Castle Rock Ridge" or similar after "upper watershed of the San Lorenzo River.". It seems conspicuous by its absence. I realize that parts of the ridge can be considered part of that watershed, but the ridge is a main feature of the park and parts of it are in other watersheds.

14

On page 66 first paragraph, consider deletion of the last 3 words "to the touch," or replacing it with "and can be damaged by touch." The words "are often very fragile to the touch" do not seem to mean anything very specific.

15

Generally: With due respect for the concept of providing additional statewide user access to CRSP, I am made very nervous at the thought of 20 campsites in the Partridge Farm area with the attendant overnight occupation of that area of the park. That would permit 24 hour occupation near already heavily impacted resources (Goat Rock and vicinity) and near the very impact sensitive Lion Caves. In addition, having these campsites in the area seems at odds with a need to maintain a "dark sky" for astronomers/star gazers and will impact the local animal communities. Specifically: Page 47 1st paragraph, last sentence under STATEWIDE CAMPING INTEREST AND LACK OF OVERNIGHT ACCOMMODATIONS states: "Currently, this opportunity exists only at other state park units, or in primitive backpacking trail camps at two locations in the park." This statement is not accurate, particularly when used to justify the addition of additional camping at Partridge farm because of a lack of overnight accommodations. The 23 trail camp sites located along the Saratoga Gap trail are not all that primitive, but rather are more like walk-in or car camping facilities. On page 35, 2nd paragraph 2nd, 3rd and 4th sentences it correctly states: "There are 23 hike-in campsites available; each has its own camp table and fire ring. Nearby

16

is a campfire center (50 people), two vaulted toilets and piped drinking water. A covered shelter, constructed by the Boy Scouts of America with donated materials, is available for camper's use during inclement weather; no reservations are required." On page 93 , OVERNIGHT USE FACILITIES, Partridge Farm, 1st paragraph, 1st sentence states "Castle Rock State Park has limited sites that would accommodate the development of overnight facilities, other than for primitive back-packing trail camps." Again, while literally true for new sites, this gives the incorrect impression that the existing 20 odd site trail camp on the Saratoga Gap Trail is more primitive than it is, rather than not very different from those proposed for Partridge Farm. These existing campsites will be much closer to the "roadhead" when there is parking at Partridge Farm, probably about 1.5 miles (30 to 45 minutes). Recognizing that some (about 3) of the sites will be removed because they are in ecologically sensitive locations please justify adding 20 more campsites to the park particularly when the 20 or so existing sites are, and will be, usable by visitors from outside the local region. On page 111, what is not listed under ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED are the impacts which must certainly occur when 20 campsites are introduced into the Partridge Farm area even if done very sensitively. How will you mitigate the effect of 24 hour human occupation on the animal communities, some of which are nocturnal and some of which are dusk and dawn feeders? These truly are ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED, as 24 hour occupation of this area is certainly a primary change created by this project. Please address this issue.

Along with my concern about campsites at Partridge Farm I believe that recreation enhancement should not be the 1st priority, as shown in Table 4 on page 57 under Resource Management Philosophical Approach (prioritized), but rather the last priority.

17

In spite of my expressed concerns, thank you for a good plan that, except for the above, I can support.

Stu Langdoc previously a member, Castle Rock State Park Advisory Committee

cc: Jan Anderson, Park Superintendent of the Mountain Parks Sector, Santa Cruz District, DPR

Dave Vincent, Superintendent, Santa Cruz District, DPR
Castle Rock Climbers Committee (CRCC)

To: Department of Parks and Recreation
Castle Rock State Park General Plan Team
Northern Service Center
1725 23rd St, Suite 200,
Sacramento, CA 95816
Attn: Dave Keck

From: Bo Gimbal
22424 Hwy 9
Boulder Creek, CA 95006
CloudHwyNine@compuserve.com

Subject: CRSP General Plan Draft and Environmental Analysis
Date: 3/21/99

RECEIVED
MAR 26 1999

As I wade through the latest General Plan, I am again awed by the wonderful job the Planning Team has done, I revisit some of the concerns that I have had for the last three years as a member of the Advisory Committee, and some new ones are emerging:

1. **Overview:** 90% of my concerns are well addressed in the Draft General Plan.
 - a. 5% of my concern would be satisfied had the staff recourse ecologist and biologist had a stronger voice in the Plan.
 - b. The other 5% is that the Plan should strongly mandate many resource protection issues, which it has deferred to local management discretion. Many items will surely fall through the cracks, given the problem of understaffing and time constraints.
2. **Staffing:** Still my most gnawing concern is the matter of staffing, because the implementation and success of all of the well-meaning proposals, guidelines, directives, and mandates of the Plan all hinges on increased staff level. More Rangers, aids, and volunteers are needed for:
 - a. Adhering to the resource safeguard guidelines, monitoring resources, interpretation/visitor contact, parking control, fire/safety, maintenance, and campground control.
 - b. Preparation of the so-called Unit Plans for Trails, Unit Plan for Climbing, Unit Plan for Fire Management, etc.
 - c. Determination of the Limits of Acceptable Change

---There is an iteration loop between budgets, staffing, and implementation.

Question: How can the General Plan make all its mandates and recommendations without addressing the issue of Staffing?

Question: Will any of the proposed new facilities development take place without increased staffing??

3. **Partridge Farm RMZ:** I am very much against the development of a Partridge Farm 20-Unit Walk-in Overnight Camp and its parking lot. I arrive at this viewpoint after consideration of the following background facts:

- a. Resident and migratory Fauna in the area are most active at dawn and dusk and some are nocturnal. Yet the General Plan proposes to have 24-hour presence of man at Partridge. Existing conditions are such that man is only a disturbance in the area from morning to just after sunset, then everything quiets down and the critters emerge. Most of the open meadow in the Park is in the Partridge Farm area. Chaparral, oak woodland, and some riparian habitats surround it. The ecotone edge where all of these habitats interface is very species rich and all of the surrounding fauna habitats are interdependent. In spite of this, the General Plan proposes to upset the ecological balance of the habitats by introducing manmade "improvements" and a 24-hour presence of man to the zone.

(3.a. Partridge Farm RMZ, 24-hour presence of man continued)

The IMPACT: Potentially Very Significant. IMPACT UNAVOIDABLE: Yes. No amount of money, planning, design changes, interpretive education or staffing can mitigate this impact to the level of non-significance.

b. Around-the-clock activities will drastically impact the other nearby natural resources outside the Partridge RMZ

b. The presence of the campground will increase duration of resource use, means more hours of wear-and-tear per visitor.

f. The campground will divert large amounts of the now very impacted ranger and maintenance staff time away from more important park operations now being neglected.

g. It's a one way street, once the decision is made, in spite of all the safeguards such as Limits of Acceptable Change, Phased Development, etc., after new facilities are built there is no going back to a simple, natural, Partridge Farm. Picture the scenario of all the infrastructure built in place then running into a budget crunch such as we have today.

Where would the priorities be, Resources or Campgrounds?

Question: Why has the significant impact on the various ecosystems surrounding Partridge Farm by the 24 hour presence of man at the walk-in campground, his autos, fires, food storage, noise pollution, detritus, etc., not been included on the list of pages 107-9 "SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT ".

19

Question: Why is there no mention of the mitigation of the effects of around the clock presence of man included in "MITIGATION MEASURES"?

20

4. Alternatives to the proposed project page 111: It seems one could easily imagine an alternative called (3) RESOURCE FIRST PRIORITY/ RECREATION SECOND PRIORITY by eliminating the Partridge walk-in campground but still including all the other carefully considered proposals of the Plan.

21

Question: Why are the only Alternatives proposed so "all or nothing" when there are realistic alternatives in the middle.

22

5. Trail Inventory: See page 137. The trail from the Hoe gate, at Summit Meadows trail, to the Toll Road is called Bay Laurel Trail is omitted from the list. It is an official hiking-equestrian trail, very good condition, well maintained, creates a loop.

23

6. New MPROSD acquisition: Midpen recently purchased the Gerdner property, Sec.8, adjoining Loughry Woods to the east. This should be added to the Maps.

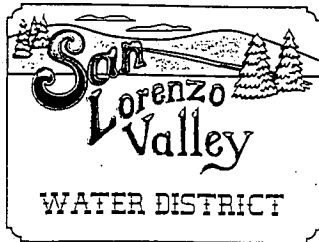
24

I shall be very interested in and edified by any answers to my questions you may have time to reply to. I seriously hope I have been helpful in the General Plan Process, it has been a great privilege to work with the Team.

Respectfully submitted,

Bo Gimbal





SAN LORENZO VALLEY WATER DISTRICT

13060 Highway 9 • Boulder Creek, CA 95006 • (408) 338-2153

March 23, 1999

Mr. Robert Ueltzen
California State Dept. of Parks and Recreation
Northern Service Center
1725 23rd St., Suite 200
Sacramento, CA 95816

RE: Castle Rock State Park Preliminary General Plan and Draft EIR

Dear Mr. Ueltzen:

Thank you for providing a copy of the Castle Rock State Park Preliminary General Plan and Draft EIR for our review and comment. Members of our Staff attended many of the public meetings held by State Parks to solicit input during the planning process. Our Board sent a letter in July 1997 commenting on the proposed General Plan. We are pleased to note the proposed plan incorporates our preferred alternative for the Natural Preserve. As we noted in our previous letter, the District has an ongoing long-term relationship with State Parks, having granted 10-year easements, without fee or compensation, for both the Saratoga Toll Road Trail across the District's Waterman Gap property and the Waterman Gap Trail Camp.

We are pleased to see that both water quality and aquatic habitat protection are featured in numerous policies throughout the plan. Both Castle Rock State Park and our Waterman Gap property constitute the upper watershed and several miles of the San Lorenzo River. Water quality in this reach of the San Lorenzo River has historically been of higher quality than segments downstream. We are pleased to see recognition in the plan of the role of poorly maintained trails and roads in accelerating erosion and fostering unnaturally high levels of sediment in the River. Excessive sediment loads are the single largest factor in the decline of both coho and steelhead populations in the San Lorenzo River.

Because the San Lorenzo River is listed by the State and U.S. Environmental Protection Agency as an impaired water body under the Clean Water Act, the Regional Water Quality Control Board and local agencies are cooperating in the development of TDML's (Total Daily Maximum Load) for sediment as required by Federal law. The proposed

Mr. Robert Ueltzen
March 23, 1999
Page Two

Trail and Road Management Plan, which is deferred in the Castle Rock General Plan, will subsequently come under the purview of the RWQCB TMDL for sediment, when adopted. By deferring the Trails and Roads Management Plan to a future date, will this preclude any assessment and active management of eroding roads and trails within Castle Rock State Park? We would like to be an active participant in any future planning activities for a Road and Trail Management Plan and the designation of new roads or trails, especially if they involve the District's Waterman Gap property.

25

The Board expressed concern about the ambitious nature of the plan with many proposed policies calling for additional study and a great deal of additional efforts to implement the plan. Given the current staffing levels at Castle Rock State Park and in the Santa Cruz Mountains District in general, we are concerned whether all of the necessary staffing, supervision, maintenance, and funding will be available to successfully implement the plan.

26

Again, thank you for the opportunity to comment on the Preliminary General Plan and Draft EIR for Castle Rock State Park.

Sincerely,



Merrilee Bolden
President, Board of Directors
San Lorenzo Valley Water District

MB:dc

March 1, 1999

Mr. Rob. Veltzen
CEQA Review Castle Rock S.P. General Plan

Dear Mr. Veltzen:

I have several comments concerning the Cultural Resources of the plan for Castle Rock State Park.

It is obvious that someone edited and rewrote the Euro-American history, which I originally prepared in late 1997. I have no problem with a re-write. What I do have a problem with is the fact that mistakes were made in editing the history.

I call to your attention the following points:

- A.P. 27. Concerning toll booths or station at Saratoga Gap. Besides Brewer's station, a second toll gate was established by the Carmichael and Hubbard Logging Company at about the same site as the Brewer station. It was located where the Carmichael and Hubbard road entered the Saratoga Road (or the intersection of the Saratoga Road with the Summit Ridge Road. The toll station was a financial failure. 27
- B. The Hubbard Brothers, of Carmichael + Hubbard Logging Company furnished the lumber and the space for the last Castle Rock school. The school was located at the west end of the Saratoga Gap parking lot.
- C. Pg 28 - paragraph concerning the Naval facility at the Soghy Property + Soghy State Forest. The sentence explaining

explaining the operation of the naval station is garbled. The station at the high point of Summit Ridge did not conduct "submarine patrols". It was a relay station for radio communication and should read: "the station on Summit Ridge relayed radio signals from airborne anti-submarine patrols to the facility at Moffett Naval Air Station." (or some sort of structure like appears here).

The Air Forces has "fields"; the Navy operates "Air Stations." "Moffett Field" is the old term when the U.S. Army Air Corps operated the base in the late 1930s.

P. 28, 4th Complete paragraph has a conflict in terms. In the late 1800s, the public was not experiencing "the beauty of a rejuvenating landscape". The upper San Lorenzo Valley must have appeared as a battlefield, ripped, torn and nearly treeless. It was warred, a moonscape of torn earth and stumps. Hikers could admire long vistas - almost barren of trees. So, my point, "marred" conflicts with "rejuvenating landscape". I think you need a rewrite.

P. 29, Line 9 of 3rd full paragraph - has a spelling error word should be in - not "is". "Trees in both orchards..."

Otherwise, a very good General Plan.

Sincerely

George A. Stammerjohn

oppps - one more page.

E. Rob

P.S. The Loghry house was ~~intentional~~ identified during one of the last visits I made to the unit. The house is located below the gate to the U.S. Naval facility. It is a small square pad - with a cement pillar, made in a nail keg as a form, at the rear left corner of the house. The house was closed by the Loghry's son in 1965 and it appeared from evidence on the ground that the house was burned. To the left was a 2 level recreation room with a home-made fire place, now covered with green mold and moss.

This point, or site, should be added to the paragraph on cabin and house sites located within the boundaries of the unit and noted in the cultural resource section of the plan.

There are also what appears as 4 trailer pads located further to the left of the stone fire place. These pads were probably part of the living quarters for navy personnel at the facility.

Best,

George.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Sacramento Fish and Wildlife Office
3310 El Camino Avenue, Suite 130
Sacramento, California 95821-6340

IN REPLY REFER TO:
1-1-99-TA-940

March 23, 1999

Mr. Robert Ueltzen
Northern Service Center
Department of Parks and Recreation
1725 23rd Street
Suite 200
Sacramento, California 95816

Subject: Species List and Comments for Castle Rock State Park Preliminary
General Plan, San Mateo, Santa Clara and Santa Cruz Counties,
California

Dear Mr. Ueltzen,

We are writing in response to your March 1, 1999, request for information about endangered and threatened species (Enclosure A). The enclosed list covers the following U.S. Geological Survey 7½ minute quad or quads: Castle Rock Ridge and Big Basin Quads.

Please read *Important Information About Your Species List* (enclosed). It explains how we made the list and describes your responsibilities under the Endangered Species Act. Please contact Harry Mossman, Biological Technician, at (916) 979-2753, if you have any questions about the attached list.

We have a few brief questions and comments on portions of the plan:

-- Exotic animals are discussed on page 16. We suggest that this discussion include the bullfrog. Do bullfrogs occur in the park? **28**

-- Under Wildlife Management, page 63, it would be appropriate to add a goal and guideline(s) to control or eradicate harmful exotic animal populations in the park, comparable to the exotic plant goal on page 61. **29**

-- We recommend the plan call for field surveys for sensitive habitats, such as serpentine soils, and sensitive species, such as California red-legged frogs, within the park. Serpentine outcrops are not always mapped at the level of regional soil surveys, and are especially likely to support **30**

Mr. Robert Ueltzen

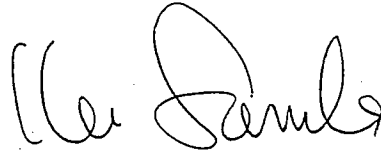
2

unique biological communities and species. The bald areas and chaparral areas would be likely places to look for these unusual soils:

-- Ideally, sensitive habitat and population areas mapped in the park would be monitored on a regular basis, and a baseline of data maintained, so that monitoring results could be used to guide resource protection or management actions.

Thank you for providing us with the opportunity to review this thoughtful plan. If you have questions regarding these comments please contact David Wright at (916) 979-2752.

Sincerely,



for Cay C. Goude
Acting Field Supervisor

Enclosures

cc: Ventura Fish & Wildlife Office, Ventura, CA

31

Important Information About Your Species List

How We Make Species Lists

We store information about endangered and threatened species lists by U.S. Geological Survey 7½ minute *quads*. The United States is divided into these quads, which are about the size of San Francisco. If you requested your list by quad name or number, that is what we used. Otherwise, we used the information you sent us to determine which quad or quads to use.

Animals

The animals on your species list are ones that occur within, *or may be affected by projects within*, the quads covered by the list. Fish and other aquatic species appear on your list if they are in the same watershed as your quad or if water use in your quad might affect them.

Plants

Any plants on your list are ones *that have actually been observed* in the quad or quads covered by the list. We have also included either a county species list or a list of species in nearby quads. We recommend that you check your project area for these plants. Plants may exist in an area without ever having been detected there.

Surveying

Some of the species on your list may not be affected by your project. A trained biologist or botanist, familiar with the habitat requirements of the species on your list, should determine whether they or habitats suitable for them may be affected by your project. We recommend that your surveys include any proposed and candidate species on your list. For plant surveys, we recommend using the enclosed *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Species*. The results of your surveys should be published in any environmental documents prepared for your project.

State-Listed Species

Species listed as threatened or endangered by the California Department of Fish and Game do not appear on your species list unless they have also been listed by us or by the National Marine Fisheries Service. Call (916) 322-2493 or write Marketing Manager, California Department of Fish and Game, Natural Diversity Data Base, 1416 Ninth Street, Sacramento, California 95814 for information about state-listed species.

Your Responsibilities Under the Endangered Species Act

All plants and animals identified as *listed* on Enclosure A are fully protected under the Endangered Species Act of 1973, as amended. Section 9 of the Act and its implementing regulations prohibit the *take* of a federally listed wildlife species. Take is defined by the Act as "to harass, harm, pursue, hunt,

shoot, wound, kill, trap, capture, or collect" any such animal. Take may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or shelter (50 CFR §17.3).

Take incidental to an otherwise lawful activity may be authorized by one of two procedures:

If a Federal agency is involved with the permitting, funding, or carrying out of a project that may result in take, then that agency must engage in a *formal consultation* with the Service. Such consultation would result in a *biological opinion* addressing the anticipated effect of the project on listed and proposed species. The opinion may authorize a limited level of incidental take.

If a Federal agency is not involved with the project, and federally listed species may be taken as part of the project, then you, the applicant, should apply for an *incidental take permit*. The Service may issue such a permit if you submit a satisfactory conservation plan for the species that would be affected by your project. Should your survey determine that federally listed or proposed species occur in the area and are likely to be affected by the project, we recommend that you work with this office and the California Department of Fish and Game to develop a plan that mitigates for the project's direct and indirect impacts to listed species and compensates for project-related loss of habitat. You should include the mitigation plan in any environmental documents you file.

Critical Habitat

When a species is listed as endangered or threatened, areas of habitat considered essential to its conservation may be designated as *critical habitat*. These areas may require special management considerations or protection. They provide needed space for growth and normal behavior; food, water, air, light, other nutritional or physiological requirements; cover or shelter; and sites for breeding, reproduction, rearing of offspring, germination or seed dispersal.

Although critical habitat may be designated on private or State lands, activities on these lands are not restricted unless there is Federal involvement in the activities or direct harm to listed wildlife.

If any species has proposed or designated critical habitat within a quad, there will be a separate line for this on the species list. Maps and boundary descriptions of the critical habitat may be found in the *Federal Register*. The information is also reprinted in the *Code of Federal Regulations* (50 CFR 17.95).

Candidate Species

We recommend that you address impacts to *candidate* species. We put plants and animals on our candidate list when we have enough scientific information to eventually propose them for listing as threatened or endangered. By considering these species early in your planning process you may be able to avoid the problems that could develop if one of these candidates was listed before the end of your project.

Your list may contain a section called *Species of Concern*. This term includes former *category 2 candidate species* and other plants and animals of concern to the Service and other Federal, State and private conservation agencies and organizations. Some of these species may become candidate species in the future.

Wetlands

If your project will impact wetlands, riparian habitat, or other jurisdictional waters as defined by section 404 of the Clean Water Act and/or section 10 of the Rivers and Harbors Act, you will need to obtain a permit from the U.S. Army Corps of Engineers. Impacts to wetland habitats require site specific mitigation and monitoring. For questions regarding wetlands, please contact Mark Littlefield of this office at (916) 979-2113.

Updates

Our database is constantly updated as species are proposed, listed and delisted. If you address proposed, candidate and special concern species in your planning, this should not be a problem. We also continually strive to make our information as accurate as possible. Sometimes we learn that a particular species has a different range than we thought. This should not be a problem if you consider the species on the county or surrounding-quad lists that we have enclosed. If you have a long-term project or if your project is delayed, please feel free to contact us about getting a current list. You can also find out the current status of a species by going to the Service's Internet page: www.fws.gov

GUIDELINES FOR CONDUCTING AND REPORTING BOTANICAL INVENTORIES
FOR FEDERALLY LISTED, PROPOSED AND CANDIDATE PLANTS
(September 23, 1996)

These guidelines describe protocols for conducting botanical inventories for federally listed, proposed and candidate plants, and describe minimum standards for reporting results. The Service will use, in part, the information outlined below in determining whether the project under consideration may affect any listed, proposed or candidate plants, and in determining the direct, indirect, and cumulative effects.

Field inventories should be conducted in a manner that will locate listed, proposed, or candidate species (target species) that may be present. The entire project area requires a botanical inventory, except developed agricultural lands. The field investigator(s) should:

1. Conduct inventories at the appropriate times of year when target species are present and identifiable. Inventories will include all potential habitats. Multiple site visits during a field season may be necessary to make observations during the appropriate phenological stage of all target species.
2. If available, use a regional or local reference population to obtain a visual image of the target species and associated habitat(s). If access to reference populations is not available, investigators should study specimens from local herbaria.
3. List every species observed and compile a comprehensive list of vascular plants for the entire project site. Vascular plants need to be identified to a taxonomic level which allows rarity to be determined.
4. Report results of botanical field inventories that include:
 - a. a description of the biological setting, including plant community, topography, soils, potential habitat of target species, and an evaluation of environmental conditions, such as timing or quantity of rainfall, which may influence the performance and expression of target species.
 - b. a map of project location showing scale, orientation, project boundaries, parcel size, and map quadrangle name.
 - c. survey dates and survey methodology(ies).
 - d. if a reference population is available, provide a written narrative describing the target species reference population(s) used, and date(s) when observations were made.
 - e. a comprehensive list of all vascular plants occurring on the project site for each habitat type.
 - f. current and historic land uses of the habitat(s) and degree of site alteration.
 - g. presence of target species off-site on adjacent parcels, if known.

- h. an assessment of the biological significance or ecological quality of the project site in a local and regional context.
5. If target species is(are) found, report results that additionally include:
 - a. a map showing federally listed, proposed and candidate species distribution as they relate to the proposed project.
 - b. if target species is (are) associated with wetlands, a description of the direction and integrity of flow of surface hydrology. If target species is (are) affected by adjacent off-site hydrological influences, describe these factors.
 - c. the target species phenology and microhabitat, an estimate of the number of individuals of each target species per unit area; identify areas of high, medium and low density of target species over the project site, and provide acres of occupied habitat of target species. Investigators could provide color slides, photos or color copies of photos of target species or representative habitats to support information or descriptions contained in reports.
 - d. the degree of impact(s), if any, of the proposed project as it relates to the potential unoccupied habitat of target habitat.
6. Document findings of target species by completing California Native Species Field Survey Form(s) and submit form(s) to the Natural Diversity Data Base. Documentation of determinations and/or voucher specimens may be useful in cases of taxonomic ambiguities, habitat or range extensions.
7. Report as an addendum to the original survey, any change in abundance and distribution of target plants in subsequent years. Project sites with inventories older than three years from the current date of project proposal submission will likely need additional survey. Investigators need to assess whether an additional survey(s) is (are) needed.
8. Adverse conditions may prevent investigator(s) from determining presence or identifying some target species in potential habitat(s) of target species. Disease, drought, predation, or herbivory may preclude the presence or identification of target species in any year. An additional botanical inventory(ies) in a subsequent year(s) may be required if adverse conditions occur in a potential habitat(s). Investigator(s) may need to discuss such conditions.
9. Guidance from California Department of Fish and Game (CDFG) regarding plant and plant community surveys can be found in Guidelines for Assessing the Effects of Proposed Developments on Rare and Endangered Plants and Plant Communities, 1984. Please contact the CDFG Regional Office for questions regarding the CDFG guidelines and for assistance in determining any applicable State regulatory requirements.

Endangered and Threatened Species that May Occur in or be
Affected by Projects in the Selected Quads Listed Below
(Any designated or proposed critical habitats will be shown on separate lines)
March 22, 1999

QUAD : 408A CASTLE ROCK RIDGE

Listed Species

Birds

- American peregrine falcon, *Falco peregrinus anatum* (E)
- marbled murrelet, *Brachyramphus marmoratus* (T)
- marbled murrelet critical habitat, *Brachyramphus marmoratus* (T)
- bald eagle, *Haliaeetus leucocephalus* (T)

Amphibians

- California red-legged frog, *Rana aurora draytonii* (T)

Fish

- tidewater goby, *Eucyclogobius newberryi* (E)
- delta smelt, *Hypomesus transpacificus* (T)
- coho salmon - central CA coast, *Oncorhynchus kisutch* (T)
- Central California steelhead, *Oncorhynchus mykiss* (T)
- Sacramento splittail, *Pogonichthys macrolepidotus* (T)

Invertebrates

- bay checkerspot butterfly, *Euphydryas editha bayensis* (T)

Plants

- Ben Lomond spineflower, *Chorizanthe pungens var. hartwegiana* (E) ?
- white-rayed pentachaeta, *Pentachaeta bellidiflora* (E) *

Candidate Species

Amphibians

- California tiger salamander, *Ambystoma californiense* (C)

Species of Concern

Mammals

- Pacific western big-eared bat, *Corynorhinus (=Plecotus) townsendii townsendii* (SC)

QUAD : 408A CASTLE ROCK RIDGE

Species of Concern

Mammals

- greater western mastiff-bat, *Eumops perotis californicus* (SC)
- long-eared myotis bat, *Myotis evotis* (SC)
- fringed myotis bat, *Myotis thysanodes* (SC)
- long-legged myotis bat, *Myotis volans* (SC)
- Yuma myotis bat, *Myotis yumanensis* (SC)
- San Francisco dusky-footed woodrat, *Neotoma fuscipes annectens* (SC)

Birds

- tricolored blackbird, *Agelaius tricolor* (SC)
- Bell's sage sparrow, *Amphispiza belli belli* (SC)
- ferruginous hawk, *Buteo regalis* (SC)

Reptiles

- silvery legless lizard, *Anniella pulchra pulchra* (SC)
- southwestern pond turtle, *Clemmys marmorata pallida* (SC)
- California horned lizard, *Phrynosoma coronatum frontale* (SC)

Amphibians

- foothill yellow-legged frog, *Rana boylei* (SC)

Fish

- Pacific lamprey, *Lampetra tridentata* (SC)
- longfin smelt, *Spirinchus thaleichthys* (SC)

Invertebrates

- Opler's longhorn moth, *Adela oplerella* (SC)
- Ricksecker's water scavenger beetle, *Hydrochara rickseckeri* (SC)
- unsilvered fritillary butterfly, *Speyeria adiate adiate* (SC)

Plants

- silver-leaved manzanita, *Arctostaphylos silvicola* (SC)
- South Bay clarkia, *Clarkia concinna* ssp. *automixa* (SC)

QUAD : 408B BIG BASIN

Listed Species

Birds

- American peregrine falcon, *Falco peregrinus anatum* (E)
- marbled murrelet, *Brachyramphus marmoratus* (T)
- marbled murrelet critical habitat, *Brachyramphus marmoratus* (T)
- bald eagle, *Haliaeetus leucocephalus* (T)

Amphibians

- California red-legged frog, *Rana aurora draytonii* (T)

Fish

- tidewater goby, *Eucyclogobius newberryi* (E)
- delta smelt, *Hypomesus transpacificus* (T)
- coho salmon - central CA coast, *Oncorhynchus kisutch* (T)
- Sacramento splittail, *Pogonichthys macrolepidotus* (T)

Plants

- Ben Lomond spineflower, *Chorizanthe pungens var. hartwegiana* (E)
- Santa Cruz cypress, *Cupressus abramsiana* (E)
- white-rayed pentachaeta, *Pentachaeta bellidiflora* (E) *

Candidate Species

Amphibians

- California tiger salamander, *Ambystoma californiense* (C)

Species of Concern

Mammals

- Pacific western big-eared bat, *Corynorhinus (=Plecotus) townsendii townsendii* (SC)
- greater western mastiff-bat, *Eumops perotis californicus* (SC)
- long-eared myotis bat, *Myotis evotis* (SC)
- fringed myotis bat, *Myotis thysanodes* (SC)
- long-legged myotis bat, *Myotis volans* (SC)
- Yuma myotis bat, *Myotis yumanensis* (SC)
- San Francisco dusky-footed woodrat, *Neotoma fuscipes annectens* (SC)

QUAD : 408B BIG BASIN

Species of Concern

Birds

- tricolored blackbird, *Agelaius tricolor* (SC)
- Bell's sage sparrow, *Amphispiza belli belli* (SC)
- ferruginous hawk, *Buteo regalis* (SC)

Reptiles

- southwestern pond turtle, *Clemmys marmorata pallida* (SC)
- California horned lizard, *Phrynosoma coronatum frontale* (SC)

Amphibians

- foothill yellow-legged frog, *Rana boylei* (SC)

Fish

- Pacific lamprey, *Lampetra tridentata* (SC)
- longfin smelt, *Spirinchus thaleichthys* (SC)

Invertebrates

- sandy beach tiger beetle, *Cicindela hirticollis gravida* (SC)
- Ricksecker's water scavenger beetle, *Hydrochara rickseckeri* (SC)
- unsilvered fritillary butterfly, *Speyeria adiastra adiastra* (SC)

Plants

- Schreiber's manzanita, *Arctostaphylos glutinosa* (SC)
- silver-leaved manzanita, *Arctostaphylos silvicola* (SC)
- Santa Cruz microseris, *Microseris decipiens* (SC)
- Gairdner's yampah, *Perideridia gairdneri* ssp. *gairdneri* (SC)
- Mission Delores campion, *Silene verecunda* ssp. *verecunda* (SC)

KEY:

- | | | |
|------|---------------------------|---|
| (E) | <i>Endangered</i> | Listed (in the Federal Register) as being in danger of extinction. |
| (T) | <i>Threatened</i> | Listed as likely to become endangered within the foreseeable future. |
| (P) | <i>Proposed</i> | Officially proposed (in the Federal Register) for listing as endangered or threatened. |
| (C) | <i>Candidate</i> | Candidate to become a <i>proposed</i> species. |
| (SC) | <i>Species of Concern</i> | May be endangered or threatened. Not enough biological information has been gathered to support listing at this time. |
| (*) | | Possibly extinct. |
| | <i>Critical Habitat</i> | Area essential to the conservation of a species. |

April 12, 1999

California Dept. of Parks & Recreation
Castle Rock State Park Planning Team
Northern Service Sector
1725 23rd Street, Ste. 200
Sacramento, CA 95816

Re: Public Comment on CEQA Draft

Ladies and Gentlemen:

This shall serve as my comments on the draft CEQA general plan for Castle Rock State Park.

I am a heavy user of this park, exclusively for hiking purposes. I support leaving this park as undeveloped as possible, in order to protect the qualities that draw me to this park. I live in San Jose, and consider this park to be one of the finest wilderness experiences readily available to an urbanite like me. Given its proximity to over 4 million Bay Area residents, who can use it on a "day use" basis, there is no need to facilitate camping at this park. It should be reserved for hikers and wildlife.

I object to the portions of the plan that provide for construction of additional parking at Partridge Farm. This is an ecologically delicate area that should remain as pristine as possible. Any further development here is in direct contradiction of the stated goal of protecting ecological resources.

32

If parking needs to be revised, I would propose posting of no parking signs outside of the current parking area on Skyline, plus construction of a new lot across from Mt. Bielowskie, at the Saratoga Gap trail access on the other side of the road. Day users could cross the street to access the park.

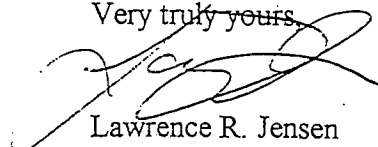
33

I object to construction of any campsites at this park. This park is already heavily used by day hikers. It does not need to be burdened with campers. The only camping I would possibly agree to would be in "backpacker only" locations, inaccessible to automobiles and recreational vehicles.

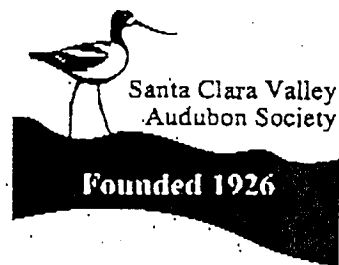
34

I think that the plan should be strengthened in order to forestall further increases in usage of this park.

Very truly yours,



Lawrence R. Jensen
681 N. 18th St.
San Jose, CA 95112



April 14, 1999

David Keck
Northern Service Center
California Department of Parks and Recreation
1725 23rd Street, Suite 200
Sacramento, CA 95816

RE: Castle Rock State Park Preliminary General Plan and Draft EIR

Dear Mr. Keck,

I do have a number of questions and comments regarding the Castle Rock State Park (CRSP) Preliminary General Plan and Draft EIR. They are summarized below.

One of my main concerns having to do with this document is the incorrect interpretation of State Code 5019.68, the criteria for classification of state lands as state wilderness. There is some leeway for interpretation in these criteria, and for some reason DPR insists upon an interpretation in which CRSP does not meet the criteria for classification as State Wilderness. This issue is critical to the future of CRSP, why not give the benefit of doubt to the interpretation that yields the greatest environmental protection for this ecologically very important land. This would be more consistent with DPR's mission. A detailed analysis of this issue should be done with the goal of finding a classification that yields the best protections possible of the native ecosystems in this park. Here is my short analysis of the issue:

1) "Appears to have generally been affected by the forces of nature with the imprint of man's work substantially unnoticeable". In the vast majority of the park, from the visitor's point of view I would say that the imprint of human activity is substantially unnoticeable. In an earlier passage, the code clarifies this by saying a state wilderness should be, "an area of relatively undeveloped state-owned or leased land which has retained its primeval character and influence or has been substantially restored to a near-natural appearance without permanent improvements or human habitation, other than semi-improved campgrounds and structures which existed at the time of classification of the area as a state wilderness." CRSP was logged in the 1800's but has now been substantially restored to a near-natural appearance.

2) "Has outstanding opportunities for solitude or a primitive and unconfined type of recreation". I don't believe this criterion is in dispute.

3) "Consists of at least 5,000 acres of land either by itself or in combination with contiguous areas possessing wilderness characteristics, or is of sufficient size as to make practicable its preservation and use in an unimpaired condition". In combination with MidPen Open Spaces this criteria is fulfilled. Nearby Open Spaces are bordering or close enough to function as wildlife corridors with CRSP. In addition, there is a distinct possibility that the lands to the south, currently belonging to the San Lorenzo Water District will be added to CRSP some day.

4. "May also contain ecological, geological or other features of scientific, educational, scenic or historical value". CRSP fulfills all of these without dispute.

It is not appropriate to refrain from giving CRSP the benefit of any doubt on these criteria. Clearly this is one of the places of best wilderness character that exists today in the Santa Cruz Mountains. The best use of this park that will serve the most people is to leave it in a wilderness state and allow visitors to enjoy it as such. Installing a new campground that people can essentially drive to will have reverberating effects on wildlife communities and ecosystems, and also will not serve a very large proportion of the visitors to this park.

Other comments and concerns:

1) Location of a campground at Partridge farm is inappropriate. A campground is inappropriate to begin with because it is in conflict with preserving native wildlife and ecosystems. Human activity in campgrounds has a reverberating effect well away from the immediate area with the effect of benefiting certain species and clearing others out completely.

Second, my understanding is that the vast majority of feedback that you have received is against having a campground, including the CRSP Advisory Committee who voted unanimously not to have a campground. I would like to know what authority you have to override this directive from the public.

Third, as you admit in the preliminary General Plan, Partridge Farm is close to a number of sensitive areas and in the area of Native American archeological sites. This is also inappropriate. Having any access, let alone campgrounds in this area would bring a higher risk of damaging these very sensitive areas. Furthermore, the controlled burns that you mention would be needed to help revive and maintain the Black Oak Forest near Partridge Farm would be impossible if a campground were sited there. This is in effect choosing an unnecessary form of human recreation over a sensitive native habitat. This also goes against your mission and what is in the best interest of the citizens of California.

2. I question the accuracy of the statement on p. 15, "However, most vertebrates occurring here are common and widespread throughout the state." I seriously doubt whether this is true, but if it were you should give specific information regarding this statement. It seems to me this statement is downplaying the importance of the native wildlife needs for the park. Many of the birds in particular, but also other wildlife are sensitive to the various sorts of human disturbances, and the lack of monitoring here would allow the extensive impacts of the proposed development to go unknown. This section of the document needs more detail regarding the diversity of wildlife in the park and the specific habitat needs that are not met "throughout the state".

3. In the section on p. 16, the designation of cowbirds and Wild Turkeys as exotic is incorrect. Wild Turkeys are native to California, and Brown-headed Cowbirds are native to the southern U.S. They did move into this area on their own, although as a result of human induced changes to the landscape all over the west. The discussion of cowbirds is good, but they are not considered exotic. Other native birds that are subsidized by human activities such as those found in campgrounds include jays, crows and ravens, which all prey on other birds nests, both eggs and chicks. This is part of the reverberating effects that I was referring to.

4. The idea of having food concessions in the park at all should be completely forgotten. This also ends up in subsidizing jays and other birds and animals that eat food from humans, and even their trash. As much as you might think this process could be curbed, it can't. It is unavoidable.

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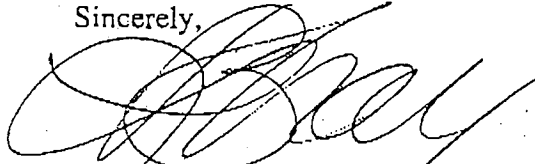
39

5. The map on p. 72 shows the black oak forest near Partridge Farm as a moderate use intensity area. It should be listed as a low use intensity area. The report notes that fire must be used in its maintenance and this precludes it from being a moderate use intensity area.

6. I do have more comments but unfortunately I am out of time. I will write again if the comment period gets extended.

Thank you very much.

Sincerely,



Leda Beth Gray
Member, Board of Directors
Santa Clara Valley Audubon Society



STATE OF CALIFORNIA

Governor's Office of Planning and Research

1400 TENTH STREET SACRAMENTO, CALIFORNIA 95812-3044

Gray Davis
GOVERNOR

April 13, 1999

ROBERT UELTZEN
DEPT. OF PARKS AND RECREATION
1725 - 23rd Street, Suite 200
Sacramento, CA 95816

Subject: CASTLE ROCK STATE PARK GENERAL PLAN
SCH#: 97121108

Dear ROBERT UELTZEN:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the eight-digit State Clearinghouse number when contacting this office.

Sincerely,

A handwritten signature in cursive script that reads "Terry Roberts".

Terry Roberts
Senior Planner, State Clearinghouse

Ernest Goitein
167 Almendral Avenue
Atherton, CA 94027
650 369 6690

April 15, 1999

California Department of Parks and Recreation
Sacramento, CA

Attention: Dave Keck

Subject: Castle Rock State Park

Dear Mr. Keck,

These are my comments on the Castle Rock General Plan

The General Plan (Plan) promotes the idea that the Castle Rock State Park (CRSP) should continue to be run as a state park. CRSP should instead become a "near wilderness", linked with adjacent areas of open space. There are many parks in the area, both municipal and state, as well as Mid Peninsula Open Space District areas. Since CRSP has the potential to become a future wilderness, which is unique to this area, that is the direction I would like to see.

41

A wilderness area will be less expensive to administer, is unique - being so close to densely populated urban areas, and provide space for the fauna, displaced by human activities.

The marvelous rock outcroppings in the park are unique. They should serve raptors and other wildlife species instead of rock climbers as might be the case if the area is not allowed to become a wilderness area.

Relocating the parking lot to the Partridge area is a bad idea. The more extensive use of trails near the parking lot will degrade the areas near trails emanating from the parking lot. There are sensitive areas near the proposed relocated parking lot.

42

No overnight facilities or car camping should be permitted. There are adjacent parks that have those facilities. It is incompatible with the creation of "near wilderness".

43

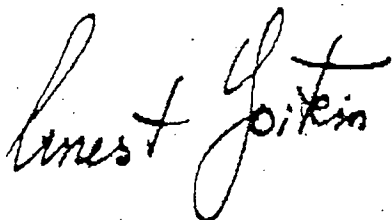
The use of mountain bikes should not be permitted. The District Superintendent's authority should not include that as an option.

44

I believe other alternatives, not mentioned in the plan must be considered. Among them, Wilderness Classification and Preservation.

Thank you for considering these comments.

Cordially,



March 24, 1999

James and Karen Laudon
Sylvia Sippel
13456 Indian Trail Rd.
Los Gatos, CA 95033

California State Parks
Northern Service Center
1725 - 23rd St., Suite 200
Sacramento, CA 95816

Dear California State Parks:

We are residents and property owners in Indian Rock Ranch whose property borders Castle Rock State Park, and as such, we have a strong interest in your plans for the park as outlined by the new General Plan. We would like to thank you for the effort put into this project, and applaud some of the good judgment used, as on the issue to drop the CalTrans site from consideration for public use. However, on several directions we disagree with the State Parks' plan, and we believe that it would be best to pursue one of the alternative plans outlined in the General Plan, either the Wilderness Classification or the Preservation Priority, the best compromise between recreational use and protecting the park's resources. Since the General Plan outlines intentions to pursue more recreational uses for the park's resources, there are several main concerns we have about the plan.

First, the introduction of mountain bikes into the park. There are hundreds of miles of bike trails in the near vicinity of the park; therefore, there is no need to open even some parts of Castle Rock to mountain bikes. Because Castle Rock is less developed and less heavily used than most park lands in the area, it is an exceptionally wild area providing a home to a higher population of wildlife. Introducing fast-moving bikes to the park could be very disruptive to their healthy existence. Bikes would also detract from the exceptional wilderness quality of the Castle Rock experience for all other users, and would create the usual conflicts between user groups, especially between equestrians and bikers. Of special concern to us is that you might allow bikers to use the park's right of way of Indian Trail Road (Saratoga Gap Trail) into the park. This would create a disastrous situation on our one lane road, full of blind curves, steep cliffs on one side, and frequent dense fog. Introducing bikes into the existing mix of vehicles travelling in both directions, equestrians, pedestrians, and dog-walkers, would be tremendously dangerous to everyone, and have major liability implications for the State Parks. Long-time residents warn that bikes were once allowed with disastrous results, and thus were again prohibited. We hope you will use common sense in this matter, and allow no bikes on our road. There are safer entrances for bikers elsewhere if they must be allowed park access.

Second, the issue of reinstating "the benefits of fire" into the park is one which we heard nothing about until the General Plan itself appeared, and then with little detail. The neighboring residents deserve more detailed information on the where, when, how, how often, and by whom of any fire plans, and we would like to know the California Department of Forestry's opinions on this issue.

Third, another apparently new issue mentioned without detail is the goal of "elimination of the existing high power transmission lines, along with the associated rights of way through the unit." This seems unrealistic, since one cannot simply "eliminate" legal rights of way, and providing power by other routes (underground etc.?) to those serviced by these lines would be prohibitively expensive and destructive of the park's resources.

Finally, rock climbers should simply not be allowed in the park. They have already, according to your own studies, caused irreparable damage. The State Parks should have more foresight than the average park user

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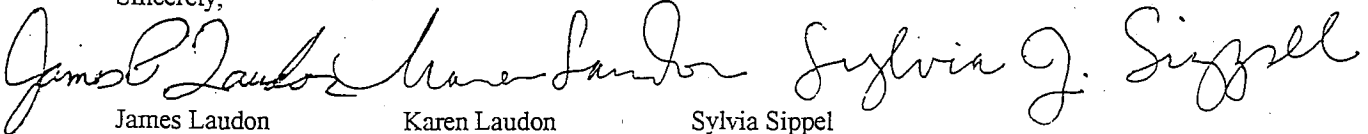
who might be thinking only of their immediate gratification, and have the wherewithal to say no to some detrimental activities when necessary to preserve the park's resources for future generations. The plan appears to do little more than leave it up to climbers to self-police, despite the fact that this has not worked so far.

Ultimately, we believe it is a mistake to open Castle Rock to more recreational use. There is plenty of recreational park land in the area to accommodate users, and Castle Rock currently offers greater respite to more wild plants and animals from the ever-increasing human population in our area. No where in the General Plan do we find explained how any of these plans and goals would be funded or maintained or enforced. To expand recreational use without adequate oversight could have disastrous results. The State Parks seems to be over-estimating demand for more recreational use because of a few vocal, well-organized groups. Natural resources like those of Castle Rock State Park are increasingly precious and rare and need protection from people's desire to do whatever they please with them. The State Parks must have better foresight and look to the future as well as the present needs. Please use good conscience and judgment and common sense when deciding the future of Castle Rock State Park.

49

Thank you for your time, attention, and efforts in these matters.

Sincerely,



James Laudon

Karen Laudon

Sylvia Sippel

Eva Maria Spitz-Blum, Ph.D.
P.O. Box 620066
Woodside, California 94062

Dave Keck, Project Manager & Staff
Northern Service Center
Department of Parks and Recreation
1725 -23rd Street, Suite # 200
SACRAMENTO, CA 65816

QUESTION RE
CASTLE ROCK STATE PARK

Ladies and Gentlemen:

I write this as the owner-manager of Shingle-Mill Ranch, a 37 acre portion of the 600 acres Shingle-Mill Reserve of wooded lands contiguous with Castle Rock- and Portola State Parks, to commend you for the thoughtful, lucid and balanced presentation of the **Draft of the General Plan** for Castle Rock State Park. The Draft is exceptionally well organized, simply written, a good read! Thank you for the opportunity to express comments, questions and concerns.

COMMENTS

I applaud and encourage your goal of scientific park management and, in particular, your plan to use change measures to evaluate the impact of any new projects.

Overall, the goals and intentions as stated in the Draft are nothing short of exemplary, especially the creation of a large NATURAL RESERVE. My concerns spring from two sources:

CONCERNS

- a. Aside from the ideals expressed in the Plan, I would like to see developed its substantive aspects; the nuts and bolts of proposed implementation. Without explaining whence the funding, how much, to what allocated; without describing the recruiting, the staffing, the training, the research methods to be employed for impact measurements and the like, we have only pious intentions.

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- b. In line with the above, I am concerned that, **lacking a detailed operational plan**, any start-up of your proposals, however praiseworthy, cannot be developed as the hoped for scientifically managed park but, on the contrary, will result in chaos and degradation of a precious public resource.
- c. Finally, I am concerned with the problem posed by your dual and, potentially incompatible, mission, that of protecting the eco-system of Castle Rock State Park on the one hand, and that of providing recreation to an ever-growing population on the other hand. From this concern spring a number of questions; all related to the need for a detailed operational plan (see [b] above).

QUESTIONS

I appreciate that your Plan must tread a delicate balance and we should be grateful for any information on how you will prioritize the recreational needs of the public and the requirements for preservation of the Park? I cite a specific example.

Rock-Climbing . Belatedly, the scientific community has realized the extraordinary ecological value and the fragile nature of cliffs and rock outcroppings (see the latest issue of Science, copy enclosed). There is no question that rock climbing destroys irreplaceable biological, geological, anthropological and historical features forever. Subscribing, as you do, to the scientific management of Castle Rock State Park, how do you propose dealing with the very well organized and very vocal rock climbing community? In cases of incompatible needs, or unresolved new issues, what provisions are in place (or planned) for input from the neighboring community and from the public at large who are neither organized, nor vocal, nor as articulate as are the special interest groups? With whom in the scientific community and with what scientific organization will you consult and coordinate in order to inventory and protect the Castle Rock State Park rock formations and their bio-communities before they are irreversibly damaged?

Supervision and Enforcement: Your plan envisages increased public use of Castle Rock State Park. Are there any provisions for commensurate increase in law enforcement personnel (and here I include Rangers)?

How are you planning to implement the supervision and enforcement aspects of the Plan? Specifically, how many new Rangers are foreseen, how will they be enticed to serve, what perks (housing), salary, training, will they be offered?

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Parking on Highway 9. Whom will you assign to make sure that the new parking areas foreseen do not lead to more garbage, more vandalism, more trespass, more neighborhood endangerment, more traffic congestion? Is more staff planned to police the parking facilities? Will there be garbage bins and regular pick-ups at the parking areas, destined to be more crowded. How does your Plan foresee and deal with the problems of clogged turnouts without possibility to pull in for commute traffic, already too speedy to be safe?

At present, it is the neighborhood that that notifies Park Rangers and Sheriff's Departments when heavy caliber automatic rifles are fired (not from the rifl -range). It is we who clean up garbage dumped on Highway 9, on Castle Rock State Park lands next to my gate, and at turn-outs and parking spots along Highway 9 on or near Park property! Only a few days ago, my neighbor, Larry Watson, notified the Sheriff's Department that he had spotted a hunter with rifle and pitbull (not on leash) descending into Castle Rock State Park from Sempervirens Look-out. Last week we cleaned up a full truckload of construction debris near my entrance (on Park property).

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Public Information and Education: What are your goals and who are your targets? On what available resources are you going to draw? What outcome measures will you be using and what use will you be making of the results?

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Thank you again for the opportunity to state concerns and ask questions.

I look forward to hearing from you,

Respectfully ,

Eva M. Spitz, Bl. Ph.D.

Enc: Scientists—and Climbers—Discover Cliff Ecosystems, *Science*, 1999, vol 283, 1623

ECOLOGY

Scientists—and Climbers— Discover Cliff Ecosystems

Researchers venturing onto remote bluffs find them to be oases of diversity, but rock climbers are taking out species even as scientists discover them

They're vertical, they're made of rock, and you can't see them up close without risking your neck. So it's not surprising that few biologists have paid much attention to cliffs. But lately, some hardy researchers have dangled from ropes alongside high bluffs, and they are finding unusual and ancient communities that don't exist in the flatlands below.

These first forays have turned up surprisingly diverse communities, including rare plants and lichens, birds, and trees nearly 1000 years old. "Cliffs protect themselves very well by being so inaccessible, so they can have unusual communities even in heavily populated areas," says Jerry Freilich, former ecologist for California's Joshua Tree National Park. Joshua Tree and other parks are commissioning new studies on these hard-to-reach habitats, largely because a boom in rock climbing is putting unprecedented pressure on them, says Freilich, now science director for the Nature Conservancy of Wyoming.

Wildlife biologists have long known that raptors such as peregrine falcons and red-tailed hawks nest on cliffs, where predators can't get at their young. And a few researchers cataloged sea-cliff plants in Ireland and Britain in the 1980s. But until fairly recently, there have been no studies of cliffs as distinct ecosystems. "Look at how hostile they appear. No one really viewed them as habitat," says Richard Knight, a professor of wildlife biology at Colorado State University in Fort Collins.

Knight and graduate student Richard Camp recently discovered that some of Joshua Tree's granite spires are actually islandlike centers of diversity. They found 60% more bird species, and three times as many plant species, on the cliffs than were on the flat, arid desert floors below. From top to bottom, the cliffs provide all sorts of niches: Rock wrens and white-

throated swifts rush in and out of cracks where they nest in great chirping masses, while the prairie falcons that prey on them incubate eggs on nearby ledges. Rock faces concentrate infrequent rains, dribbling moisture down to ledges and cliff bases to supply trees and succulents such as quercus oak and staghorn cactus that won't grow elsewhere; Lazuli buntings and other Neotropical migrant birds use this vegetation for nesting and food.

Researchers are still figuring out what makes some of these rocky, windswept sites so rich. One reason is that cliffs create a classic "edge effect"—a break in the normal landscape that is often more diverse than, say, the monotonous interior of a forest. Winds that bring insects and seeds from all over may also play a role. For whatever reason, "we do know the Joshua Tree cliffs are a distinct place," says Knight.

And because cliffs are so inaccessible, organisms once widespread may end up clinging to them as sanctuaries. About 5 years ago, in a boat off the Hawaiian island of Kauai, biologists from the National Tropical Botanical Garden there spotted what they believe were the last surviving individuals of *Munroidendron racemosum*, a primitive-looking tree with long, pendulous branches. The trees were sprouting from volcanic cliff ledges that looked as if they were about to crumble into the sea. All the others of their kind, once common on the island, had been eaten by human-introduced goats that couldn't reach this one last refuge. The biologists rappelled down, rescued seeds, and have since repropagated the species, says Paul Cox, director of the botanical garden.

Cliffs in the midwestern and southern United States also are home to a host of endangered species that have either been pushed there or just prefer rocky spots. They

include such plants as mud warts and water hyssops, which grow in shallow seasonal pools that form in cliff rocks in Minnesota, and lichens such as *Parmelia stictica*, which cling to vertical faces.

Lichens are often a major component of cliff ecosystems, notes biologist Michael Farris of Hamline University in St. Paul, Minnesota, but these low-profile organisms are hard to identify and poorly known. So lichen

biology remains a wide-open field. Last summer, rock climber Peter Smith, then a master's student in biology at Appalachian State University in Boone, North Carolina, surveyed one small part of the walls of nearby Linville Gorge and quickly came up with 23 genera inhabiting several distinct zones according to moisture. He also spotted one entirely new species, since named *Fuscidea pallida*. "He only did 12 transects, which makes us think there are many more undiscovered things up there," says Gary Walker, Smith's adviser.

In addition to their diversity, parts of cliff ecosystems can be remarkably ancient. Botanist Doug Larson and dendrochronologist Peter Kelly of the University of Guelph in Ontario, Canada, have found that some of the eastern white cedars dominating the 800-kilometer-long Niagara Escarpment of the Great Lakes region are up to 800 years old; well-preserved dead trees are more than twice that age.

Many of the cedars have multiple root systems attached directly to soil-less solution hollows and cracks in bare rock. Larson and his colleagues have found dense colonies of algae, bacteria, and fungi penetrating 1 to 3 millimeters into these apparently solid rocks. Larson hypothesizes that these so-called cryptoendoliths—previously known mainly from Antarctica—may help nourish the trees. Larson also notes that the cedars are apparently adapted to slow growth rates; in fact they are among the slowest growing plants known, adding only a couple of layers of cells each year, compared to perhaps 600 layers for their cousins on flat land. Twisted trunks may reach 3 feet in diameter, but some 200-year-old specimens are no bigger than a toilet plunger. Larson believes slow growth assures longevity and thus survival of the species. "It's an advantage—if they grew fast, gravity would drag them off before they got a chance to reproduce," he says.

Unfortunately, scientists are not the only



Up, up, and away. Climbers on granite spires in Joshua Tree National Monument put cliff plants and birds at risk.



Life on the edge. Ancient trees on the Niagara Escarpment are adapted to harsh cliff conditions.

ones discovering cliffs. Last year, 4 million people went rock climbing in the United States alone, and they left their mark on these fragile ecosystems, as Knight and Camp report in studies in the December 1998 issue of *Conservation Biology* and the April issue of the *Wildlife Society Bulletin*. Some Joshua Tree prominences are now hung with so many ropes that they look like Gulliver tied down by Lilliputians. To keep regular routes safe, climbers routinely "garden" them, pulling plants and soil out of cracks and wire-

brushing lichens off protruding handholds.

Not surprisingly, Knight and Camp's studies show that climbers reduce plant cover and drive off birds. Independent botany consultant Victoria Nuzzo of Rockford, Illinois, showed that climbers reduced lichen cover and species by half and took out three-quarters of threatened cliff goldenrod plants at one site in northern Illinois's Mississippi Palisades State Park. Perhaps worst of all, climbers on the Niagara Escarpment are clearing the way by cutting down the old trees. Survivors may be

used to fasten ropes, which strips their bark. Dendrochronologist Kelly has meticulously documented the damage; he dated one tree that germinated in 1215—and had its main axis sawed off in 1992.

Because the recognition of cliff life is so new, few parks have gotten around to making rules. As studies build, that may change. "I like to think that the more we learn about these places, the more we can demonstrate how special they are," says Kelly. —KEVIN KRAJICK
Kevin Krajick is a writer in New York City.

BIOTECHNOLOGY

Engineering Metabolism For Commercial Gains

Researchers are using genetic engineering to turn bacteria into chemical reactors that perform multistep synthesis of bulk chemicals

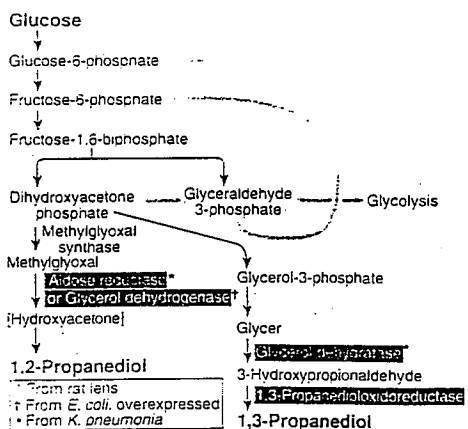
The chemical industry is going back to the future. Until the 1930s, most bulk chemicals came from microbes, which made them by fermenting biomass such as corn and potatoes. But after learning how to "crack" petroleum into simpler hydrocarbons, chemists took over. They devised complex, multistep schemes to convert these building blocks into bulk chemicals as well as smaller scale specialty products. Now, microbes are poised to reenter the bulk chemical business.

Two decades of advances in microbial genetics and a new understanding of cells' metabolic pathways are helping researchers turn microbes into one-pot chemical reactors, able to perform multiple enzymatic steps to convert sugars and other raw materials into industrial chemicals or pharmaceuticals. By combining several chemical steps into one reaction vessel, so to speak, the strategy can save large amounts of money. As a result, the chemical industry is now getting set to reintroduce fermentation as an economical means of producing many bulk chemicals.

For example, DuPont, in Wilmington, Delaware, is planning to put a modified bacterium to work turning glucose into 1,3-propanediol, a monomer that can be linked to form a polyester called polytrimethylene terephthalate, now found in some carpeting and textiles. "We have a tremendous opportunity here to make an impact with a highly efficient and cost-effective biological process," says Richard LaDuca, the project coordinator at Genencorp International in Rochester, New York, which is working with DuPont. Two different multistep processes are now used commercially to make 1,3-propanediol.

Genencorp is also working with Eastman Chemical, of Kingsport, Tennessee, to commercialize a microbial process that trans-

forms glucose into 2-keto-L-gulonic acid, the key intermediate in the industrial synthesis of ascorbic acid (vitamin C). The collaboration—which included several other companies and Argonne National Laboratory, in Argonne, Illinois—engineered an undisclosed bacterium to carry out the four-step metabolic pathway. According to chemical engineer Michael Cushman, Eastman's project director, this biological process is now, "without a doubt, the cheapest way to make ascorbic acid." If adopted, this one-step process would



Microbial industry. Equipped with genetically engineered enzymes (green), bacterial metabolism can transform glucose into propanediol.

replace the current seven-step method.

Other chemical companies are also trying to harness microorganisms to produce bulk chemicals. But they are generally tight-lipped about their efforts, because of both the financial stakes and the strategy's history of difficulties. "Replacing chemistry with biochemistry was one of the very first things to cross people's minds when genetic engineering

first came about in the early 1980s," says Douglas Cameron, recently hired away from the University of Wisconsin, Madison, by food-processing giant Cargill to build a metabolic engineering group at its Minneapolis research and development center. "But to do this on a commercial scale was a far more difficult task than anyone thought."

"Putting the new enzymes into an organism is really the easy part," adds Bernhard Palsson, professor of bioengineering at the University of California, San Diego. Indeed, it can be almost trivial, says Cameron, who is more forthcoming than many others working in industry. Developing bacteria capable of producing 1,2-propanediol—used today as a food additive, particularly for making semimoist pet food—took him and his group just a month, he notes.

They took advantage of *Escherichia coli*'s ability to convert glucose into small amounts of the compound methylglyoxal as a normal part of sugar metabolism. They knew that either of two enzymes—aldose reductase or glycerol dehydrogenase—would turn methylglyoxal into 1,2-propanediol. By consulting online databases, the group identified the appropriate genes for the enzymes and engineered them into *E. coli*. Current production of 1,2-propanediol by this engineered *E. coli* is a mere 0.2 grams per liter, "but these are our initial results and far from optimized," explains Cameron. He sees no reason to doubt that further engineering will increase production to the 100-grams-per-liter level needed to make the process commercially viable.

But coaxing a bacterium to shift much of its metabolic resources into making a particular compound is a challenge nonetheless. The production of an individual metabolite via a particular pathway is affected by the ebb and flow of dozens of other pathways in a cell's metabolism. "Eventually, you have to start looking at metabolic fluxes in the organism, in an attempt to choose pathways to get rid of or down-regulate in order to shunt more metabolic energy into the pathway you've engineered," says Palsson.

He and others, including James Bailey of

April 8, 1999

California State Parks
Northern Service Center
1725 23rd Street, Suite 200
Sacramento, CA 95816

I was disappointed to read that the Preliminary General Plan for Castle Rock State Park does not include the use of mountain bikes on fire roads and selected trails.

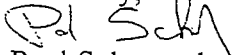
I am both an avid hiker (having lead hikes for the Sierra Club for the past 7 years) and a mountain biker. I live at 23101 Highway 9 directly across the street from the southern part of Castle Rock, near part of the Skyline-to-the-Sea and a few other trails in Castle Rock. I've noticed that the Skyline-to-the-Sea and the Castle Rock trails near my home get very little use by anyone.

When I go mountain biking, the closest trail available for mountain biking is at Saratoga Gap (managed by the Mid Peninsula Open Space District), 4 miles away via Highway 9. I use my car to get to the trail head, since the few times I've bicycled up Hwy 9 I felt that I was taking my life into my hands. There isn't much of a shoulder on the road and many cars and motorcycles treat it like a race track. The trailhead for bikes at Saratoga Gap is packed with mountain bikers since so few trails are available to them in the area.

I agree that many trails in Castle Rock are inappropriate for mountain bikes since they are already very busy with hikers, especially many of the single track trails. I do think it's time to relieve some of the congestion off of the Saratoga Gap trailhead and allow bikes on fire roads in Castle Rock. Also, a safe alternative to Highway 9 for those of us that would like to bicycle between Waterman Gap (Big Basin/Highway 236 area) and Saratoga Gap could be provided by opening up some of the little used parts of the Skyline-to-the-Sea trail in that area.

Mountain biking is a great way to enjoy the beautiful environment of the Santa Cruz mountains as well as getting some exercise. I think that each group of trail users needs to have their concerns and needs met as best as possible and I recognize that this can be challenging. However, I feel little effort is being made to accommodate the needs of mountain bikers at Castle Rock State Park, while, as taxpayers, mountain bikers have as much right to use the park as any other group.

Sincerely,


Paul Schoemaker

Physical Address: 23101 Highway 9
Los Gatos, CA

Mailing Address: 14510 Big Basin Way #223
Saratoga, CA 95070

San Carlos, California
April 3, 1999

Castle Rock State Park Planning Team
Northern Service Sector
1725 23rd Street, Suite 200
Sacramento, CA 95816

Dear Planning Team

I am a regular visitor of Castle Rock State Park, and wish to respond to the CEQA Draft.

If it ain't broke, don't fix it. Right now, it already serves the needs of its visitors in a way that is just about ideal. **56**

Not every state park needs an interpretive center. There are already many such facilities in the Peninsula and South Bay region. If Castle Rock had one, how would it be staffed? **57**

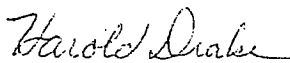
Please leave the parking just as it is now. It accommodates 50 cars, with substantial additional roadside parking. Just keep it graded and graveled. Don't unnecessarily disturb the Partridge Farm area. **58**

If you have some money to spend on Castle Rock, I have two suggestions:

1. Hire an additional ranger.
2. A half-mile section of the Saratoga Gap Trail, just west of Castle Rock Falls, is in poor condition and needs heavy maintenance. Some parts should be re-constructed.

Thank you for the opportunity to comment on the Plan.

Sincerely,



Harold Drake
2081 Greenwood Avenue
San Carlos, CA 94070
(650) 591-0482

April 9, 1999

California State Parks
Northern Service Center
1725 23rd Street
Suite 200
Sacramento, CA 95816

To whom it may concern,

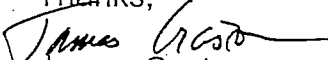
I am writing in regard to the preliminary general plan for Castle Rock State Park. I am concerned about the limited access that is being envisioned for the park. I am a hiker, an environmentalist (Sierra Club member), a dog owner, and a mountain biker.

Castle Rock State Park is my backyard. I use this park frequently, because it is beautiful and because I live in the Santa Cruz mountains, immediately adjacent to the park. This is a beautiful area, with ample trails and fire roads, but I do not understand why no consideration is being given to access to mountain bikes, even if only limited to the fire roads such as the Skyline to the Sea trail.

Multiple use of this park is a good thing because it would relieve some of the pressures off of the surrounding parks, and would provide a way to travel through the San Lorenzo valley without riding on highway 9. As it currently stands, I see little use of the park that is away from highway 35, and almost no use of the fire roads.

I hope you reconsider access to the park so as to allow bikers to use some if not all of the fire roads at Castle Rock. I especially would like an alternative to riding my bicycle on Highway 9.

Thanks,


James Gaston
22555 Highway 9
Boulder Creek, CA 95030

Or

C/O K2 Technologies
4000 Moorpark, suite 200
San Jose, CA 95117
408.615.4211

LINDA V. ELKIND
14 Hawk View
Portola Valley, CA 94028

4/12/99

California State Parks
Northern service Center
1725 23rd Street, Suite 200
Sacramento, CA 95816

Fax: (916)324-0888

RE: Castle Rock Park General Plan

Please consider my comments in the overall context that I disagree with the premise which states that "The purpose of Castle Rock State Park is to be managed as a State Park." I believe that in the future Castle Rock lands should be protected to allow it to realize its future as wilderness. The precedent for lifting "park Lands in the State Park System" to Wilderness stature exists in the Sinkyone Wilderness State Park unit on the "Lost Coast". I believe that Castle Rock has excellent potential to be wilderness and it should not become a heavily used Park with the impact from camping and heavy use.

Therefore, the declaration of purpose of Castle rock State Park should be rewritten to include the language from the original vision which states the values of the natural area of the Santa Cruz Mountains and says that it incorporates a particular combination of geology, topography and plant assemblages, including the unique caves and related erosional anomalies in Vaquero sandstone

"To accomplish this purpose, the California State Park System is to manage the Park resources in such a way as to retain them in a near wilderness state..." In all cases facilities where needed shall be simple and primitive, provided in designated locations with the least disturbance to the scenic beauty and resource values of the overall area.

I have some additional specific comments.

Hydrology (pg 20, 21.)

Although the report sites the existence of Travertine Springs, it fails to discuss future plans to protect them with special status or suggest management to protect them.

Please add details to the plan which will manage the small earthen dams and associated reservoirs to avoid damage to downstram aquatic resources should the unmaintained dams fail.

Existing Facilities (p.33)

I am concerned about the proposal to relocate the parking lot to Partridge. Discussion of the impact of adding this new parking lot does not include the secondary, but most important and extensive impact of so doing. This impact is that the trails closest to the parking lot will be the most impacted and the damage from heavy use will spread into the sensitive areas which should be designated for inclusion in a protected preserve.

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Public Access, Development and Use of the Partridge Farm Area (p.44)

Please avoid opening the Partridge Farm area. Control impacts by making it physically more challenging to reach the popular destinations. Limit the number of people who have access at any given day. Locate a primary contact location center at Saratoga Gap (see p 98). Locate small parking facilities at trail heads.

63

Camping and overnight accommodations (p47)

Allow access to camping for walk in only. It is totally inappropriate to provide camping for Rvs at this location. It is inappropriate to provide parking to allow short walks into camping.

64

Managing Resources and Visitor Impacts (p48).

I am disappointed in the language which suggests that there will be monitoring of conditions and actions considered when impacts threaten to exceed standards, because it is vague about who, what and when and how. There must be specific performance thresholds stated in the plan and a schedule for review and specific actions for stopping damage to the resources. The actions should be mandatory. The thresholds for taking action must be specific. The times for evaluation must be frequent and specific. And accountability and penalty for destruction of resources built into the plan.

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Resource Value p 52.)

The plan acknowledges that the present level of use is causing degradation. It is wrong to be planning for facility development which will increase use even more than at its present level. Access and facilities should not be developed before coming up with methods to limit damage to below existing levels and to mitigate previous damage.

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The plan on page 46 describes the impacts from climbing and that the "increase in climbing in the park has resulted in congested activity areas and has caused users to pursue new climbs deeper into the interior of the park. Unauthorized trails and rock bolting are appearing in areas previously undisturbed".

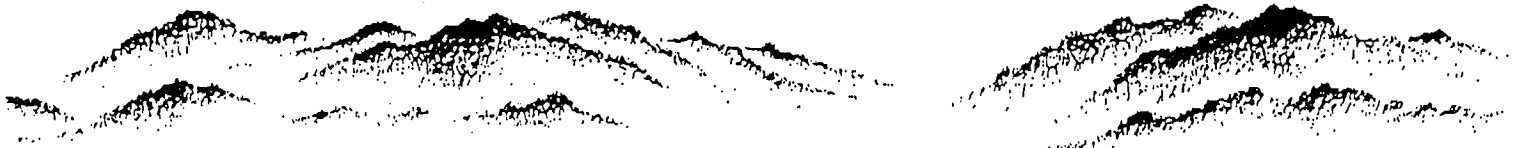
Access to Bikes should not be allowed at all.

67

I appreciate the opportunity to comment on the Preliminary General Plan.

Sincerely,

Linda Elkind



SIERRA CLUB • LOMA PRIETA CHAPTER
San Mateo • Santa Clara • San Benito Counties

Formal Response:
Castle Rock State Park Preliminary General Plan
February 1999

April 10, 1999

Introduction

The Loma Prieta Chapter of the Sierra Club is pleased to submit the following response to the Preliminary General Plan for Castle Rock State Park.

As Chairperson of the Chapter's Forest & Wildlife Committee, I have personally been a participant in the General Plan process for over two years. During that time, I have been involved in discussions with State Parks staff, with the (now defunct) Advisory Committee, with other environmental groups, with Sierra Club activists and members, with members of the public at large, and with independent biologists and ecologists. Additionally, of course, I have spent significant amounts of time in the park itself to review the habitats and natural communities, along with the recreational opportunities offered by the park. In this response, I will advance several concepts in addition to straightforward comments because there have been many advances over the last few years in our knowledge of large-scale biological processes, and in terms of human recreational impacts on natural communities. It is germane to express them again in this formal response as I have done on other, more informal, occasions.

All this is to say that the response herein is based on deep knowledge from many sources rather than a casual or narrow interest in the park. The response, as one would expect from an environmental organization, is based on an ethic that respects the health and sustenance of natural communities and processes in the park. Within that context, recreational activities must be organized and planned sensitively so as to not destroy the very qualities that give Castle Rock State Park its unique place within the State Parks system – just as every other park has its own unique qualities. We, the Sierra Club, support sensitive recreational activities within the park, and I wish to make it clear at the beginning of this response that we have no intention to unreasonably restrict recreation at Castle Rock. Since the word "unreasonable" is highly subjective, I will clarify that by saying that we think that the present (that is, prior to this General Plan) level of activities is appropriate and can be maintained in the ecological context outlined above. Having said that, it is clear that some form of management plan between State Parks and rock climbing organizations is necessary to ensure that unauthorized trails and rock damage activities are curtailed. We understand that most rock climbers are generally willing and eager to participate in creating such a sensitive plan.

68



3921 East Bayshore Road, Suite 204
Palo Alto, CA 94303
415.390.8411

State & Regional Context of the General Plan

The general plan for Castle Rock, as for any other State park, must be formed within a framework that flows from the mission of California State Parks; that is, it cannot legally be formed with arbitrary guidelines and ideologies as appears to be the case with this plan.

California State Parks' Mission 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 valuable natural and cultural resources, and creating opportunities for high-quality outdoor recreation."

This mission contains linked themes that can be identified as:

- While we ecologists have qualms about the mission being highly human-centered (anthropocentric), never-the-less, it is clear that in so being, the quality of the natural communities is paramount. It does not say that ecological degradation may occur to allow of more intense recreation, but, on the contrary, that biodiversity must be protected to allow of high quality recreation (in addition to offering health, inspiration and education to the people of California). As will be detailed later, the theme of high quality recreation is important because of the development proposals embedded within the proposed General Plan.
- The mission is to "preserve the state's extraordinary biological diversity...", not just that of individual State Parks. That is, State Parks must act within the context of participating in biodiversity and natural community conservation across the whole of California. State Parks cannot, under this mission, ignore what is happening around it with respect to natural communities.
- Nowhere does the mission suggest that ease or convenience of management, or revenue generation (of a park) are imperatives.

Given this analysis of the Mission of State Parks, we can make these assertions about the generation of a general plan for any State park:

1. The detailed management plan for each park should be consistent with both State Parks' mission, and with the declared Purposes and Vision statements for that park.
2. Each park general plan should meet that mission set in its regional context, not in isolation. The regional context includes local and regional lands under private and other jurisdiction ownership, i.e. ecosystem linkages are critical considerations in the Plan.
3. All ecosystems are under threat by invasive (non-native) species which, combined with human development and access, render many species threatened, endangered, or extinct. Of these elements, DPR deals largely with human access, and the plan must deal sensitively with human access given California's increasing population, and the increased use of destructive mechanical recreation toys.

4. While endangered or threatened species have been given special consideration because it is relatively easy to quantify the status of individual species, yet the greater truth is all native species are important because of the inter-relationships between all native species, whether abundant or endangered/threatened. No single species can exist and survive without the healthy web of all other species, and so the biological thinking in all parks must, as the mission so clearly states, maintain the whole biological diversity.

Note on "Natural Communities"

In this narrative I purposefully use the term "**natural communities**" because it is a concept that allows us to understand how we protect biodiversity and the natural resources at Castle Rock and elsewhere. Very briefly, "natural communities" refers to all living organisms/creatures and non-living "things" along with the relationships and inter-actions between them that creates what we see and enjoy - biodiversity (all life), fertile soil, air capable of supporting life as we know it, and water to sustain that life. That is, "natural communities" embraces the idea of natural processes - both biological evolution as we know it, and the evolution of a multi-dimensional environment that can support life on the planet (since both are inter-dependent). Natural communities on a grand scale are essential for all life, including human, on the planet, and thus the health of these natural communities is critical at the local and regional landscape basis - an idea encompassed within State Parks' mission.

Moreover, we can distinguish and understand the differences between "natural communities" and "human communities", and we can consider how they interact so as to maintain the health of both. We can see that the mission of State Parks can be perceived as comprising both of those communities, and that they both depend upon the other being healthy.

Finally, for those who would say that I should continue to use the commonly used expression "natural resources", I assert that this latter expression implies that everything is for the use of human beings. Ecologists acknowledge the survival needs and imperatives of humans, but also acknowledge the rights of other living things to live for themselves, not as resources for humans. The balance is, of course, tremendously complex, and I will not address that here, except to say that the concept of natural communities incorporates the notion of stewardship or (even better) of kinship whereby living entities other than humans have their own rights. It should also be noted that with a sense of enlightened self-interest, any aware human will understand that we humans absolutely require a healthy natural world which is rich in both diversity and on-going ecological/evolutionary processes.

Given this background, it is appropriate to review the unique qualities and values associated with Castle Rock State Park, and I will separate those ideas into two groups - natural communities, and human communities.

State Parks, in the Preliminary General Plan, has done an excellent job of identifying the unique values of Castle Rock, and my purpose here is only to identify the themes that are critical in this response to the plan.

Critical Values of Castle Rock State Park

A. Natural Communities

1. Ecologically and biologically, Castle Rock is an integral part of the whole Santa Cruz mountain range, with natural processes that link directly with other private and public lands. This is the bio-geographical imperative inherent in State Parks' mission of **".....helping to preserve the state's extraordinary biodiversity...."**.
2. It is a genetic crossroads between public lands along the skyline, and the coastal ecosystems via the San Lorenzo Water Company lands, and Big Basin State Park. Thus, its ecological health, and its natural links with surrounding lands are critical in maintaining natural evolutionary processes.
3. It contains an impressive example of the healthy recovery of natural processes and natural communities when largely left alone by humans. If we objectively see that logging of this range can be regarded ecologically as a disturbance phenomenon, and that over time all natural areas have endured disturbances (climatic changes and fire being particularly important), then we recognize that recovery to wilderness is occurring within the park in a healthy manner.
4. The continuation of that recovery from almost total clear-cut logging to a state of wilderness should be the critical component of the General Plan. It is critical to the biological health of the mountain range, and to the preservation of endangered/threatened species, that this recovery be maintained.

B. Human Communities

1. Its biological health is an important part of the greater Bay Area's human need and desire for local natural and wild experiences within a day's reach. For many families, the opportunities to visit the back-country areas of the Sierra Nevada are restricted by virtue of distance. Castle Rock offers a unique local opportunity to enjoy those special wilderness qualities, often regarded as spiritual, that are part of the human needs for living healthily.
2. Visitors express great enjoyment for its wildness, which enhances human enjoyment of the spectacular scenery and geologic formations.
3. Public input to the plan was predominantly in favor of retaining the wild character of Castle Rock, along with sensitive recreational activities. It is particularly germane in the Bay area to maintain some semblance of wild areas, and we legally define that as "wilderness".

Having discussed and constructed a framework for analysis of the plan, it is now appropriate to review our overall perception of the Preliminary General Plan for February 1999.

Our Assessment of the Preliminary GP

Note: for those with color copies, comments in green indicate a good ecological ethic, while those in red indicate a destructive ethic.

Positive Aspects

1. Good analysis of the ecological and recreational values of CRSP.
2. Much good language in the Purpose and Vision statements.
3. Good RMZ (Resource Management Zones) biological analysis and guidelines.

Negative Aspects

1. The central notion of the plan as proposed is not protection of the unique qualities of Castle Rock and its natural communities, or of high quality recreation as called for in State Parks' mission but, on the contrary, is what we will call a "Partridge Development Plan". This development plan would bring people, cars and equipment up to the proposed Natural Preserve, and in addition to being contrary to State Parks' mission, is also destructive of the Unit Vision statement: *"Castle Rock State Park becomes a place of spectacular scenic beauty – a natural area mostly unencumbered by human habitation or sensory intrusions. The park remains an integral component of the Santa Cruz Mountains ecosystem and its evolutionary processes, provides public access to this unique environment, and offers visitors a place to enjoy and appreciate its inherent resource values"*. 69
2. Contrary to PRC (Public Resources Code, sections 5001.96 & 5019.5) which states that the land carrying capacity shall be determined before any park development plan is made, and that attendance at State Park System units shall be held within the limits established by this capacity, no carrying capacity analysis is presented. The plan fails even to attempt to establish the need for visitor facilities at Partridge. So far as we can see, the parking and overnight camping, plus potential (likely) concessions, have only one purpose, revenue generation - and that was an imperative from a previous State administration which is no longer in office. 70
3. The concessions section (p. 81) promises to transform a very unique place into another Disneyland where everything is fiscalized - as Oscar Wilde said "Nowadays people know the price of everything and the value of nothing". Almost all of the public input showed great appreciation of Castle Rock's unique value of wildness, and here we have a plan that says "mobile food units should be considered for providing contract services to visitors of Castle Rock State Park, when operated in appropriate parking locations". How does State Parks relate that to their mission of "providing high quality recreation"? One only has to visit Yosemite to understand the destructive power of concessions, which are driven by revenue-generation motives, not in this case by achieving State Parks' mission at Castle Rock. 71
4. The resource management protection & recovery guidelines are just that by prior Departmental fiat. That means that all of the ecological guidelines in the Resource Management Zones (pp. 54 - 58) are guidelines, but not mandates, regardless of whether they support both State Parks' mission and the Purposes of Castle Rock State Park. Furthermore, throughout the document, the phrases "should be...", "may be..." and 72

“actions will be considered...” are repeated with no criteria for review, no criteria for action, and no definition of who will decide. From a conservation perspective, this plan is full of holes that will allow almost any developments without regard to mission statements or park purposes.

5. The plan would specifically authorize the District Superintendent to open specific roads and trails to bike usage (p. 74). It is clear to all except some bikers that the unique qualities of Castle Rock would be greatly impaired by opening trails to bikes – this is not the park where that activity is appropriate. It is neither necessary nor desirable for every park to offer everything; rather, the only rational approach is to allow and encourage activities that are consistent with the quality and spirit of the park within its bioregional context. Leaving the option to allow bikes in the park promises the certainty of conflicts in the future – the bikers will maintain pressure to open trails, most other visitors will resist that, with the result that this issue will be like an open, festering sore. Far better to ban the possibility of bike trails now and allow all parties to put their creative energies in places where biking is appropriate.

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Summary of Our Assessment of the Proposed Plan

We have previously described the Partridge development plan as being a “cookie-cutter” approach to management, and the above comments indicate why that is so:

1. Consolidating activities at one central point is a long-term State Parks method of (presumably) making park management easier.
2. Driving and parking close to the best examples of natural communities, rather than allowing people to experience in tranquillity the pathway to, and arrival at, the most inspiring ecosystems and views. As another example of this cookie-cutter approach, one has only to look at Big Basin SP where the road and parking lots are in the midst of superb examples of massive, ancient coastal redwoods.
3. Fiscalization of the facilities to increase revenue – although the notion of food concessions at Castle Rock is a particularly egregious one.
4. Proposing that Castle Rock can have what every other park has – parking adjacent or in sensitive areas, concessions, (probably at some time) biking trails – rather than accepting and celebrating the limits due to the park’s unique qualities.
5. Placing revenue-generation above biodiversity conservation.

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Thus, it is abundantly clear that the “Partridge Development Plan” is inconsistent with:

- State Parks’ overall mission
- The proposed Unit Vision and Declaration of Purpose in the Preliminary Plan
- The vast majority of public input

In fact, the plan presents a dichotomy in that while the Vision and Purpose statements, and most of the background material, give an excellent understanding of the natural and human values of Castle Rock State Park, yet the management plan that is supposed to preserve and enhance those values is in direct contradiction to those values. Does the authoring team for this plan realize the great dichotomy? We recognize that the team was placed under difficult and irrational pressures by a previous administration, but since that no longer exists, it is time to move forward into a healthy plan for both natural and human communities.

Our Outline Proposal

We propose that State Parks should develop a management plan for Castle Rock that is:

- Consistent with State Park's mission (for both human and natural communities);
- Consistent with the Purpose & Vision for the park
- Consistent with healthy ecological principles

In summary, that means:

1. The purpose of CRSP will be to protect and restore Wilderness in the Santa Cruz Mountains. Wilderness to be unambiguously stated, using and meaning the legal definition of wilderness.
 - Classify all undeveloped areas as State Wilderness.
 - Restoration and preservation of natural communities and natural processes to be the primary considerations within the Park.
 - The boundary of the Natural Preserve will include all tributaries within the San Lorenzo and Kings Creek watersheds, and will not be reduced by the location of the power lines. Furthermore, it would include the entire black oak woodland and knobcone pine forest.
 - Exclude Tin Can Ranch, existing main parking lot, Sempervirens Point, Partridge, and highway buffer zones from wilderness designation.
2. Primary visitor contact will not be re-directed to the Partridge Farm RMZ. Partridge will not be developed as proposed in the preliminary plan of February 1999.
 - No public use facilities to be constructed at Partridge Farm.
 - All concessions, particularly food, to be specifically precluded from future consideration anywhere at Castle Rock.
3. There shall be a Resource Management Plan with goals as directives, not simply as guidelines (although there would be an appropriate blend of mandates and guidelines in the Plan).
4. Retain existing activities and visitation at approximately the same level as today, but with some management modifications.
 - Maintain existing hike-in campgrounds
 - No new campgrounds within easy walking distance of an automobile
 - Maintain existing visitation levels
 - Develop sensitive rock climbing plans with the climbing community
 - No new trails to be constructed
 - Unauthorized trails to be removed
 - Mountain biking to continue to be unauthorized (except perhaps for current campsite access)
5. Following preparation of natural community (natural resource) management plans, habitat restoration projects to be undertaken.
6. Total parking to remain approximately as now - 439 cars plus one bus for 2063 visitors/day.

Conclusion

We have been greatly disappointed by the disregard shown in the preferred plan for the mission of State Parks, for the public input, for the legal requirements, and for the unique qualities of Castle Rock State Park. It appears to have been generated under an ideological regime that favored revenue-generation above the legal, ecological and social imperatives that comprise the appropriate framework. In this commentary, we have chosen to highlight the problems with the preferred alternative, and to suggest an alternative outline that would meet all of the imperatives mentioned above.

For a more detailed analysis, and set of questions, we support and join in the testimony submitted by the Santa Cruz County Chapter of the California Native Plant Society.

Further to the concerns that we have with regard to the potential impacts of the specific proposals at Castle Rock, we also are concerned that the inherent fiscalization ideology will become a precedent for continuing the same destructive theme at other state parks. We are aware that a new general plan process for Big Basin State Park is already under way, and we are concerned that it will follow the same course. Thus, the general plan at Castle Rock has wider implications than solely the local impacts, which increases the imperative for it to adhere to State Parks' mission in ecologically healthy ways.

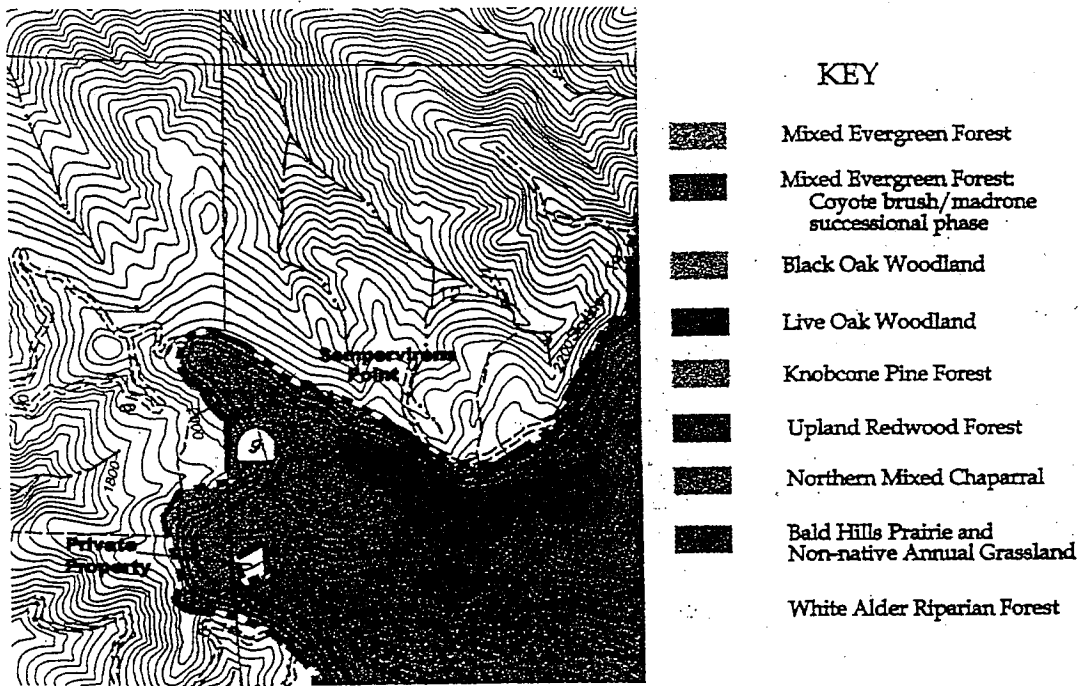
RECEIVED
APR 14 1999

April 12, 1999

Dave Keck
Associate Landscape Architect
Project Manager
California State Parks, Northern Service Center
P.O. Box 942896
Sacramento, CA 94296-0001

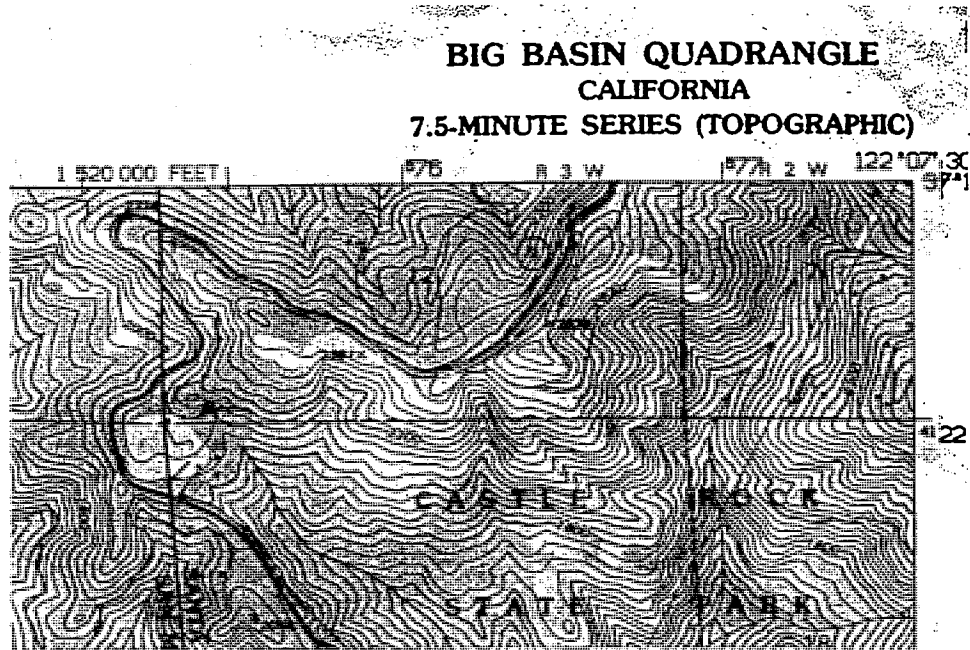
Dear Mr. Keck:

I am writing with regard to the Castle Rock State Park Preliminary General Plan. My wife and I live in our home within the park in the area identified as Private Property in this portion of Map 1/8 below.



There is one additional private residence within this area. We all are extremely grateful to be here and pursue a long-term relationship with our neighbor on all sides, Castle Rock State Park. At a neighborhood meeting discussing the plan, Jan Anderson suggested that I contact you with regard to my concern outlined below.

With regard to the Plant Communities Map 1/8, I believe the area around the private property is incorrectly classified as "Mixed Evergreen Forest". It should instead be identified as a mixture of "Northern Mixed Chaparral", and "Bald Hills Prairie and Non-native Annual Grasslands". References to this area in the Plan identify it as "Tin Can Ranch", proposed site of the Environmental Learning Program. Note that the label in Map 1 is not located at the Tin Can Ranch location. These alternate classifications would be more consistent with the current USGS topographical map, and the similar nearby areas at the Sempervirens point overlook and Summit Meadows trail:



79

To the benefit of both the park and ourselves, please revisit this classification. Future management decisions should be consistent with the correct classification. This area has been affected by man for a long time, but we see no evidence that this area was forested in the long-term. It is surrounded by mixed evergreen and at first appears the same until one notices the remnant meadows, Douglas fir near-monocultures and extensive plantings of exotics. We feel these unique areas are under intense pressure from Douglas fir trees, perhaps as a result of fire suppression over a long period.

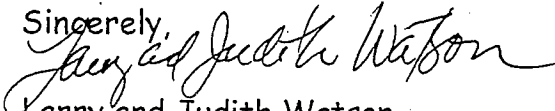
The benefits to the park would be the value of reduced wildfire risk to buildings, and open space available to support a wider range of use activities

or the ELP or maintenance facilities when compared to mixed evergreen forest.

If the area were managed as chaparral or grasslands, in addition to the reduced wildfire risk, we would be able to live a more environmentally responsible life here by increasing solar radiation required for gardening, photovoltaic electricity generation, and passive heating of our dwellings. Maximizing solar gain would also maintain or enhance our views.

This was discussed with you at the community meetings, but I see no evidence of consideration. I would appreciate being contacted by an ecologist regarding these matters.

Sincerely,



Larry and Judith Watson

P.O. Box 61
Saratoga, CA 95071
408-867-2444

Dave Keck
General Planning Team
Northern Service Center
1725 23rd St., Suite 200
Sacramento, Ca 95816

Dear Mr. Keck,

I do not support the proposed General Plan for Castle Rock State Park. I do support the proposal made by Friends of Castle Rock State Park and the Sierra Club to keep Castle Rock as a Wilderness Area.

At the heart of my disagreement with the plan is your current intention to pave the Partridge Farm area, develop new infrastructure, and permanently open up a section of the Castle Rock ridge to automobiles and their associated problems.

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The stated declaration of purpose, as well as the proposal for a "Natural Preserve" have obviously been carefully written to sound like preservation measures. In actuality, this is a plan for partial development via Partridge Farm. While creating a Natural Preserve sounds good in a press release, what the plan is actually doing is decreasing the area of the park treated like a Preserve. At the present time, under a decades old management policy, the ENTIRE Park is being held in a "near wilderness state." Your proposed plan is designed to remove this protection from at least half of the park.

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This flies in the face of the public input received by your agency which is overwhelmingly opposed to paving parking lots on our state parks, and particularly opposed to the paving the Partridge Farm area. A count of letters written to the park on the issue proves this opposition as does statements by every major environmental group in the area, including two chapters of the Sierra Club, the Audubon Society, the California Wilderness Coalition, and the Friends of Castle Rock State Park.

While a visitor center need not be a problem in and of itself, the plan to put it in the center of most dramatic portion of the park- the Goat Rock/ Castle Rock Ridge, is highly objectionable. This area of the park is already overused. The proposed parking lot would have a negative impact on rare Black Oak Forest surrounding the long abandoned Partridge Farm area and prevent the rehabilitation of area. By

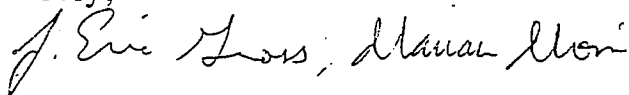
82

creating instant automobile to Goat Rock (just several hundred yards from the proposed parking lot) the quality of rock climbing at the site will be decreased through overcrowding while erosional problems will increase at an accelerated rate. The water and sewage infrastructures necessary to support the scale of the proposed visitor center are highly destructive. The single largest environmental hazard in nearby Big Basin State Park is sewage leaking from the park's own "treatment" system. In addition to being ill suited to the area, such water and sewage systems are unduly expensive.

Any new visitor center (with its attendant infrastructure and parking) should be no more than 100 feet from existing roads, where parking as well as sewage and water systems are easier to build and create less harm. The abandoned Caltrans lot at the intersection of highways 9 and 35 would be a good place for it, and could serve not just Castle Rock but other county parks in the area.

Castle Rock State Park is currently being treated as a wilderness area. It should be ratified as such. There is plenty of automobile based access to state parkland throughout the coast range, including very easy automobile access to Big Basin State Park, which adjoins Castle Rock. The very real need for wilderness within the ecosystem of the California Coast Range can and should be met by the declaration all of Castle Rock State Park as wilderness.

Sincerely,



La Casa Tierra Rica

cc. Bruce Bettencourt, Friends Of Castle Rock

To: Headquarters.SMTP("BABettenco@aol.com")
From: Joe Rigney <wildlands@butterflydreams.com>
CC: Parks &
Subject: CRSP: Santa Cruz CNPS Position Statement
Date: Tuesday, April 13, 1999 10:18 PM

Position Statement
Castle Rock State Park Preliminary General Management Plan

FINDINGS

Upon reviewing the Preliminary General Management Plan for Castle Rock State Park, the Santa Cruz County Chapter of the California Native Plant Society (CNPS) finds that:

- 1) The plan is in violation of the California Environmental Quality Act (CEQA) because it
a) fails to identify the ecologically superior alternative;
b) fails to identify significant environmental impacts of the preferred alternative;
c) fails to mitigate to a less than significant level the unavoidable impacts associated with shifting visitor impact to the Partridge Farm Resource Management Zone. 84

- 2) The plan is in violation of the California Public Resources Code Sec. 5001.96 and 5019.5 because, instead of determining the land carrying capacity based on the ecological constraints of the park, the plan assigns the land carrying capacity based on the perceived operational needs of the Department of Parks and Recreation; 85

- 3) The plan is in violation of the Department of Parks and Recreation Resource Management Directives #9 and #27 because the boundaries of the natural preserve fail to adequately encompass the important watershed influences and ecologically significant resources of the park; 86

- 2) The preferred alternative is not the ecologically superior alternative; 87

- 3) The plan fails to provide baseline ecological data on sensitive habitats; 88

- 4) The preferred alternative fails to mitigate unavoidable ecological impacts to a less than significant level; 89

- 5) The plan fails to mandate resource management directives; 90

- 6) While the plan requires a Rock Climbing Plan and several plans to develop facilities in the park, the plan fails to require development of a Resource Management Plan; and, 91

- 7) The plan does not recognize the park as a critical core ecological reserve in the Santa Cruz Mountains. 92

POSITION

It is the position of the Santa Cruz County Chapter of CNPS that the Department of Parks and Recreation should present for public review a Revised Preliminary General Plan for Castle Rock State Park that complies with the California Environmental Quality Act, the California Public Resources Code, and the Department of Parks and Recreation Resource Management Directives. Since both the Wilderness Designation Alternative and the Preservation Priority Alternative are ecologically superior to the preferred alternative, CNPS requests that the preferred alternative embrace the values of both through designation of the majority of the park as a natural preserve. The purpose of the park under the Preservation Priority Alternative should be to restore the park to a designated wilderness area. The statement of purpose should be unambiguous and should set the legally defined term "wilderness" as a long-term goal.

Adopted by the Board by Unanimous Vote on 4/12/99

DEPARTMENT OF TRANSPORTATION

P. O. BOX 23660
OAKLAND, CALIFORNIA 94623-0660
TELEPHONE (510) 286-4444
FAX (510) 286-5513



April 8, 1999

SCL035005
SCL-035-14.10
SCH #97121108

Mr. Robert Ueltzen
Department of Parks and Recreation
1725 23rd Street, Suite 200
Sacramento, CA 95816

Dear Mr. Ueltzen:

Castle Rock State Park: Preliminary General Plan and Draft Environmental Impact Report (DEIR).

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this project. We have examined the above-mentioned document and would like to offer the following comments:

- a. A more in-depth analysis should be completed prior to the implementation of the Plan to specifically address the traffic issues. The study should include forecasted traffic volumes for SR 9 and SR 35 using existing and background traffic counts, as well as expected traffic generated by the project.
- b. On page 107 of the document, it is assumed that each campsite will generate two (2) trips per day. Please state the reasoning behind this assumption.
- c. Traffic impacts resulting from the development of a multi-agency visitor center at the northwest corner of the intersection of SR 9 and SR 35 should be mitigated to handle the traffic problems identified on page 107 of the Plan. Mitigation measures on or adjacent to State routes should meet the Caltrans' design standards, as stated on page 111.
- d. As noted in our previous letter in response to the Notice of Preparation (NOP), any work or traffic control measure proposed within the State right-of-way will require an encroachment permit from Caltrans. To apply for a permit, the applicant will need to submit a completed application form, environmental documentation, and five (5) sets of plans, in metric units, to the following address:

93

Ueltzen/SCL035005

April 8, 1999

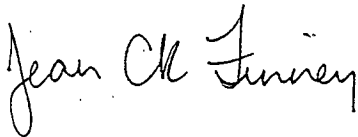
Page 2

G.J. Battaglini, District Office Chief
Caltrans, District 4
Office of Permits
P.O. Box 23660
Oakland, CA 94623-0660

We appreciate the opportunity to work with you on this project. If you have any question or concerns regarding this letter, please call Abbe Hoenscheid of my staff at (510) 622-1643.

Sincerely,

HARRY Y. YAHATA
District Director

By: 

JEAN C.R. FINNEY
District Branch Chief
IGR/CEQA

c: DWynn, SCH

RE: Castle Rock State Park

4-12-99

Dear Gentlemen

I would like to ask you to please include access to Bicycles on Roads, and as many trails as possible. Also build connecting trails within park for more useful area. as a avid Mt Biker and hiker, also a State Parks pass member I hope you consider my Request.

Thank-you
Tim Gillet

94

County of Santa Clara

Environmental Resources Agency
Parks and Recreation Department

298 Garden Hill Drive
Los Gatos, California 95032
(408) 358-3741 FAX 358-3245
Reservations (408) 358-3751 TDD (408) 356-7146
www.parkhere.org



March 25, 1999

Robert Ueltzen
Northern Service Center
State of California Department of Parks and Recreation
1725 23rd Street, Suite 200
Sacramento, CA 95816

Re: Preliminary General Plan and Draft EIR - Castle Rock State Park


Mr. Ueltzen:

Thank you for the opportunity to comment on the Castle Rock State Park Preliminary General Plan and Draft EIR. The County Parks Department's comments follow.

1. The Plan -Page 98. Multi-agency Visitor Center Concept. The County Parks Department does want to be included, as suggested in the state guidelines, in the development of a multi-agency visitor center in the Summit Road area. The County Parks Department contact with regard to interpretive programs and displays is Robin Schaut, Interpretive Coordinator 408- 354-2752.
2. The Plan - Page 92-93 and Draft EIR Land Use & Facility Guidelines Map- Roadside Parking. This land use map indicates the intention to:
 - *"Upgrade roadside parking lots along Highway 9 for day use parking and trail access between Saratoga Gap and Waterman Gap (Red Mtn. Oil Creek, Sempervirens Pt. And Watermen Gap); and*
 - *Evaluate other roadside parking for possible removal or continued use."*As access for County parks visitors to upper Sanborn County Park is limited to the roadside parking areas, the County Parks Department must be included in any future parking studies associated with this area. Information about any future parking studies should be directed to Lisa Killough, Planning and Development Manager 408-358-3741 ext. 154.

If you have any questions about these comments, or need any further information, please do not hesitate to contact the County Parks Department.

Sincerely,


Julie Bondurant
Park Planner

cc: Lisa Killough, Planning and Development Manager
John Maciel, Maintenance Division Manager
Robin Schaut, Interpretive Coordinator
Sanborn County Park Field Staff



Board of Supervisors: Donald F. Gage, Blanca Alvarado, Peter McHugh, James T. Beall Jr., S. Joseph Simitian
County Executive: Richard Wittenberg

h/castlerk/jb

County of Santa Clara

Environmental Resources Agency
Planning Office

County Government Center, East Wing, 7th Floor
70 West Hedding Street
San Jose, California 95110-1705
(408) 299-2454 FAX 279-8537



April 14, 1999

Robert Ueltzen
Northern Service Center
Department of Parks and Recreation
1725 23rd Street Suite 200
Sacramento, CA 95816

Re: Castle Rock State Park Draft General Plan / Environmental Impact Report

Dear Mr. Ueltzen:


Thank you for the opportunity to comment on the Draft General Plan / Environmental Impact Report for Castle Rock State Park. Overall, the proposal appears environmentally conscientious, and we offer the following comments:

1. In the environmental analysis sections addressing protection and preservation of Castle Rock's rare tafoni formations, we recommend using stronger policy language (i.e., use "shall" or "will" instead of "should").
2. In the environmental analysis sections addressing protection and preservation of Castle Rock's two rare natural plant communities (white alder riparian forest and knobcone pine forest), we recommend clarifying the mitigations to be implemented as part of this General Plan. As currently stated, it is not clear what, if anything, is being done to ensure the long-term survival of these two rare plant communities.
3. We commend your efforts toward public participation in and awareness of each stage in the planning process for Castle Rock State Park, particularly in the formation of a citizen's advisory committee, and creation of a "Castle Rock State Park General Plan" newsletter.
4. Finally, we recognize and commend you for formulating policies which seek not only to preserve and to protect Castle Rock's natural and cultural resources, but also to restore specific elements thereof over time.

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The County Planning Office appreciates the lengthy and detailed process involved in preparing General Plans and Environmental Impact Reports, and encourages the Department of Parks and Recreation in this endeavor. Should any questions arise regarding these comments, please feel free to contact me at (408) 299-2454, ext. 235.

Sincerely,

Hugh Graham
Principal Planner

California Native Plant Society

Position Statement

Castle Rock State Park Preliminary General Management Plan

FINDINGS

Upon reviewing the *Preliminary General Management Plan* for Castle Rock State Park, the Santa Cruz County Chapter of the California Native Plant Society (CNPS) finds that:

- 1) The plan is in violation of the California Environmental Quality Act (CEQA) because it
 - a) fails to identify the ecologically superior alternative;
 - b) fails to identify significant environmental impacts of the preferred alternative;
 - c) fails to mitigate to a less than significant level the unavoidable impacts associated with shifting visitor impact to the Partridge Farm Resource Management Zone.
- 2) The plan is in violation of the California Public Resources Code Sec. 5001.96 and 5019.5 because, instead of determining the land carrying capacity based on the ecological constraints of the park, the plan assigns the land carrying capacity based on the perceived operational needs of the Department of Parks and Recreation;
- 3) The plan is in violation of the Department of Parks and Recreation Resource Management Directives #9 and #27 because the boundaries of the natural preserve fail to adequately encompass the important watershed influences and ecologically significant resources of the park;
- 2) The preferred alternative is not the ecologically superior alternative;
- 3) The plan fails to provide baseline ecological data on sensitive habitats;
- 4) The preferred alternative fails to mitigate unavoidable ecological impacts to a less than significant level;
- 5) The plan fails to mandate resource management directives;
- 6) While the plan requires a Rock Climbing Plan and several plans to develop facilities in the park, the plan fails to require development of a Resource Management Plan; and,
- 7) The plan does not recognize the park as a critical core ecological reserve in the Santa Cruz Mountains.

POSITION

It is the position of the Santa Cruz County Chapter of CNPS that the Department of Parks and Recreation should present for public review a *Revised Preliminary General Plan* for Castle Rock State Park that complies with the California Environmental Quality Act, the California Public Resources Code, and the Department of Parks and Recreation Resource Management Directives. Since both the Wilderness Designation Alternative and the Preservation Priority Alternative are ecologically superior to the preferred alternative, CNPS requests that the preferred alternative embrace the values of both through designation of the majority of the park as a natural preserve. The purpose of the park under the Preservation Priority Alternative should be to restore the park to a designated wilderness area. The statement of purpose should be unambiguous and should set the legally defined term "wilderness" as a long-term goal.

Adopted by the Board by Unanimous Vote on 4/12/99



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California Native Plant Society

Robert Ueltzen
Northern Service Center
Department of Parks and Recreation
1725 23rd St., Suite 200
Sacramento, CA 95816

4/15/99

Dear Mr. Ueltzen,

I am writing to you on behalf of the 300 members of the Santa Cruz County Chapter of the California Native Plant Society (CNPS) in regards to the *Preliminary General Plan* (PGP) for Castle Rock State Park (CRSP). While CNPS is supportive of the need to develop a plan to manage human usage at CRSP, we are extremely concerned that the plan as it is currently drafted fails to provide adequate protection for the unique biotic resources of the park. In particular, we are concerned that the PGP is in violation of 1) the California Environmental Quality Act (CEQA), 2) the California Public Resources Code (PRC), and 3) the Department of Parks and Recreation's own Resource Management Directives (RMD). Furthermore, CNPS specifically disagrees with the conclusion that the PGP mitigates all environmental effects to a less than significant level. Without the inclusion of even cursory ecological surveys, it is impossible for the public to adequately assess the impacts of this plan. For this reason, CNPS requests that the Department of Parks and Recreation (DPR) prepare a *Revised Preliminary General Plan* that is in compliance with the applicable portions of the PRC and RMDs.

Please respond to the following concerns:

1) The PGP violates CEQA

CEQA requires that an environmental impact report (EIR) provide plan alternatives. Also, the EIR must identify which alternative is the ecologically superior alternative. The PGP is considered an Environmental Impact Report as required under PRC Sections 5002.2 and 21000 et seq. (PGP, Page 101). In the event that the environmentally superior alternative is not chosen as the preferred alternative, CEQA requires that the lead agency provide an explanation for why the superior alternative was not chosen. While the PGP does provide four alternatives to the preferred alternative, it fails to identify the ecologically superior alternative. Given the strong legal protection afforded to lands under the PRC, CNPS recognizes that both the Wilderness Priority Alternative and the Preservation Priority Alternative are ecologically superior to the preferred alternative.

Why has DPR failed to identify the ecologically superior alternative? Why has DPR presented a plan that is not based on the ecologically superior alternative? Please identify both the Wilderness Priority Alternative and the Preservation Priority Alternative as ecologically superior to the preferred alternative. In the event that neither of these alternatives is chosen as the preferred alternative, please provide an explanation why the ecologically superior alternative was not chosen.

CEQA requires that an EIR identify the ecological effects of the preferred alternative. If these effects are found to be significant and unmitigatable, then the lead agency must make a finding of overriding consideration. CNPS is extremely concerned about the ecological impacts of the Preferred Alternative on the Black Oak Woodland.

When viewed as an isolated Resource Management Zone (RMZ), the level of environmental degradation at Partridge Farm does make it appear to be the best place for development. However, when viewed within the context of the surrounding ecosystem, impacts created by shifting visitor use to Partridge farm will be significant. CNPS and the Audubon Society recognize the black oak forest as a significant natural resource. Both organizations have raised several concerns during the scoping phase of the PGP concerning the impact



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of shifting primary visitor contact to the Partridge Farm RMZ (see CNPS letters dated 3/5/98 and 10/11/98, attached). Redirecting primary visitor contact to Partridge Farm will undoubtedly increase impact within the forest. Direct visitor impacts include soil compaction, trampling of plants, increased nighttime lighting, and disruption of wildlife (including songbirds and mammals) that may be of importance to native plant populations. The PGP fails to identify these impacts to the Black Oak Forest as significant. Furthermore, the plan fails to provide mitigations to decrease the impact of the plan on the Black Oak Forest to a less than significant level.

CNPS disagrees with the finding that "These impacts (those resulting from increased public use and development of facilities) can be mitigated to a level of non-significance with proper design and siting of facilities, resource management programs, and specific mitigation measures" (PGP pg. 111). Since the PGP lacks an ecological analysis of the impacts to the Black Oak Forest, lacks environmental survey data for any section of the park, lacks a requirement for a Resource Management Plan, lacks an analysis of how DPR will institute monitoring, and lacks an analysis of where DPR will obtain sufficient funding for an adequate monitoring program, CNPS believes that the level of use for Partridge Farm proposed by the PGP will create a significant, unavoidable impact. CNPS also disagrees with the statement that "... the impacts (of facility development) can be reversed through removal of the facilities and discontinued use." (PGP pg. 118) This statement infers that site development can indeed cause significant impact. It also implies that changes in park management will not be instituted until after significant impacts have occurred. Hence, these unavoidable significant impacts have not been mitigated for. Recent experiences with DPR has convinced CNPS that DPR lacks the will to change proposed facility development even when that development has been shown to create a significant impact (the most recent example of this trend being the highly contentious development of parking facilities at Grey Whale Ranch).

For these reasons, CNPS believes that development of the Partridge Farm RMZ as proposed in the preferred alternative constitutes a significant, unavoidable impact. CNPS further contends that in order to adopt the PGP as written, DPR must make a finding of overriding considerations for this unavoidable, unmitigated impact.

Please describe the effects the preferred alternative will have on the Black Oak Forest. This description should 1) include recent survey data, 2) identify significant ecological impacts of increased human visitation, and 3) propose specific mitigations related to these impacts. The analysis should include a requirement to develop a Resource Management Plan prior to any development plans for the park, including any development in the Partridge Farm RMZ. What mitigation does DPR propose to lessen the plan's effect on the Black Oak Forest? In the event that proposed monitoring indicates significant impact, how will DPR restore impacted ecosystems? Given that attempts to plant Black Oaks at the Partridge Farm site have been largely unsuccessful, what action will DPR take to mitigate the plan's effect on overly impacted ecosystems? In the event that mitigations fail to mitigate impacts to a less than significant level, CNPS requests that DPR make a finding of overriding considerations prior to the acceptance of the preferred alternative.

2) The PGP violates PRC Sec. 5001.96 and 5019.5

PRC Sec. 5001.96 and 5019.5 state that "the land carrying capacity shall be determined before any park development plan is made...." (PGP pg. 70). While *Figure 2: Allowable Use Intensity* (PGP pg. 73) defines a use intensity for areas within the park, no data has been supplied to support or justify this carrying capacity determination. In fact, a comparison between *Figure 2* and *Map 5: Resource Management Zones* indicates that the "Wildlands RMZ" is bisected between two different carrying capacities, "Low Use Intensity" and "Moderate Use Intensity". It is likely that lands managed for "wildlands" can only sustain a Low Use Intensity rating if they are to maintain their character as wild. Furthermore, a comparison between *Figure 2* and *Map 1: Plant Communities* shows almost all of the Black Oak Woodland in either a "Moderate Use Intensity" or a "High Use Intensity" carrying capacity. CNPS contends that the Black Oak Woodland can only sustain a "Low Use Intensity" rating. It appears that "land carrying capacity" has not been "determined"



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based on the ecological constraints of the park, but rather has been assigned arbitrarily with no supporting scientific justification.

How has DPR determined their land use carrying capacity? What is the justification for dividing the wildlands RMZ between two different use intensity classes? Why does the majority of the Black Oak Forest appear to be in medium and high use intensity classes? Please provide an analysis of carrying capacity that is based on scientific data. Please explain the reasoning behind the selection of Use Intensity ratings provided in Figure 2 of the PGP. Please analyze the effects of Moderate and High Use Intensity ratings on the significant ecological resources of CRSP.

3) The Preferred Alternative violates State Park RMD's # 9 and # 27

RMD #9 states "Boundaries of wilderness and natural preserves will be established to give full protection to environmental and ecological integrity, from the stand points of watershed influences, scenic and visual unity, cultural values, and other appropriate environmental factors." (PGP pg. 133).

The proposed boundaries for the Natural Preserve fail to "give full protection to environmental and ecological integrity". The proposed Natural Preserve does not encompass the entire Upper San Lorenzo Watershed Ecological Unit (PGP, Map 3), hence failing to include important "watershed influences". Furthermore, the proposed natural preserve bisects both the black oak woodland (PGP pg. 89) and the knobcone pine forest (PGP pg. 109), thus failing to fully encompass "other appropriate environmental factors." Hence, the boundaries of the proposed natural preserve fail to meet the criteria set in RMD #9.

RMD #27 states "Whenever natural elements are recognized in the State Park System as being of special significance requiring protection and preservation, regardless of the classification of the units in which they occur, the Department shall recommend establishment of natural preserves (PRC Section No. 5019.71), to embrace these elements, and to emphasize their recognition and protection."

Since the preferred alternative calls for bisecting both the black oak woodland and the knobcone pine forest, it fails to adequately "embrace" these habitats, both of which are recognized as being of "special significance." Furthermore, since the Natural Preserve fails to encompass the entire Wildlands RMZ, it fails to protect lands identified as significant wilderness.

Why has DPR proposed a preferred alternative that fails to encompass all of the significant ecological resources of the park? Please comply with RMD #9 and RMD #27 by expanding the boundaries of the proposed Natural Preserve to include the entire San Lorenzo Valley Watershed, the entire Black Oak Woodland, and the entire Knobcone Pine Forest.

4) Other General Concerns

Wilderness Designation

Tremendous public comment has been supplied to the DPR at public hearings and in writing supporting the position that CRSP should be managed as wilderness. The PGP fails to provide an adequate analysis of the arguments in favor of a wilderness designation. Even in the event that CRSP fails to qualify as a designated wilderness area, a detailed analysis of wilderness designation can provide the basis for management activities that will direct the park towards wilderness recovery.

There are several compelling reasons to designate CRSP a state wilderness area. Viewed within the context of the Santa Cruz Mountains, CRSP represents a critical core reserve, and it should be given the fullest protection allowable by law in the PGP. (See Enclosed Figures 1 and 2) Long-term management decisions at CRSP will play a pivotal role in any attempt to rewild the Santa Cruz Mountains. Ecologically, the park contains several features that give CRSP a wilderness feel. Besides the largest black oak forest in the Santa



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Cruz Mountains, CRSP has a grove of old-growth redwoods on King's Creek. Much of CRSP remains unexplored, and the CNPS recognizes that species considered extirpated from the Santa Cruz Mountains might still exist in CRSP.

PRC Sec. 5093.33(c) discusses wilderness as "... state-owned land which has retained its primeval character and influence or has been substantially restored to a near natural appearance...." Within the context of the Santa Cruz mountains, CRSP represents one of our best examples and possibilities of restoring wilderness to the mountains. Since it's acquisition, natural processes have been allowed to return to Castle Rock. In fact, the PGP states "Although substantially altered since the arrival of Euro-Americans, the recovering park lands provide a glimpse of the original *primeval character* of the Santa Cruz Mountains The ecological linkage between Castle Rock State Park and other natural areas of the Santa Cruz Mountains is apparent. Little evidence of human occupation is visible from the park." (PGP, pg. 2, *italics* added for emphasis)

PRC Sections 5019.68 and 5093.33 define the conditions for a wilderness designation. The PGP states that CRSP does not qualify for wilderness under PRC Sections 5019.68(a) and (c), and PRC Sections 5093.33(c) (1) and (3) (PGP, Page 116).

PRC Sec. 5019.68(a) and PRC Sec. 5093.33 (c)(1):

"Appears generally to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable."

Since it's acquisition in 1968, CRSP has "been affected primarily by the forces of nature". In comparison to urban areas just 15 miles from the park's boundary, CRSP represents one of our best areas for visitors to enjoy a place "with the imprint of man's work substantially unnoticeable." Designating CRSP as a state wilderness will legally guarantee that CRSP will remain in this state for the next 25 years. Adopting the preferred alternative will allow several development proposals, further degrading the wilderness at the park.

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PRC Sec. 5019.68(c) and PRC Sec. 5093.33 (c)(3):

"Consists of at least 5,000 acres of land, either by itself or in combination with contiguous areas possessing wilderness characteristics, or is of sufficient size as to make practicable its preservation and use in an unimpaired condition."

At 3600 acres, CRSP does not qualify under the 5,000-acre rule. If the adjacent Waterman Gap property (owned by the San Lorenzo Valley Water District and currently under consideration for acquisition and inclusion in CRSP) were included, the area would reach the 5,000-acre threshold. However, even without the inclusion of Waterman Gap, CRSP does qualify under the definition in the PRC. Kept as a functional whole, CRSP "is of sufficient size as to make practicable its preservation and use in an unimpaired condition." When viewed from the perspective of spaciousness, a 3600-acre parcel is actually quite large in the Santa Cruz Mountains. Furthermore, a 3600 acre wilderness designation would increase wilderness in the Santa Cruz Mountains by 72% (currently, there is only one designated wilderness in the Santa Cruz Mountains, a 5,000 acre portion of Big Basin State Park. It should be noted that the boundaries of the Wilderness Area in Big Basin State Park are broken by a road corridor into a large section of the designated wilderness area. See Enclosed Figure).

Why does DPR refuse to designate CRSP a wilderness? If CRSP does not qualify under the PRC, why does the preferred alternative propose to further degrade the existing wilderness qualities? Please provide a detailed analysis in the PGP that responds to the arguments provided above in favor of Wilderness Designation. In the event that CRSP is still deemed unsuitable for wilderness designation as defined in PRC Sec. 5019.68 and Sec 5093.33, please propose actions DPR will take to restore CRSP to a wilderness condition as defined in the PRC.

Specific Plan Development and Resource Management Goals



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The PGP discusses several specific plans to be developed for the park, including the development of parking and camping at Partridge Farm and a rock climbing plan. The plan also makes room for the development of a gift shop, visitor center, and concessions at the park. No mention is made concerning the development of a Resource Management Plan. Furthermore, while the plan discusses extensively the ecological benefits that would result were a prescribed burn plan to be implemented in CRSP, there is no language indicating that a Prescribed Burn Plan will be developed. Although the PGP presents various resource management goals, these are considered guidelines rather than requirements, and so whether or not to follow resource management goals will be left to the discretion of DPR staff. Hence, despite the apparent inclusion of strong resource management language, there is nothing in the plan that requires DPR staff to follow this language. CNPS concludes that the weak language of the plan fails to provide the public with a reasonable expectation that ecological integrity will be maintained at CRSP.

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Why has no Resource Management Plan been specified for CRSP? In what order will DPR develop specific plans for the park? Why does DPR consider resource management goals to be guidelines rather than? How can the public be guaranteed that DPR will follow these guidelines? Please include a list of all specific plans proposed within the PGP. Please prioritize this list by providing the order in which these specific plans will be developed. Please include the development of a Resource Management Plan, and please require this plan to be instituted prior to the development of any other specific plans. This Resource Management Plan should include specific guidelines for the appropriate management of the various ecological communities in the park. Please change the language of the PGP in such a way as to make resource management goals requirements rather than recommendations.

5) Other Specific Concerns

SECTION 1: EXISTING CONDITIONS

Page 11 *Special Plants*

Please include requirements for surveys for special plant species in the park. This should be included in the Resource Management Plan requested by CNPS. Please provide reference to any past ecological surveys in the park, particularly as these studies relate to sensitive plant species.

105

Page 12 *Exotic Species*

Please include dogtail grass (*Cynosurus echinatus*), an annual non-native invasive grass that is adversely effecting the understory of the black oak forest. How will institution of a burn management plan help control this species? Also, please include Cape Ivy, Pampas Grass, Tall Fescue, and Hemlock as potential species at CRSP that should be monitored for and considered considered high priority for removal.

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Page 41 *Subclassification*

Why is "Wilderness" not included in this section? Please include "wilderness designation" as a possible subclassification for a state park unit. Please include the text of PRC Sec. 5019.68 and PRC Sec. 5093.33 within the "Subclassification" section of the plan.

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Page 44 - 45 *Public Access, Development, and Use of the Partridge Farm Area*

The PGP provides an insufficient analysis concerning a need to shift primary visitor contact to the Partridge Farm RMZ. Why has DPR set the "three primary goals" for development of Partridge? How does the existing parking area fail "to provide and manage recreational uses in such a way as to minimize resource impacts?" Why is the existing parking area unable "to establish a primary contact location to orient visitors to recreational opportunities and educate them about resource values?" Why is the existing parking area unable "to improve manageability of visitor parking?" In fact, none of the primary goals is likely to be achieved since the PGP calls for keeping the existing parking area open. Furthermore, since DPR is unable to provide adequate staffing for the existing parking, it is questionable at best to conclude that shifting primary visitor contact to the Partridge Farm RMZ will result in greater management of recreational impacts to the park. Please provide a detailed analysis justifying the need to shift primary visitor contact to the Partridge Farm RMZ.

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Page 47 *Statewide Camping Interest and Lack of Overnight Accommodations*

The PGP fails to provide a compelling reason for the proposal that overnight car camping or walk-in camping is necessary at the Partridge Farm RMZ. In fact, the plan itself identifies three different parks within 15 miles of CRSP that provide for this sort of recreational activity. Public comment has identified a recreational need for a wilderness camping experience in the Santa Cruz mountains. How will this PGP provide the public with a wilderness experience? How will the proposed action effect the quality of wilderness experiences in CRSP? Given the close availability of camping facilities, why has the PGP proposed even more such facilities for the Santa Cruz Mountains? Why has walk-in camping been afforded priority over wilderness camping? How will increased visitation effect the quality of visitor experience of the Lion Caves, Goat Rock, and the Black Oak Forest?

109

Page 48 *Managing Resources and Visitor Impacts*

The vague wording of this section fails to ensure to the public that ecological management goals will be consistent with the recreational goals of the park. In order to mitigate for the effects of the preferred alternative, the PGP must ensure that the proposed action will not create a significant environmental impact. CRSP represents one of the critical core reserves in the Santa Cruz mountains, and so ALL visitor impacts should be considered as having a significant effect to the habitat of the park.. CNPS believes that the preferred alternative itself will cause significant ecological impact on the ecological resources of CRSP, including the Black Oak Woodland.

Please change the wording in the first paragraph to indicate that the "Conditions" of the preferred alternative "warrant (that) studies (be) implemented to provide further assessment of conditions and monitoring (be) initiated to compare changes."

CNPS believes that it should be the "goal of the Department to apply processes and methods of visitor impact analysis to minimize resource impacts and maintain appropriate types and levels of visitor use within this unit" AT ALL TIMES, not only "where feasible and necessary". The last sentence of the first paragraph should be changed to reflect this.

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In the second paragraph, please change the word "can" to "will" and "considered" to "taken". In this way the first two sentences read:

"The collection of baseline information, establishment of resource monitoring, and the setting of standards WILL be used to establish appropriate resource and social conditions in recreational settings. When actions threaten to exceed standards, actions will be TAKEN to bring resource conditions within expected limits."

CNPS does not believe that when a "system is stable" that it should be subject to increases in carrying capacity, to be monitored to determine effects. Disturbance within stable ecosystems creates instability. Although the plan states that a "monitoring cycle" avoids "setting arbitrary limits for carrying capacity", the PGP itself is based on an arbitrary carrying capacity determination. How does the DPR define a "stable" system? How will DPR set "standards" that are not to be "exceeded"? What "standards" will be set? What "action" does DPR anticipate to take to restore habitat that has been allowed to "exceed standards"? What sort of monitoring will occur? How will DPR afford this monitoring?

Section 2: *The Plan*

Page 52- 53 *Wildlands, Declaration of Purpose, and Unit Vision*

The original Statement of Purpose for CRSP contains language stating that the park is to be managed so as to preserve it in a "near-wilderness" state. According to PRC Section 5019.53, " Each state park shall be managed as a composite whole in order to restore, protect, and maintain its native environmental complexes to the extent compatible with the primary purpose *for which the park was established*" (*italics added for emphasis*). Clearly, the founders of CRSP viewed the park's wilderness value to be of primary importance. The Declaration of Purpose in the PGP has removed the "near-wilderness" language from the purpose and replaced it with a "wildlands" definition. Justification for this has stemmed from the belief that "near-

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wilderness" is a meaningless statement. DPR has refused to use the term "wilderness" in the statement of purpose because it has a defined meaning in the PRC.

CNPS believes that there is no justification for DPR to refuse to use the term "wilderness". In fact, using that word will guarantee a greater level of legal protection for CRSP than the much weaker "wildland values" used in the PGP. Why has DPR refused to use the legally defined term "wilderness" in the statement of purpose?

CNPS supports the position that the purpose of the park should be to restore "wilderness". The statement of purpose should be unambiguous and should include the legally defined term "wilderness". Please replace the term "wildland values" with the term "wilderness" in the Declaration of Purpose.

Page 54 General Unit Management Goals and Guidelines

While the PGP does provide several valuable resource management goals, these are considered guidelines rather than directives. Hence, there can be no expectation by the public that DPR must respect the guidelines presented in the plan. The public cannot reasonably accept that the resource management goals will be adhered to. "Guidelines" do not provide adequate mitigation for the effect of the implementation of the preferred alternative.

112

Please change all Resource Management "Guidelines" into "Directives".

Page 59 Natural Resources

The PGP states that "A comprehensive resource management program should be established for the management of natural processes and elements at Castle Rock State Park." What is meant by a "program"? Will a Resource Management Plan be included with this "program"? Will this "resource management program" be subjected to public review under CEQA? Given the significant beneficial effects that fire will provide to the habitats at CRSP, will this "program" include the adoption of a Prescribed Burn Plan? In what time-frame will the establishment of this program compare to the establishment of the rock climbing plan or any specific plans to develop in the Partridge Farm RMZ?

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Please require the development of a Resource Management Plan that includes prescribed burning. Please provide a timeline for plan development that makes a Resource Management Plan the first plan to be developed.

Page 60

Please provide a directive to institute a prescribed burn plan.

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Page 62

The information provided throughout the PGP indicates that fire reintroduction should be "deemed necessary". Please provide a directive to institute a prescribed burn plan.

Page 63

Mention is made of a "Vegetation Management Plan" under the section concerning wildlife management. Why is there no mention of a WILDLIFE management plan? Since development of the proposed Vegetation Management Plan will only protect and perpetuate native wildlife populations "in part", how will DPR further protect and perpetuate these populations? Given that the listed guidelines contain the verbs "should" rather than "will", what expectation can the public have that the proposed guidelines will be adhered to?

115

Please provide for the development of a Resource Management Plan that includes an analysis of habitat management needs for the wildlife of the park. Please prioritize the development of this plan such that it will be administered prior to the proposal of any specific plans aimed at providing visitor facilities.

Page 64 Biocorridors



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CNPS strongly supports the inclusion of language in the plan that recognizes the importance of habitat connectivity issues in CRSP. The movement of both animal and plants through time can only be guaranteed if corridors are protected (See Attached Figure 2). The interconnectivity of habitats should be a central feature of the PGP. However, the weak wording of the goal of the biocorridor section fails to provide the public with an adequate expectation that linkages in the park will be protected. Please delete the phrase "whenever possible" from the goal of the biocorridor section.

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Furthermore, the PGP fails to analyze CRSP within the context of larger scale connectivity issues. (See Attached Figure 1). Given the wilderness character of the park as well as its regional importance, CNPS recognizes CRSP as a critical core reserve. Please identify CRSP as a core reserve at a regional level. How will creation of an 1800 acre natural preserve within CRSP effect the designation of core reserve status? Will the Wilderness Priority Alternative or the Preservation Priority Alternative provide a greater core reserve than the preferred alternative? How will this effect total core reserve acreage within the Santa Cruz Mountains? Will the proposed action in the PGP have a significant ecological impact (as per CEQA) on the Santa Cruz Mountain bioregion? How will DPR mitigate the effect of only protecting 50% of CRSP in a legally defined category?

Page 68 Esthetic Resources

Despite public comment concerning the importance of darkness as a resource at CRSP, the PGP fails to identify darkness as an important esthetic resource. Please identify the impacts of light at CRSP, including light from facilities, light from flashlights, and light from camp fires. How will loss of darkness affect the park's wilderness quality?

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Pages 70 – 73 Carrying Capacity

It is the position of CNPS that the Carrying Capacity has not been determined using scientific principles. CNPS specifically questions the assignment of carrying capacity that is based on operational needs rather than the habitat needs of CRSP. The carrying capacity provided in the PGP violates PRC Sec. 5001.96 and 5019.5. Please provide a revised carrying capacity analysis that is based on scientific principles and data.

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Page 74 Unitwide Access and Trails

The PGP calls for an increase in trails at CRSP of "about 10 miles", but nowhere does the plan identify the areas where DPR anticipates building new trails. CNPS recognizes the need for a Unit Trails Plan. However, as an EIR, CNPS believes that the PGP must analyze the impacts of the proposed trails plan, and where these impacts are considered significant, mitigations must be offered to bring impacts to a less than significant levels. DPR has informed CNPS at several public hearings that it is appropriate for a general plan to identify areas where new trail development WILL NOT occur. The PGP fails to limit trail development in any critical habitat.

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Please include specific language that prohibits new trail development in sensitive habitats, including the Black Oak Woodland, White Alder Riparian, Knobcone Forest, and old-growth redwood groves.

Page 81 Unitwide Concessions

CNPS believes that the introduction of concession facilities at CRSP should be considered a significant unavoidable environmental impact to the essential wilderness character of CRSP. Such facilities will introduce increased visitation impacts to the park that cannot be mitigated to a less than significant level. These include: increased trash, increased noise pollution, and increased dependence of wildlife on human supplied food sources. Please prohibit the development of concessions at CRSP.

120

Pages 82 – 85 Natural Preserve Area

CNPS finds that the boundaries for the proposed natural preserve are insufficient to meet the standards of RMDs #9 and #27. Please provide a *Revised Preliminary General Plan* that is consistent with DPR's stated directives.

121

Pages 85 – 88 Partridge Farm Area



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CNPS finds that the PGP fails to mitigate to a less than significant level the ecological impacts on the Black Oak Woodland associated with shifting visitor impact to the Partridge Farm RMZ. Please include a finding of overriding considerations in conjunction with the adoption of the preferred alternative. Alternatively, please provide language in the PGP that will meet a public expectation that sensitive ecological resources WILL be protected. Please provide a *Revised Preliminary General Plan* that expands the boundaries of CRSP.

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Pages 90 – 93

Nowhere in this section is there a requirement to decrease parking at the existing lot at CRSP. In fact, the evaluation provided for the preferred alternative indicates that the existing parking area will be maintained (PGP, page 112). Furthermore, the plan fails to identify how DPR will overcome CalTrans publicly stated refusal to close parking in their right-of-way along State highway 35 (a requirement of Phase 1, PGP page 91). The phasing of parking over time allows the existing lot to be left open as an “alternative” to closing it. The wording of this section fails to provide the public with a reasonable expectation that existing parking will be closed under the preferred alternative, and so does not provide an adequate mitigation for the effect of shifting visitor impact to the Partridge Farm Resource Management Zone. How will DPR close sections of the existing parking? What habitat restoration techniques will be required in closed parking lots? How will DPR secure the funding to institute parking closure at the existing parking lot? Has CalTrans agreed in writing to DPRs request that “no-parking” signs will be posted in the CalTrans right-of-way along highway 35? How will the refusal by CalTrans to comply with DPRs request effect the analysis of the preferred alternative? Will DPR ONLY develop parking at Partridge Farm if CalTrans closes existing free parking on Highway 35?

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Page 93 Overnight Use Facilities

DPR has failed to identify the need for new overnight facilities in the Santa Cruz mountains, as these are provided at nearby parks. DPR has failed to address the public need of a wilderness experience in the Santa Cruz mountains. Please provide a *Revised Preliminary General Plan* that limits new development of visitor facilities in CRSP so as to maintain CRSP as wilderness.

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Section 3: Environmental Analysis

Pages 101 – 120

CNPS finds the PGP to be in violation of CEQA because

- a) the PGP fails to identify the ecologically superior alternative;
- b) the PGP fails to identify significant environmental impacts of the preferred alternative;
- c) the PGP fails to mitigate to a less than significant level the unavoidable impacts associated with shifting visitor impact to the Partridge Farm RMZ.

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Please provide for public comment a *Revised Preliminary General Plan* that is accordance with CEQA. Since both the Wilderness Designation Alternative and the Preservation Priority Alternative are ecologically superior to the preferred alternative, CNPS requests that the preferred alternative embrace the values of both through designation of the majority of the park as a natural preserve. The purpose of the park under the Preservation Priority Alternative should be to restore the park to a designated wilderness area. The statement of purpose should be unambiguous and should set the legally defined term “wilderness” as a long-term goal.



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Appendices

Page 123 Appendix A

What is the source for the information provided in this list? Have any focused surveys been attempted for botanical resources at CRSP? Please include references to all available ecological data for CRSP.

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Maps

Please include metadata sources for the maps presented in Maps 1, 2, and 3. What is the scale of these maps? Is it appropriate for DPR to use metadata from these maps at the scale presented in the PGP? Have any of the metadata sets been field checked? What are the limitations of the metadata sets presented in these three maps? How are the "Ecological Units" in Map 3 determined? To what species do these "Ecological Units" apply?

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Concluding Remarks

CNPS wishes to thank DPR for their continued perseverance in developing a *General Plan* for CRSP that conforms to the requirements of CEQA. During the scoping of the plan, DPR consistently responded to CNPS's concerns. However, despite our input during scoping, the PGP still fails to mitigate the effect of the preferred alternative to a less than significant level. Given the many violations CNPS has found in the PGP, there is no way for the public to adequately assess the effect of the proposed action.

CNPS requests that DPR present for public review a *Revised Preliminary General Plan* that conforms to state laws and department directives. We request that this revised plan provide the public with a reasonable expectation that the resource management goals of CRSP will maintain the park's wilderness value.

Thank you for taking into account our concerns. CNPS looks forward to working with DPR to develop a *General Plan* that fulfills DPR's mission

Sincerely yours,

 4/15/99

Joe Rigney

Co-Chair, Conservation Committee

Santa Cruz County Chapter of the California Native Plant Society

PO Box 8098

Santa Cruz, CA 95061

wildlands@butterflydreams.com

cc:

Fred Keeley, California State Assembly

Jeff Almquist, Santa Cruz County Board of Supervisors

Deb Hillyard, California Department of Fish and Game

Jeanine DeWald, California Department of Fish and Game

Barry Boulton, Sierra Club

Rich Hunter, California Wilderness Coalition

Bruce Bettencort, Friends of Castle Rock State Park

Steve Singer, Santa Cruz Mountains Bioregional Council



Dedicated to the preservation of California native flora



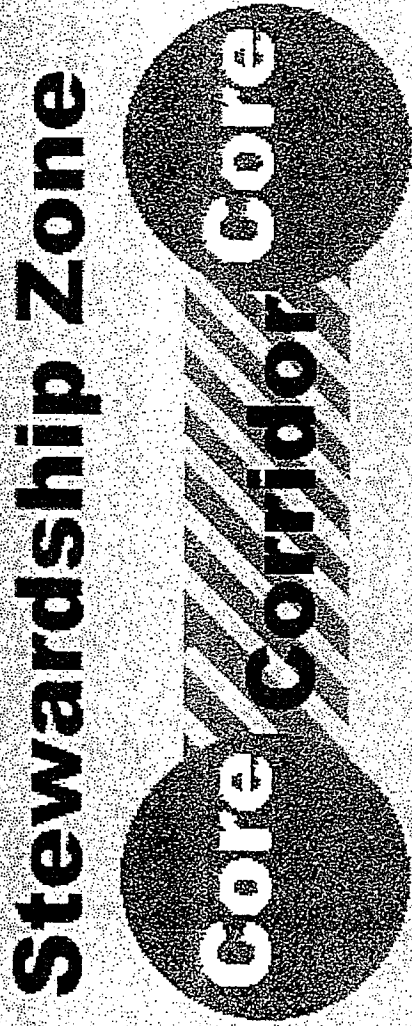


Figure 2: The Central Paradigm of Reserve Design
Adapted from Reed Noss,
"The Wildlands Project: Land Conservation Strategy",
Wild Earth, Special Issue, 1992

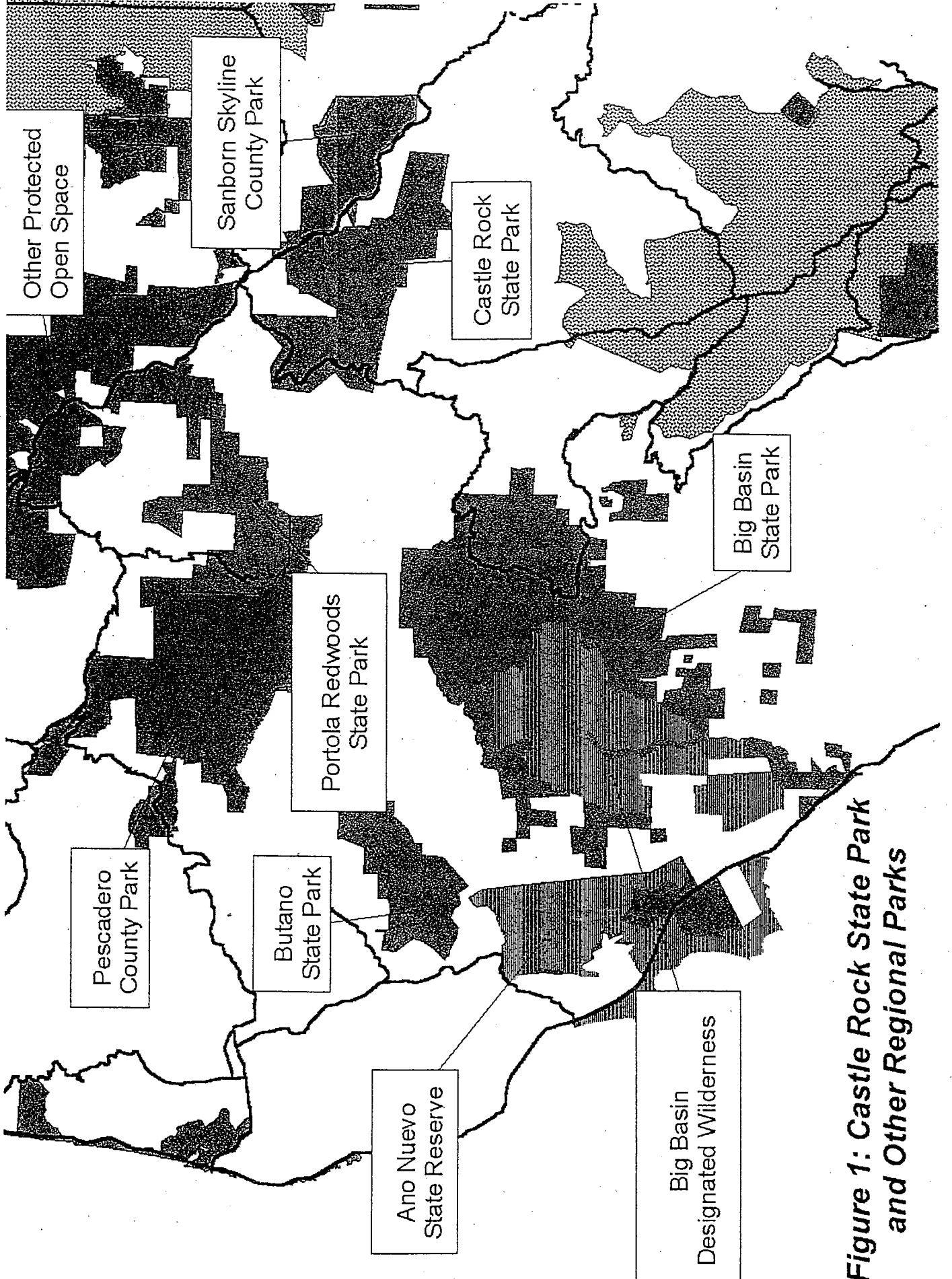


Figure 1: Castle Rock State Park and Other Regional Parks

10/11/98

Dave Keck
California Department of Parks and Recreation
Castle Rock State Park GMP Coordinator
1725 23rd St., Suite 200
Sacramento, CA 95816

Dear Mr. Keck,

I am writing to you on behalf of the Santa Cruz County Chapter of the California Native Plant Society concerning the General Management Plan (GMP) that is currently being developed for Castle Rock State Park. As I stated in the letter dated 3/5/98, our chapter is very concerned about the impacts of the plan, particularly as it relates to the development and expansion of facilities at the old Partridge Farm site. We are concerned that the levels of visitor use projected by the plan will significantly impact the sensitive biological resources such as the Black Oak Forest. While the Park has proposed implementing the concept of Limits of Acceptable Change (LAC) to the GMP, there is no evidence to indicate that LAC has the ability to protect ecological resources. In fact, LAC does not allow for changes in management until after these limits have been exceeded. It is our concern that by the time significant impacts have been identified to sensitive ecological resources it may be too late to impose changes that will allow for recovery. In fact it is even questionable whether or not State Parks has the financial resources to implement the level of monitoring required for LAC to be adequately evaluated in an appropriate scientific manner. Furthermore, LAC is an untried method for the State Parks, and may simply not be applicable to its management process.

CEQA requires that environmental documents contain project alternatives. Our chapter believes that an adequate plan can be developed that will achieve the goal of facilitating visitor access to the park while limiting impact to ecologically sensitive areas. In fact, the elements of that plan have been brought up to the Park's Department on several occasions during the process which the State Parks has established for writing the GMP. For this reason, we request that the Draft GMP include the enclosed project alternative.

It should also be noted that our chapter supports the inclusion in the park's Statement Of Purpose language that clearly and unambiguously states that management of Castle Rock State Park will be for the preservation of the park in a "near-wilderness state". This language appeared in the original draft statement of purpose, but was subsequently removed. We request that the Draft GMP includes this language.

Thank you for considering our proposal for inclusion in the draft GMP. Feel free to contact me for further clarification of our position.

Sincerely Yours,

Joe Rigney
Co-chair, Conservation Committee
Santa Cruz County Chapter, California Native Plant Society
PO Box 8098
Santa Cruz, CA 95061
(831)425-3238
webmaster@butterflydreams.com

cc:
Dave Vincent, Superintendent, Santa Cruz Parks District
Bruce Bettencort, Friends of Castle Rock State Park
Jeff Almquist, Santa Cruz County Board of Supervisors
Fred Keeley, California State Assemblyman, XX District

3/5/98

Dave Keck
California Department of Parks and Recreation
Castle Rock State Park GMP Coordinator
1725 23rd St., Suite 200
Sacramento, CA
95816

Dear Mr. Keck,

The Santa Cruz County Chapter of the California Native Plant Society has several concerns regarding the General Management Plan for Castle Rock State Park that is currently being developed by your office. Please consider the following as you develop the draft document.

- 1) While we recognize the advantages of the proposed campground at Partridge Farm, we are concerned that such a site would create significant impact on the nearby black oak forest. Since this management plan is likely to direct decisions for the next few decades, we encourage you to include alternatives to this site.
- 2) We strongly support the concept of the 2,000 acre Natural Preserve. However, we would like to see the black oak forest included in the preserve in its entirety. This important resource contains the highest biodiversity within the park (both in terms of flora and fauna), yet only about 40% of this important biological resource is currently slated for inclusion in the preserve.
- 3) Large areas of the park remain unexplored. There is a great potential that plants believed to have been extirpated from Santa Cruz County still exist within the park. We urge the Parks and Recreation Department to create an ongoing inventory and monitoring of the plant communities within the park. Such an inventory would greatly aid park staff in making management decisions based on sound biological data.
- 4) We believe that the management plan should include specific guidelines for the appropriate management of the various ecological communities in the park. An example would be the inclusion of fire management plans for the park, especially as they effect the control of dogtail grass (*Cynosurus echinatus*), an annual non-native invasive grass that is adversely effecting the understory of the black oak forest. Another example would be to create guidelines for the protection and enhancement of the large trees found in the park, particularly the large canyon oaks found on the ridge near Partridge Farm. Another example would be to consider the effects of hiking in the riparian corridor near the waterfall, and to include an alternative route to the falls which avoids this sensitive habitat.

- 5) Currently there are two old-growth redwood groves in local area state parks that are readily accessible to the public (Big Basin State Park and Henry Cowell State Park). While we recognize the need for interpretive trails as a way to educate people, we feel that it is also important to preserve some ecosystems in an undeveloped state. For this reason, we support the addition of language in the management plan that will make the old-growth redwoods on King's Creek off-limits to future trail development. Besides providing habitat to old-growth dependent species, such protection will leave intact a grove that could potentially be used in future comparative studies between undeveloped and developed old-growth within the Santa Cruz Mountains.
- 6) We do not support the development or expansion of mountain bike and equestrian trails in the park. If such trails are deemed necessary, then we encourage a monitoring protocol that gives future resource managers the flexibility and authority to close these trails if they are shown to create a significant negative impact on the ecological resources of the park.
- 7) We are very concerned about the effects of climbing on the vegetated rock surfaces. We propose that the park provide complete protection to the vegetation on these surfaces.

Thank you for taking into account our concerns. We look forward to working with you and your staff in the development of this management plan.

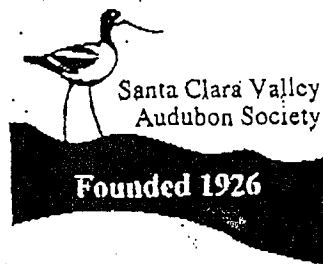
Sincerely Yours,

Joe Rigney
Co-Chair, Conservation Committee
California Native Plant Society, Santa Cruz County Chapter

DRAFT Diffuse Impact Alternative

This alternative will analyze the effects of the following proposal.

- 1) Parking around Castle Rock State Park will be diffused around the edges of the park. The basis for this position comes from the attached memo from Miles Standish to the Castle Rock Advisory Committee that indicates the potential for parking space around the park to be in the range of 288-418 vehicles. The plan should evaluate impacts to the park under such a diffuse parking scenario.
- 2) The only allowable camping in the park will be low-impact, hike-in camping with no facilities for car camping. Existing and potential sites should be given appropriate impact analysis. It should be emphasized that vehicle parking and car camping concentrated on the edge of the proposed preserve would create significant impact to the sensitive ecological resources in the vicinity of Partridge farm, particularly the Black Oak Forest.
- 3) Castle Rock State Park should be declared a State Wilderness Area. The plan should include an analysis of the impacts such a designation would have on the park. The plan should also identify what management activities (such as controlled burning) would be allowable in the park were it declared a State Wilderness Area.



May 14, 1999

David Keck
 Northern Service Center
 California Department of Parks and Recreation
 1725 23rd Street, Suite 200
 Sacramento, CA 95816

RE: Castle Rock State Park Preliminary General Plan and Draft EIR

Dear Mr. Keck,

I appreciate the extension of the deadline for comments to the CRSP General Plan. Following are a few more comments to add to the letter I sent last month. I am interested to know if this plan was reviewed by a wildlife biologist. I see a number of misleading or incorrect statements relating to wildlife, ecosystems and habitat, some of which were brought out in my previous letter. I find this very disturbing in an important document such as this, which will guide the future of CRSP. My recollection is that the earlier draft that I was given opportunity to review last summer, had much better sections on plants, wildlife and ecosystems. I find this general plan seriously lacking and think you should recover much of your earlier wording.

1. P. 15. Second paragraph. "Although not as biologically diverse as ancient forests, these second growth communities provide valuable wildlife habitat." To my knowledge this is an incorrect statement. The plan is missing the point. Mature redwood forests are not very biologically diverse; they are *unique*. They do not support a wide variety of plants because they shade the ground, allowing only shade-loving plants below. Thus there is not a wide variety of animals either. The point here is that Redwood Forests are unique ecosystems that support plants and animals that have unique requirements as well as those that are adaptable to many habitats. Two well-known examples of the former are the Marbled Murrelet and the Spotted Owl, both of which inhabit only old-growth forests and both of which have endangered or special concern status.

128

Consequently, it is not necessarily good to always achieve diversity in any particular setting. It is something that always sounds good to people, but in reality a golf course has more diversity of birds than a mature redwood forest. The point is to preserve native habitat, such that it can be appreciated and enjoyed by the citizens of California in a pristine condition, or as close to that as possible. These unique habitats are also important educational resources for Californians.

2. P. 15, bottom of the page. Proper names of species should be capitalized, e.g. Golden Eagle, etc. Use of the more general names, without the species designation, such as eagles, kestrels, vultures, etc. does not require capitalization.

3. P. 16, third paragraph. "Both highways may impact normal animal movements". I think you should be more specific. For example, a highway wouldn't restrict most birds from moving across, whereas it would restrict snakes and lizards to some extent. Mountain Lions would probably not be affected, as their movements are at night and the very early morning. This section sounds like a set-up for saying that CRSP does not qualify as a state wilderness, when the designation would protect most species that reside there and allow further recovery to take place. This is opposite to what the State Parks position should be.

129

4. p. 16, fourth paragraph, last sentence. "The California grizzly bear....." This sentence referring to Santa Cruz County seems strange and out of place. There are probably a lot more species that could be listed in talking about Santa Cruz County but it doesn't necessarily relate to CRSP. For example, there is no Burrowing Owl habitat in CRSP, and I seriously doubt there were ever any Blue Grosbeaks either.

130

5. p. 16, fourth paragraph. This looks like another support for the idea that CRSP is inappropriate for a wilderness designation. Some of the "Historical Influences" for this area include other topics not covered here, such as attempts at restoration, the care of park personnel and volunteers and the purchase of these lands and gift of them to the Park Service.

131

6. p. 16 Ecological Corridors. The names of species referred to in the first paragraph should be listed. The plan is too generalized here and in many other places such that it is an incomplete report. How can the public make an informed decision on this without knowing what it is you are referring to? I don't think you are fulfilling your responsibility to the public with this report unless you give some specifics.

132

7. P. 16, last paragraph. As I mentioned in my last letter, I have a problem with listing Wild Turkey as exotic, because they are native to California. Although they are invasive and damaging, cowbirds are not technically exotic because they were not introduced by man, but rather moved on their own into this area from the southern part of the U.S. Cowbirds do follow people and agriculture, and they will penetrate fragments of forests to locate prey species for their nest parasitism. It turns out that, for most prey species, large tracts of fairly undisturbed forest are the best defense against cowbirds and that is what we should be shooting for in CRSP.

133

8. P. 17 under "mammals". Please list all the mammals that are California fully protected, and explain what that means. Also list the bats referred to in the last paragraph. Please discuss their habitat requirements and why they may be on the decrease in this area.

134

9. P. 17, under "Birds". Please list the species you are referring to and provide discussion on their habitat requirements so this can be discussed later in the document when it comes to the proposed developments.

135

10. P. 17, under "reptiles" and under "amphibians". Please discuss the habitat requirements of the species of special concern that you list.

11. The Unitwide Resource Management Goals and Guidelines are woefully inadequate to protect wildlife and native habitat. There are not enough stated goals, and the guidelines are inadequate and not detailed enough. The guidelines should be quantitative, otherwise they are all but useless. For example, "manage vegetation toward a natural condition with a minimum of disruption to natural processes". What does that mean? In the same document you propose to route people through Partridge Farm near some of the most sensitive plant communities. How does this fit, and what does it say about the usefulness of your management goal?

136

12. There are important areas that are missed by the Unitwide Resource Management Goals. For example, there should be one that calls for recovery and maintenance of forest tracts to combat habitat fragmentation. Quantitative targets should be set.

137

13. Resource Management goals also need to be more specific. "Protect, preserve and restore natural ecosystem processes and elements" sounds great. But if it is not quantified

138

how will we know if it is being done or even can be done. "Protect springs and seeps" sounds good, but what does that mean? I want to know the specifics of how the native communities in the park are going to be protected. These sound like empty promises. One of my main concerns is, How are they going to be protected in the face of the proposed developments? I don't think they can be without money and staffing that are apparently not available. But if the State Parks thinks they can, I'd like to see the specifics of their plan.

14. Carrying capacities and allowable use intensity sections show no scientific bases for the designations that are made, only excuses as to why it is hard to do. Studies should be done by scientists in order to make these sorts of determinations and I don't see any signs that this has been done.

139

15. P. 108. The discussion of federal and state endangered species is incomplete and does not adequately address each species' issues. The statement about Marbled Murrelets only using old growth stands is not correct. Their nests have been found in trees as young as 180 years and also they will nest in older trees that are surrounded by younger ones. It should be evaluated as to whether other stands in the park fit these other criteria, and also protect other stands as potential future habitat as well by making the whole park a State Wilderness.

140

16. The environmental analysis of the proposed project is incomplete. In particular it does not address the habitat requirements of sensitive species that don't currently have special status, but have been shown to be on the decrease on a regional scale.

141

In summary, I would say that the plan is lacking in a number of areas and badly needs review by qualified scientists. It is clear to me that the proposed developments are in direct conflict with conserving the natural communities of this park. I think a careful review by scientists will show the same.

Sincerely,



Leda Beth Gray

Santa Clara Valley Audubon Society

5/14/99

Robert Ueltzen

Dave Keck

Northern Service Center
Department of Parks and Recreation
1725 23rd St., Suite 200
Sacramento, CA 95816
Fax: 916-324-0888

Dear Mr. Ueltzen and Mr. Keck:

I am writing to you in regards to the Preliminary General Plan (PGP) for Castle Rock State Park (CRSP). I have followed the process of review for this plan through the local Chapters of the Sierra Club and the CA Native Plant Society in Santa Cruz. I support the positions of both groups.

Wilderness means many different things to people, and is vital habitat for species. The next 15 to 20 years will continue to see a growing population in California, and the United States. Growth pressures will become more demanding. It is imperative we preserve and protect what is left of wildlands in California.

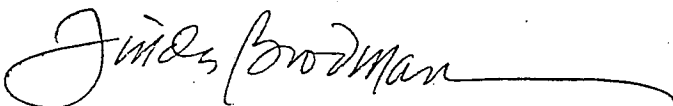
I strongly urge State Parks to:

- not develop Partridge Farm,
- identify and present a plan which is the ecologically superior alternative to the PGP; and
- support both the Wilderness Priority Alternative and the Preservation Priority Alternative as ecologically superior to the preferred alternative.

142

143

Thank you,



Linda Brodman
2121A Ocean St. Extension
Santa Cruz, CA 95060

THE VARIAN FOUNDATION
154 BRYANT STREET
PALO ALTO, CA 94301-1102

May 5, 1999

Mr. Robert Ueltzen
Northern Service Center
State of California
Department of Parks & Recreation
1725 23rd Street, Suite 200
Sacramento, CA 95816

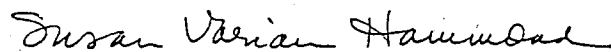
Dear Mr. Ueltzen:

The Board of Directors of the Varian Foundation strongly supports the Castle Rock State Park General Plan as it is in keeping with the dreams and ideals of the founders. Russell Varian traveled to Castle Rock as a boy with his family at the beginning of this century. He fell in love with the unique landscape and came back again to explore its gifts as a student at Stanford University, and later, with his wife, Dorothy, and his family. At the time of his death in 1959, Russell had begun negotiations for the private purchase of the 26 acres surrounding the rock itself. Dorothy dedicated the remainder of her life to fulfilling his dream of establishing a state park and adding adjacent land to expand its perimeter.

144

Our role as board members is to carry out the work started by the Varians and to this end we are committed to Castle Rock as our first priority. The General Plan offers a sound blueprint for the future of the park. We urge the State Parks Commission to adopt the plan.

Sincerely,



Susan Varian Hammond
Secretary-Treasurer

357 Westridge Drive
Portola Valley, CA 94028
April 29, 1999

California State Parks
Northern Service Center
1725 23rd Street, Suite 200
Sacramento, CA 95816

Re: Castle Rock Preliminary General Plan

Gentlemen:

Having hiked Castle Rock State Park for many years, there is no question in my mind but that it would be a mistake to continue managing Castle Rock State Park without changing the name to Castle Rock *Wilderness* State Park. Because the wonderful natural features there are in danger of being destroyed by the ever increasing use.

This park is so close to the huge urban area of Silicon Valley, that swarms of climbers are trying their skills on the precious rock outcrops which provide such special habitat. And now climbers are moving into the interior of the park to find new rocks to climb. And making new trails through some of the most beautiful oak and madrone forest in the state. Such areas are fast disappearing in California, and to manage this park "for the continuing scenic, educational, scientific and recreational benefits of present and future generations" (New Declaration of Purpose) without referring to *preserving it in its near wilderness state*, is counter to all we presently understand about the value of such areas.

145

That is why I am opposed to any efforts to increase camping or ease access to the area. As it is now, there is overuse; why not spend the money on bringing in more Park Rangers to protect this precious place?

Please change your approach from one of "use" to one of "protection".

Sincerely,


Carol C. Jacobs

133 Mapache Drive
Portola Valley CA 94028

April 26, 1999

Robert Ueltzen, Northern Service Center
California Department of Parks and Recreation
1725 23rd Street
Sacramento CA 95816

Subject: Castle Rock State Park Plan

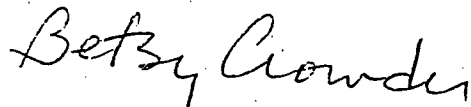
Dear Mr. Ueltzen:

On April 14 I gave to Jan Anderson, Superintendent of Santa Cruz Mountain Parks, a copy of my comments on the Preliminary General Plan for Castle Rock State Park. She made a presentation before the Board of Directors of the Midpeninsula Regional Open Space District, of which I am a member, describing the proposals in the Preliminary General Plan.

I am enclosing another copy of my comments for your office, as I understand the comment period has been extended to May 14th. I want to make it clear that these are my personal comments, not the comments of our Board of Directors.

It is a pleasure to work with Ms. Anderson and Ranger Miles Standish on parks that are close neighbors of Midpeninsula Regional Open Space District. Please send me notice of the hearing before the State Parks Commission, which I understand will be in August.

Yours sincerely,



Betsy Crowder

Enclosure

cc: MROSD Board of Directors

CASTLE ROCK STATE PARK PLAN

Maps and several places in text refer to MROSD's Saratoga Gap OSP; in many cases I believe it should refer to Long Ridge OSP as neighbor to the north. We also are a new neighbor to the east, with our purchase of the Girdner and Foster properties. Other CRSP neighbors are San Mateo County Parks (Pescadero and Memorial Parks).

p.9 Upper Stevens Creek--I don't think this park has redwoods, let alone mature ones. **146**

p. 10, 35 Concern by neighbors over adequate ranger staffing should read instead concern over inadequate ranger staffing; although it is stated that there are two full-time rangers, I believe that actually there is only one full-time ranger, and he is often only three-quarters time at CRSP. **147**

p. 27 Last commercial logging said to be 1970's; wasn't the park created in 1968? Did logging continue? **148**

p. 33 Skyline to the Sea Trail (S to S)--It would be nice to include some history of Tony Look and the Sempervirens Fund's efforts to acquire land and actually build this trail. It is a heartwarming story. The trail is very narrow in most of its length, and has steep drop-offs every so often, crossing the highway several times. It is suitable only for sturdy hikers, not for equestrians or bicycles. **149**

p. 36 Re climbing. We need to work together on plans. Lion Caves are very fragile, being damaged unfortunately by thoughtless climbers, and should not be re-opened to climbing (text says closed temporarily). Goat Rock is badly degraded and needs much restoration. **150**

p. 37 MROSD and Castle Rock have many common issues as stated on this page. Gun range noise pollution is an issue that needs to be addressed area-wide. **151**

pp. 40-41 California's Public Resources Code clearly addresses the proposed uses in the Plan, which to me seem appropriate.

p. 48 I feel this wording on Managing Visitor Impacts avoids the issue of mountain bike use, which is a contentious one for all park and open space agencies. Because our jurisdictions adjoin on two sides, I think CRSP needs to take a firm stand on whether or where to allow bicycles. This ought to be in the Plan, rather than up to the discretion of the superintendent. **152**

p. 65, 66 and 74 The Plan should "bite the bullet" regarding bicycles on trails and on the climbing plan. MROSD is ready to cooperate with its experience of the former, and to learn from your experience with the latter.

p. 74 Regarding the Visitor Center, long proposed by Sempervirens: MROSD is ready to cooperate with CRSP on this project.

p. 62 There seems to be a conflict here between promoting controlled burns and preventing fire danger to neighbors. These two issues should be better coordinated.

153

p. 139 Bicycle Use Policy in State Parks. MROSD is revising its trail guidelines, and would like to work with State Parks on a reasonable solution for all users. the S to S Trail is unsuitable, as is the Toll Road. We prefer wider trails.

154

General Questions:

1. If CRSP Plan for the campground at Partridge Farm is implemented, what additional staffing is proposed?

How late would the gate be open?

Would it be actual car-camping or walk-in?

Would it be seasonal or year-around?

Would pets be allowed? Monitoring of this?

How many campsites proposed?

Word has it that the existing campground is rarely full; how could more use be predicted?

155

2. Although "staff presence" is mentioned on page 70 for monitoring and enforcement, there is no estimate of the number of staff that would be needed. I am concerned that more facilities might be provided than ranger and maintenance staff to oversee them.

156

3. Leaving the bicycle policy up to the Superintendent leaves it too susceptible to change, should personnel change. Guidelines should be established for this park, as for the guidelines beginning on page 78.

157

Betsy Crowder
MROSD Director, Ward 6

Friends of Castle Rock State Park

Dedicated to the Preservation, Protection, and Restoration
of Castle Rock State Park

Bruce Bettencourt
18474 Grizzly Rock Rd
Los Gatos, Ca 95030

5-14-99

Dave Keck
Northern Service Center
1725 23rd St, Suite 200
Sacramento, Ca 95816

COMMENTS ON THE CASTLE ROCK GENERAL PLAN

After reading through the proposed Plan the basic problem of this Plan stems from the beginning premise as outlined in the Declaration of Purpose: *"The purpose of Castle Rock State Park...."* In other words, the California Department of Parks and Recreation has taken the stand that Castle Rock State Park should remain classified as a State Park and should therefore be managed as a future State Park. Therein lies the fatal flaw that pervades this whole plan. Many people have had the foresight to see that Castle Rock has a greater future than to remain as a State Park. The previous Declaration of Purpose alluded to this potential when it declares that Castle Rock State Park will be managed by the Department as a "near-wilderness". Castle Rock clearly has the potential to become a future wilderness and be linked up with other pieces of open space, park land and wilderness to provide a greater whole than the sum of the parts. This concept of managing towards the wilderness state is not new with the Department. There is precedent in the California State Park System: Sinkyone Wilderness State Park. Sinkyone, a State Park unit on the "Lost Coast" above Fort Bragg, is presently classified as a State Park, but, as the name clearly shows, the Department's intent is to return the unit back to Wilderness status. And therein lies the difference. The Department clearly does not want to attempt the same policy towards Castle Rock. The Department makes it clear in the Preferred Plan that it does not presently consider Castle Rock of wilderness quality, and, by implication, is declaring that it does not feel that Castle Rock is a good candidate to return to the wilderness state. Why the Department has taken this position is open to debate, but the current emphasis on revenue generation and a 16 year conservative management legacy leaves little to the imagination.

Regarding the actual plan, there are a number of points that need to be explored:

Spirit of Place (Pg. 3)

The Plan states: "Although substantially altered since the arrival of Euro-Americans, the recovering park lands provide a glimpse of the original primeval character of the Santa Cruz Mountains....Little evidence of human occupation is visible from the park. Why not just say that the park is recovering to the wilderness state?"

159

Wildlife Habitat and Special Habitat Features (Pg. 15)

"Caves, crevices and ledges associated with rock outcrops provide nesting and cover habitat for many wildlife species that are known to occur in the Castle Rock State Park vicinity." Is the preservation of these resources ever going to be compatible with the destructive nature of rock climbing?

160

Hydrology (Pg. 20, 21)

"One small group of springs, known collectively as Travertine Springs, are a rare form in Santa Cruz County in that they issue deposits of calcium carbonate where water surfaces." Why isn't this "rare form" mentioned anywhere later in the management of the Park?

161

"Small earthen dams and associated reservoirs (<0.2 acres each) are located on 2 tributaries to the San Lorenzo River." "These sediment loads appear to be large enough to deliver significant damage to downstream aquatic resources, should the unmaintained dams fail." Here is clearly a significant problem. How does the Plan propose to deal with it?

162

Existing Facilities (Pg.33)

"The park offers over 34 miles of hiking trails, ranging from short walks, to longer trails used by hikers, backpackers, and equestrians. Most use occurs on trails near the main parking lot....." Here is a clue: most use occurs on trails near the main parking lot. What is going to happen when the main parking lot is relocated to Partridge? Isn't "most of the use" (read here impact) going to be relocated to trails near the new parking lot? Most of the discussion in impacts implies that since Partridge is a highly disturbed area that impact won't be of much concern - a very narrow point of view. How are the immediate areas near the Partridge area (Lion caves, Goat Rock, the Black Oak forest, and the proposed Natural Preserve) going to be protected from the proposed concentrated visitation?

163

Zone of Primary Interest (Pg. 42)

"The Department's concern for any environmental changes or ongoing impact outside the unit that could jeopardize or degrade State Park System values are thought of as zone(s) of primary interest." Then the plan goes on to mention issues outside the boundary of the State Park - but only in a two dimensional way. No mention is made of air quality, noise from passing planes, threat of oil or mineral exploration or future tunnels.

164

Public Access, Development and Use of the Partridge Farm Area (Pg.44)

The plan states: "In considering development at Partridge Farm, there are three primary goals:

(1) to provide and manage recreational use in such a way as to minimize resource impacts. The best way to minimize impacts is to lessen the cause of the impact - in this case people. By limiting the number of people, and making it physically more challenging to reach the popular destinations, the impacts can initially be held to a much lower level. The Plan proposes 130 parking sites, plus 20 campsites. How will resource impacts be minimized when common sense says they will increase dramatically?

165

(2) to establish a primary contact location to orient visitors to recreational opportunities and educate them about resource values. It has been stated that the development of Partridge, to be implemented in three phases, will take, optimistically, several years. This will create, at least temporarily, and perhaps permanently, (if studies reveal that the area cannot handle the additional 50 cars) two separate primary visitor access points. How does the Plan meet the goal to establish a primary contact location... when common sense says just the opposite will likely result?

166

The suggestion has been made at a later point in the plan that a primary contact location be developed as a multi-agency information center at Saratoga Gap (Pg. 98). Such a facility would not only be more cost efficient, but would serve a much wider audience.

167

(3) to improve manageability of visitor parking."

Manageability of parking is always going to be a problem at Castle Rock due to the physical layout of the park along two major highways. Consolidating the parking near the present main parking lot into another lot at Partridge is a marginal solution at best. The best solution would be to manage the parking along all of the State Highways as a whole system from the onset rather than have two parking strategies: one of consolidation at Partridge and the rest spread out along the highways in various locations. A possible solution would be to have several smaller lots with metered parking (or some other form of revenue collection) at trail heads with strict designated parking so that the space would be limited. How does the creating additional parking at Partridge improve manageability of visitor parking?

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Access to Partridge is from SR35 on a blind curve (speed limit 55 mph). Left turns in or out of Partridge would have to be made against oncoming traffic. How does the Plan deal with this hazard to the safety of the park visitor, local residents, and other traffic?

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ALL THREE OF THESE GOALS CAN BEST BE MET WITHOUT UTILIZING THE PARTRIDGE FARM AREA.

Statewide Camping Interest and the Lack of overnight Accommodations (Pg. 47)

The plan states: ".....the Department considered the inclusion of limited overnight facilities for those who may travel a greater distance or want to experience the park's environment during the morning and evening hours." Why do all State Parks (and again maybe this is another reason why the designation of State Park should be reconsidered) have to have vehicular access camping? Why can't certain parks, by the nature of what they are, only offer camping that is not easily accessible by vehicle? There are two nearby State Parks, one Santa Clara County Park and a private park that provide vehicular access camping within a very short driving distance from Castle Rock. Castle Rock has always provided an uncrowded back packing experience that has had a charm that most state parks don't have. Revenue generation is driving the camping experience in undesirable directions and Castle Rock has been a holdout. Public opinion is widely against camping at Partridge. How is the proposed camping justified? How can wildlife be prevented from becoming habituated to human food?

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Managing Resources and Visitor Impacts (Pg.48)

The plan states: "..... prior to site specific development or preparation of management plans, the area of potential impact will be surveyed and reviewed by appropriate personnel and responsible agencies. Should conditions warrant, studies would be implemented to provide further assessment of conditions and monitoring would be initiated to compare changes." Why, then, is State Parks already preparing a climbing plan without the "survey and review by appropriate personnel and responsible agencies"? Who are the appropriate personnel? Who would decide when the "conditions warrant" the necessary studies to assess present conditions and who would carry out the necessary monitoring to access the changes? The plan also states: "When impacts threaten to exceed standards, actions will be considered to bring resource conditions within expected limits." Who is going to set the standards? More importantly, who is going to decide when the standards are exceeded and implement mitigation? And, most important, even if mitigation is deemed necessary, the plan only states that "actions" need only be "considered to bring resource conditions within expected limits." No action is mandatory. THIS IS ONE OF THE MOST EGREGIOUS FAILURES OF THE PLAN. HOW WILL THE PARK BE PROTECTED FROM THE POLITICAL EXPEDIENCIES OF PARK ADMINISTRATORS WHO FIND THE 'GUIDELINES' INCONVENIENT???

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Resource Values (Pg. 52)

The plan states: "The potential increase in visitation and future recreation demands will be met with management actions that minimize visitor impacts, with the intent to maintain wildland values and low-impact recreational use." But on page 46 the plan also states "...impacts from climbing and other forms of

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recreation, including soil compaction and erosion, moss removal from scraped rock faces, ground vegetation removal, rock face exfoliation, disturbance to wildlife, and bolting of rocks have resulted in a general decline in resource values. This increase in climbing activity in the park has resulted in congested activity areas and has caused users to pursue new climbs deeper into the interior of the park. Unauthorized trails and rock bolting are appearing in areas previously undisturbed." How can the plan speak about increasing use when it already states that the present use level is causing increasing degradation? Why isn't the plan speaking of decreasing use, or, at the very least, freezing it at the present level until studies have been completed and mitigation plans are in place?

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Declaration of Purpose (Pg.53)

This is the heart of the Preferred Plan's difficulty. The California Department of Parks and Recreation has taken the original vision and made it more like a standard state park. The original (not approved by the State Park Commission but approved by the Department's administration) purpose stated:

The purpose of Castle Rock State Park is to perpetuate for the people forever, for their inspiration, enlightenment, and enjoyment, a natural area of the Santa Cruz Mountains on the upper watershed of the San Lorenzo River which incorporates a particular combination of geology, topography and plant assemblages, including the unique caves and related erosional anomalies in Vaquero (sic) sandstone; a diversity of plant life ranging from specimen size oaks, madrone, California bay, Douglas fir and coastal redwood to luxuriant chaparral and grasslands; and numerous inspiring view sites.

To accomplish this purpose, the California State Park System is to manage the Park resources in such a way as to retain them in a near wilderness state for the continuing scenic, educational scientific and recreation benefit of the people and to interpret these resources in an effective manner. In all cases, facilities, where necessary for public health, safety and convenience, will be of the more simple and primitive type, provided in designated locations with the least disturbance to the scenic beauty and resource values of the overall area

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The proposed Declaration of Purpose has a much broader view allowing "....the California State Park System to manage the park resources for the continuing scenic, educational, scientific and recreational benefits of present and future generations." No restrictions are made to retain the resources in a "near wilderness state" or to restrict facilities to "....the more simple and primitive type..." Only within the proposed natural preserve does the proposed Declaration state: "Restoration, preservation and education of wildland resources and ecological processes will be primary considerations within the Natural Preserve." Why has State Parks clearly chosen to remove protective language from the Declaration of Purpose?

I would propose that the Declaration of Purpose be modified to more closely resemble the original declaration and clearly state that the purpose of the park is to return the area to a wilderness state. In other words, make the conscious decision to manage the park back to a wilderness condition, not just maintain the area in its present state. The plan's Unifying Interpretive Theme (Pg.76) states: *"Although substantially altered by a variety of human impacts, the recovering Castle Rock State Park provides a glimpse of the original primeval character of the Santa Cruz Mountains"* and the goal for vegetation management (pg.60) is to: *"Preserve and perpetuate examples of natural plant communities, and restore, protect, and maintain native ecosystems and indigenous flora and fauna."* Why not take this a step further and manage the park back to the "primeval character"? If that decision is made now, at some point in the future the goal can be realized. If that decision is not made now, the park will forever be just another state park with possible future development.

Cultural Resources. Scenic Preservation (Pg.68)

Does this goal include the Department's intention to remove or mitigate the radio towers on Mt. Bielawski? If so, that is a major decision and needs to be clearly stated.

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Petroglyphs have been found in the vicinity of Partridge Farm. How will this unique cultural resource be protected, even without the proposed development of Partridge? How will this unique cultural resource be protected, *with* the proposed development of Partridge?

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Unit wide Access and Trails (Pg. 74)

The plan states: *"The District Superintendent has the authority to open and close specific roads and trails to mountain bike use in the park based on Department policy and criteria established for determining environmental and social impacts."* This is another example of how the Declaration of Purpose has an impact on how the park is to be managed. If the purpose of the park was to state that the park would be returned to a wilderness state the presence of bicycles would not be an issue. Now the issue is being side-stepped since the plan allows the District Superintendent to make the decision without any guidance aside from the general guidelines for all State Parks. Allowing bikes into the park would be a major change in present policy and underscores the Department's commitment to downgrade the protection of the park. Once bicycles are permitted into the park the use will never be removed regardless of what the Department may say. The political pressures are too great. Why does the Plan sidestep such a fundamental issue?

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Interpretive Themes (Pg. 76 - 77)

No mention is made of the Magnetometer site along the upper San Lorenzo, its unique reason for being at that location or its connection to Russell Varian.

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Partridge Farm Area (Pg. 85-86)

The plan states: *"The primary concern in any future development and use of this area is the potential impact on the natural and cultural resources of this site and the adjacent areas."* *"Development of the Partridge Farm is expected to increase visitor use in the adjacent areas."* *"....different standards of acceptable change are likely."*

What is an "acceptable change"? What happens if the change is "not acceptable"? Who is to decide, and who is going to implement mitigation? Will facilities be removed?

The guidelines of this section are inconsistent. In the first guideline the plan states: *".....overnight use accommodations in the form of walk-in campsites may be developed for campers...."* The fifth guideline states *"Walk-in campsites and overnight parking (estimated at 20 campsites and 30 cars) should be developed."* One is permissive and the other is almost mandatory. Which is it?

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The plan states in the third guideline *".....an overall site plan should be prepared for Partridge Farm."* Does this mean that development can, or cannot, occur without such a plan?

Similarly, in the second guideline, the plan states: *"Establishment of day use parking, walk-in campsites, and other facilities at Partridge Farm should include an assessment of the ecological and social conditions for the adjacent areas of the Black Oak Woodland, Lion Caves and Castle Rock Ridge management Zones."* Is the assessment optional? Does this mean that development can, or cannot, occur without such a plan?

Parking and Access (Pg.90-93)

The plan states: *"This general plan proposes to relocate the existing main parking to the Partridge Farm area, in part or in full, but would not increase day-use parking capacity or overall visitor attendance due to parking."* This statement is misleading because while it implies that impact from parking will be the same, it fails to emphasize the fact that the location of the impact will be a major change and that the new proposed location is immediately adjacent to sensitive areas. Once again, the second guideline makes specific site investigations appear to be optional: *"The Department should perform specific site investigations and resource assessments to determine appropriate management actions and recommended mitigation."* ? Does this mean that development can, or cannot, occur without such a plan?

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The Goal for Roadside Highway Parking states: *"Consolidate parking for appropriate access and effectiveness."* In other words, concentrate use - in a more sensitive area. That sounds like a prescription for environmental degradation rather than preservation. How is the plan to *"Consolidate parking for appropriate access and effectiveness."* going to further address *"The primary concern in any future development and use of this area (Partridge) is*

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the potential impact on the natural and cultural resources of this site and the adjacent areas."

The idea of eliminating much of the roadside parking as proposed in the first and second guideline and the improvement of limited parking at strategic trail heads is a good idea. What would happen to the emergency helicopter pad if Partridge is developed?

Overnight Use Facilities (Pg. 93)

The Goal states: *"Expand access opportunities for visitors who may travel a greater distance or want to experience the park's environment during the morning and evening hours."* This guideline already appears to be fulfilled. There are two campgrounds in the park that people can stay overnight. The proposed plan is not proposing to change the facilities, so why state that something is being proposed that is already available? Regarding the statement "traveling a greater distance" means nothing. Many people have stayed at the present campgrounds that have come from foreign countries. The only difference that putting a walk-in campground will make is to provide a camping facility for people that don't want to hike to the campground. In other words, it will provide a camping facility for a different kind of user group than what Castle Rock has traditionally met. Traditionally, if people want to experience a wildland (or wilderness) they are required to use their feet and enjoy the experience in the least intrusive way possible. By placing a walk-in camping experience (read here a drive-in camping experience because in State Parks walk-in campsites are rarely more than 100 yards from the vehicular parking) you drastically change the character of the park to include more "typical" park visitors that want to have their park experience as close to their vehicle as possible. What evidence is there that the public wants this camping development?

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Trail Camps (Pg.94)

The plan states: *"The primitive nature of the Castle Rock Trail Camp and overall visitor camping experience is being impacted by the presence of park vehicles, old structure, and operational facilities....."* Then the guidelines go on to make some specific suggestions, but they make no mention on how to mitigate "...the presence of park vehicles..." What are the recommended solutions to these problems?

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Park Administration (Pg. 97)

The plan states: *"If the Cal Trans property at Saratoga Gap (former maintenance facility) became available in the future, it could serve for State Park administrative and maintenance functions."* It further states: *"Vehicle access to this site is shared with private residences in the Indian Rock Ranch Subdivision, therefore, this area would not work well for public use facilities."* Why couldn't an access be developed off State Highway 9? Why couldn't a park headquarters and visitor center be developed on the northwest corner of

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Saratoga Gap? The plan talks of a multi agency visitor center, but there is no reason not to make it State Parks as well. I'm sure that if State Parks pays for the facility the other agencies wouldn't mind sharing the facility. Saratoga Gap appears to be the logical location to locate a park headquarters and visitor center - it is the gateway to the Santa Cruz Mountains. State Parks (with the acquisition of the old Cal Trans yard) will own two of the four corners of the junction of State Highways 9 and 35. Why hide the park headquarters two miles away at Partridge Farm, when the obvious need is at Saratoga Gap? Isn't this a "no-brainer" decision?

Environmental Analysis - Summary (Pg. 101 - 102)

The summary on page 101 talks about issues raised during the public meetings and the "*....desire for recreational opportunities (particularly rock climbing and mountain biking), and conflict of uses (particularly with mountain biking).*" The plan further states: "*This general plan sets the broader goals for the unit's management.....*" "*It does not define the specific details.....*" "*Those details are part of future planning steps that may include layout and design of facilities or specific resource management plans and process. Another level of environmental analysis is applied at the time.*" Except for the issue of mountain biking - one of the most contentious issues. This plan proposes that the District Superintendent (Pg. 74) make that decision on his own authority without any environmental analysis. Why is this decision being made outside the general plan process? Why is the general plan even allowing the use of mountain bikes given the history of the park?

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Esthetics (Pg. 103)

The plan states: "*The two predominant esthetics factors at Castle Rock State Park are visual and audible.*" "*Visual qualities of the Castle Rock State Park are generally rated high with only specific points having negative values.....*" "*Middle-ground and background views usually appear unimpacted by human beings.*" What this analysis fails to mention is the growing visual impact of the radio towers on Mt. Bielawski. Why couldn't the State buy this property and consolidate all of the towers to a location that wasn't as visually offensive?

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Significant Environmental Effects of the Proposed Project (Pg. 107)

In section #1 the plan states: "*There is a potential for significant traffic impacts. The entrance to partridge Farm may require a new alignment and channelization to provide safe access and egress when it is developed for public use.*" There has already been one pedestrian fatality at the entrance to Partridge and if this area becomes the park's operational center there is not only going to be more pedestrian activity at this location on State Highway 35, there is going to be a need for a trail crossing to access the Skyline Trail with more pedestrian traffic using State Highway 35 to access Castle Rock. These issues should be addressed in this section. How will the Plan address pedestrians traffic?

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Although the environmental effects section addresses vehicular traffic, visual impacts, special plant and animal species, rare natural communities and cultural resources no mention is made of impacts on soil or geologic resources including tafoni. Tafoni is truly one of the unique natural wonders at Castle Rock State Park. And under the rare natural plant communities portion there appears to be no mention of the Black Oak forest and Lion Caves area. How does the Plan propose to protect the tafoni, the Black Oak forest, and Lion Caves?

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On page 111 the plan states: *"There is the potential for significant adverse environmental impacts resulting from increased public use and the development of facilities. These impacts, however, can be mitigated to a level of non-significance with proper design and siting of facilities, resource management programs, and specific mitigation measures."* There appears to be no mention of any feed back system of how damage is to be assessed and how much damage is to be allowed before mitigation measures are put into effect and who is going to make those decisions. *"The impacts associated with climbing (i.e. soil erosion and compaction, vegetation loss around climbing pitches, removal of moss from rock surfaces, development of "volunteer" trails, rock face exfoliation, disturbance of wildlife) may continue in those areas outside of the natural preserve (if classified)."* How about outside the preserve? Are we just going to give up on any area outside the preserve? Who will make these decisions? On what basis? Is the State Park Service prepared to bear the cost of mitigation to the "level of non-significance"?

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Alternatives (Pg. 113 - 118)

The proposed alternatives to the Preferred Plan appear to be straw dogs. That is, something is proposed to just show that proposals are possible, but not as good as the "preferred plan." A combination of the Preservation Priority and the Wilderness Classification would probably make for interesting alternative if correctly put together and presented. One possible proposal would be to classify the unit as a State Park but include wilderness in the name and have the Declaration of Purpose make it obvious that the park would be managed towards a future wilderness. Keep the proposed preserve in the center of the park until solutions could be found for relocation of the power lines. Unsafe parking that is now on State Highway 35 could be relocated to the large flat area off of State Highway 35 at milepost 10.9. The new parking area would need some minor grading (and the blessing of Cal Trans) but there is immediate access to the Skyline Trail on the east side of the road and a potential future trail to Castle Rock on the west side. The Park's headquarters could be located at Saratoga Gap on the northwest corner on property already owned by State Parks, and if the Cal Trans yard is acquired, that could be developed into a two story parking lot with a roof access off State Highway 9 (avoiding the problem of sharing the road into the Indian Trail subdivision). Partridge could remain as an area that could be used on a special use basis by such groups as amateur astronomers and weddings with the intent of restoring

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the old Christmas Tree Farm back to the native vegetation. Portions could be preserved to show what was once the historic use and the present helipad could be maintained to have an emergency location to evacuate injuries from rock climbing accidents. Parking on State Highway 9 would be limited to designated parking at specific locations and parking on Skyline Blvd. could be limited to designated parking lots. Restricted parking would make for restricted use. Revenue could be generated by requiring either special parking permits only available for a fee at the headquarters or local (meters, machines, etc.) collection points.

Included here is an Alternative Preferred Plan, using most of the same language, and following the format, of the Alternative Plans found in the CEQA Draft.

AN ALTERNATIVE PREFERRED PLAN FOR CASTLE ROCK SP

DESCRIPTION

State Parks will recommend that all undeveloped areas of the Castle Rock State Park will be classified by the California State Parks Commission as a State Wilderness. A buffer zone for designated parking areas could be excluded from the wilderness classification. Restoration, preservation, and education of wildland resources and ecological processes will be primary considerations within the park. The park administration function would remain at the hike-in campground, or be relocated to Tin Can Ranch or the Caltrans maintenance yard if surplus. No public use facilities would be constructed at Partridge Farm or the Caltrans site. No new trails would be constructed unless determined to be necessary. Volunteer trails would be removed and either scarified, revegetated, or allowed to return to a natural state unassisted. The 1800 acres proposed for classification as a Natural Preserve could be expanded to the west to include an additional 400 acres bounded by the Saratoga Toll Road, the southern boundary of the Indian Rock subdivision, Saratoga Gap Trail, and the San Lorenzo River. This would include all the redwood wildlife habitat within the proposed natural preserve as well as riverine and riparian habitat necessary for aquatic species such as steelhead trout and California red legged frog. Mountain biking would continue to not be permitted. Following preparation of resource management plans, habitat restoration projects would be carried out to enhance the natural resource qualities.

Parking would be reduced at the existing parking lot to decrease public access and use of the already heavily-used Castle Rock Ridge area. Roadside parking could be improved but not increased elsewhere, to encourage dispersed use of the park. Five areas along highway 9 have potential for parking improvements: Waterman Gap, Red Mountain, Oil Creek, Beekhis Road, and Hoe Gate. All of these parking areas are existing; while improvements could be achieved, it is not likely that any significant increase in capacity can be made. Most of these parking areas are highway turnouts or pulloffs. Some roadside parking would be

eliminated to reduce the number of trail users and related impacts on adjacent resources. A parking survey was performed to determine the number of parking sites available for users of the park. A total of 288 parking spaces were found along Highway 9 between Saratoga Gap and Waterman Gap. Improved public use facilities previously planned at Sempervirens Point will reduce parking from 30 to 21 vehicles and one bus. A total of 96 sites were found along Highway 35 between Saratoga Gap and Indian Rock. The existing Castle Rock parking lot has 55 parking sites. Parking outside of the Castle Rock main lot, plus parking at Indian Rock, a total of about 50 sites, could be removed. An area on the east side of SR35 near Mt Bielawaski could provide 50 parking sites, only after the goals of the Castle Rock Ridge resource management zone objectives have been realized.

Actual documented parking data, which are 80% to 90% below the theoretical maximum, will be used to evaluate plans.

EVALUATION

If Castle Rock State Park does not now qualify for a Wilderness classification, the Plan will provide a detailed analysis that identifies under what circumstances the park will qualify for classification as Wilderness under the California Wilderness Act. The Plan will recommend proper action necessary to attain the goal of wilderness classification. The name of the park may be changed to Castle Rock Wilderness State Park in anticipation of a wilderness designation, which is especially appropriate as the possible acquisition of the Waterman Gap property is anticipated.

Soil erosion and vegetation loss around high use climbing areas and from volunteer trails would be reduced with the implementation of an adequate climbing management plan. Sensitive areas around Partridge Farm would be preserved. Maximum recreational use would be limited by parking. Recreational use patterns may change; use may become more evenly distributed throughout the week and seasons, and dispersed around the park. Recreational demands will continue to increase with the population growth in the nearby urban areas. Although it is not expected that the state park must accommodate demand created by population growth, there will be increased use of the unit. Other open space areas in the region may need to increase access to meet the growth demand. The expansion of the proposed Natural Preserve would include the powerline running west of the San Lorenzo River. Maintenance activities for the powerline would be incompatible with the natural preserve classification. PG&E will be encouraged to relocate the powerlines. Multiple entry points into the unit will be reduced to mitigate management and operational difficulties.

1. A dispersed visitation would require an appropriately dispersed interpretation to educate the visitor to the sensitive resources, the need for protection, and recognition of entering a state park.

2. Potential control of illegal activities could be enhanced.
3. Emergency response time will be reduced.
4. Maintenance costs would be reduced.
5. The demand for water and sanitation facilities at parking areas would be unsatisfied.

Closing some of the multiple entries may disperse users over a smaller area and would substantially increase the opportunity for park staff to contact and monitor visitor activities. Rotating closures could allow areas to recuperate from intensive use, if necessary.

Sincerely,

A handwritten signature in black ink, appearing to read "Bwa BLS" with a long horizontal stroke extending to the right.

Bruce Bettencourt
Friends of Castle Rock State Park



California Wilderness Coalition

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San Fernando Valley Audubon Society
Save Our Ancient Forest Ecology
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South Fork Mountain Defense
South Fork Watershed Association
South Yuba River Citizen League
Tulare County Audubon Society
Tule River Conservancy
U.C. Davis Environmental Law Society
Ventana Wildlands Group
Westem States Endurance Run
The Wilderness Society
Wintu Audubon Society

May 14, 1999

Robert Ueltzen
Northern Service Center
Department of Parks and Recreation
1725 23rd St., Suite 200
Sacramento, CA 95816

Re: CEQA comments for the Preliminary General Plan (PGP) for Castle Rock State Park (CRSP)

Dear Mr. Ueltzen,

The California Wilderness Coalition (CWC) consists of over eighty organizations dedicated to the preservation of California's wildlands. Our individual members are frequent visitors to parks and open space areas throughout the state, and they are concerned with the protection of wilderness not only for its recreation value, but also for its own sake. I write you on behalf of CWC regarding the Preliminary General Plan for Castle Rock State Park. This letter supplements our previous CEQA comment letters and meetings with DPR officials.

CWC and many others have raised specific issues with the PGP regarding its failure to give adequate protection to the extremely important and sensitive wildland resources provided by Castle Rock State Park. CWC is very concerned with the irreversible impacts created by the Partridge Farm development proposal. The general plan lacks an ecological analysis of the impacts to the Black Oak forest, and there been no environmental survey data collected in any section of the park. Moreover, the level of use for Partridge Farm will create a significant, unavoidable impact. While CWC is sympathetic to the need for managing human use of the park, the PGP did not identify a full range of reasonable alternatives to meet this goal.

There has been tremendous public support for wilderness designation of CRSP. Despite the public call for more wilderness areas, the PGP does not provide an adequate analysis of the arguments in favor of wilderness designation. Viewed within the context of the Santa Cruz Mountains, Santa Clara (Silicon) Valley, and San Francisco peninsula, CRSP is a critical core reserve of wilderness from which to build on. Future generations of California citizens will hail wilderness designation of the park.

Although there are many other places within this region to engage in the full spectrum of outdoor education. However, there are very few wilderness experiences. DPR should conduct a regional recreational opportunity analysis before proceeding with any general plans in the region. It is not appropriate to analyze each park in isolation. DPR should conduct a regional recreation opportunity analysis. DPR has a responsibility to maintain the wilderness experience at CRSP because it is one of the only park units in the entire region that provides such an experience. The best way to ensure this protection is wilderness designation.

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Please respond to the following points:

CRSP qualifies for wilderness because it meets all the requirements listed in the California Wilderness Act because:

1. CRSP has been substantially restored to a near natural appearance and the imprint of man's work is substantially unnoticeable. (PRC Sec. 5093.33(c)) DPR's own staff and documents have described the nearly-restored pristine qualities of CRSP.
2. CRSP is of sufficient size to make practicable its preservation and use in an unimpaired condition. Although the park itself is not yet 5,000 acres, the adjacent Waterman Gap property owned by the San Lorenzo Valley Water District may soon be acquired by the state. Viewed in the context of the bioregion, 3600 acres of land is quite sufficient for wilderness designation.

CWC has endorsed a position paper with numerous other organizations calling for the designation of CRSP as wilderness.

CWC wishes to reiterate all points raised by the Santa Cruz Chapter of the California Native Plant Society about violations of CEQA, state code, and RMD's. Please respond to those concerns and adjust the General Plan to reflect solutions to these concerns.

Thank you for considering these comments. Please keep us informed as the General Plan process continues.

Sincerely,



Rich Hunter
Conservation Associate



PETE WILSON
GOVERNOR

State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO 95814



PAUL F MINER
ACTING DIRECTOR

DATE: December 24, 1997
TO: Reviewing Agencies
RE: CASTLE ROCK STATE PARK GENERAL PLAN
SCH# 97121108

Attached for your comment is the Notice of Preparation for the CASTLE ROCK STATE PARK GENERAL PLAN draft Environmental Impact Report (EIR).

Responsible agencies must transmit their concerns and comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of this notice. We encourage commenting agencies to respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

ROBERT UELTZEN
DEPT. OF PARKS AND RECREATION
1725 23RD STREET, SUITE 200
SACRAMENTO, CA 95816

with a copy to the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the review process, call at (916) 445-0613.

Sincerely,

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Attachments

cc: Lead Agency

○ = sent by lead agency
 X = sent by SCH

Resources Agency	Fish and Game - Regional Offices	Department of Transportation District Contacts	Business, Transportation, & Housing	Regional Water Quality Control Board
<input checked="" type="checkbox"/> Nadell Gayou Resources Agency 1020 Ninth Street, Third Floor Sacramento, CA 95814 916/227-1722 Fax 916/227-1648	<input checked="" type="checkbox"/> Richard L. Elliott, Regional Manager Department of Fish and Game 601 Locust Redding, CA 96001 916/225-2363 Fax 916/225-2381	<input checked="" type="checkbox"/> Linda Evans Caltrans, District 1 1656 Union Street Fureka, CA 95501 707/445-6412 Fax 707/445-5869	<input checked="" type="checkbox"/> Sandy Hensard Caltrans - Division of Aeronautics P.O. Box 942874 Sacramento, CA 94274-0001 916/654-5314 Fax 916/227-9693	<input type="checkbox"/> NORTH COAST REGION (1) 5550 Skyline Blvd., Suite A Santa Rosa, CA 95403 707/576-2220 Fax 707/523-0137
<input type="checkbox"/> Nicole Letrla Dept. of Boating & Waterways 1629 S Street Sacramento, CA 95814 916/445-6281 916/227-7250	<input checked="" type="checkbox"/> Ryan Brodtrick, Regional Manager Department of Fish & Game 1701 Nimbus Road, Suite A Rancho Cordova, CA 95670 916/358-2900 Fax 916/758-2912	<input type="checkbox"/> Local Development Review P.O. Box 496073 Redding, CA 96049-6073 916/225-3133 Fax 916/225-3145	<input checked="" type="checkbox"/> Alice Huffaker California Highway Patrol Office of Special Projects Planning and Analysis Division 2555 1st Ave. Sacramento, CA 95818 916/657-7222 Fax 916/452-3151	<input checked="" type="checkbox"/> SAN FRANCISCO BAY REGION 2101 Webster, Suite 500 Oakland, CA 94612 510/286-1255 Fax 510/286-1311
<input type="checkbox"/> Elizabeth A. Fuchs California Coastal Commission 43 Fremont Street, Suite 1970 San Francisco, CA 94105-2219 415/904-5200 Fax 415/904-5400	<input type="checkbox"/> Brian Hunter, Regional Manager Department of Fish and Game P.O. Box 47 Yountville, CA 94599 707/944-5318 Fax 707/944-5563	<input type="checkbox"/> Jeff Pulverman Caltrans, District 3 703 B Street Marysville, CA 95901 916/227-3859 Fax 916/223-7669	<input type="checkbox"/> Ron Helgeson Caltrans - Planning P.O. Box 942874 Sacramento, CA 94274-0001 916/653-9966 Fax 916/653-0001	<input type="checkbox"/> CENTRAL COAST REGION (2) 81 Higuera Street, Suite 200 San Luis Obispo, CA 93401-5422 805/549-3147 Fax 805/543-0357
<input checked="" type="checkbox"/> Reed Holderman State Coastal Conservancy 1330 Broadway, Suite 100 Oakland, CA 94612 510/286-1015 Fax 510/286-0470	<input checked="" type="checkbox"/> George Nokes, Regional Manager Department of Fish and Game 1234 East Shaw Avenue Fresno, CA 93710 209/445-6152 Fax 209/445-6607	<input checked="" type="checkbox"/> Phillip Badaj Caltrans, District 4 P.O. Box 23660 Oakland, CA 94623-0660 510/286-5578 Fax 510/286-5513	<input type="checkbox"/> State and Consumer Services Robert Stepp Dept. of General Services 400 R Street, Suite 5100 Sacramento, CA 95814 916/224-0214 Fax 916/222-3987	<input type="checkbox"/> LOS ANGELES REGION (4) 101 Centre Plaza Drive Monterey Park, CA 91754-2156 213/266-7556 Fax 213/266-7600
<input checked="" type="checkbox"/> Karen Yowell Dept. of Conservation 801 K Street, MS-24-02 Sacramento, CA 95814 916/445-8733 Fax 916/224-0948	<input type="checkbox"/> Department of Fish and Game Environmental Services 330 Golden Shore, Suite 50 Long Beach, CA 90802 310/590-5132 Fax 310/590-5192	<input type="checkbox"/> Lawrence Newland Caltrans, District 5 50 Higuera Street Oakland, CA 94612 805/549-3683 Fax 805/549-3077	<input type="checkbox"/> Fresno Branch Office 3614 East Ashlan Avenue Fresno, CA 93726 209/445-5116 Fax 209/445-5511	<input type="checkbox"/> CENTRAL VALLEY REGION (3) 3443 Roubert Road, Suite A Sacramento, CA 95827-3098 916/225-3000 Fax 916/225-3015
<input checked="" type="checkbox"/> Allen Robertson Dept. of Forestry & Fire Protection 1416 Ninth Street, Room 15116-24 Sacramento, CA 95814 916/657-0900 Fax 916/653-8957	<input type="checkbox"/> California Energy Commission 1516 Ninth Street, MS-15 Sacramento, CA 95814 916/654-3944	<input type="checkbox"/> Marc Birnbaum Caltrans, District 6 P.O. Box 12516 Fresno, CA 93778-2616 209/448-4088 Fax 209/468-4101	<input type="checkbox"/> Redding Branch Office 415 Knobloch Drive Redding, CA 96002 916/224-4845 Fax 916/224-4871	<input type="checkbox"/> LAHONTAN REGION (6) 2501 Lake Tahoe Boulevard South Lake Tahoe, CA 96150 916/542-5400 Fax 916/544-2271
<input checked="" type="checkbox"/> Hans Krentzberg Office of Historic Preservation P.O. Box 942896 Sacramento, CA 94296-0001 916/653-9107 Fax 916/653-9824	<input checked="" type="checkbox"/> Native American Heritage Comm. 915 Capitol Mall, Room 364 Sacramento, CA 95814 916/653-4082 Fax 916/657-5390	<input type="checkbox"/> Stephen J. Buswell Caltrans, District 7 120 South Spring Street Los Angeles, CA 90012 213/897-4429 Fax 213/897-4358	<input type="checkbox"/> Victorville Branch Office 15428 Civic Drive, Suite 200 Victorville, CA 92392-2359 619/241-6593 Fax 619/241-7232	<input type="checkbox"/> COLORADO RIVER BASIN REGION (7) 73720 Fred Waring Drive, #100 Palm Desert, CA 92260-2564 619/346-7491 Fax 619/341-6920
<input type="checkbox"/> Environmental Review Dept. of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001 916/653-0538	<input type="checkbox"/> Martha Sullivan Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102 415/703-2211 Fax 415/703-1965	<input type="checkbox"/> Harvey Sawyer Caltrans, District 8 P.O. Box 231 San Bernardino, CA 92402 909/383-4808 Fax 909/383-7934	<input type="checkbox"/> Santa Ana Region (8) 3737 Main Street, Suite 500 Riverside, CA 92501-3319 714/782-4130 Fax 909/781-6338	<input type="checkbox"/> SAN DIEGO REGION (9) 9771 Claremont Mesa Blvd., Suite B San Diego, CA 92124-1331 619/467-3952 Fax 619/571-6972
<input type="checkbox"/> Steve McAdam S.F. Bay Conservation & Dev't. Comm. 30 Van Ness Avenue, Room 2011 San Francisco, CA 94102 415/557-3686 Fax 415/557-3767	<input checked="" type="checkbox"/> Betty Silva State Lands Commission 100 Howe Avenue, Suite 100-S Sacramento, CA 95826 916/574-1872 Fax 916/574-1885	<input type="checkbox"/> Robert Rutkinke Caltrans, District 9 500 South Main Street Bishop, CA 93514 619/872-0689 Fax 619/872-0678	<input type="checkbox"/> San Diego Region (9) 9771 Claremont Mesa Blvd., Suite B San Diego, CA 92124-1331 619/467-3952 Fax 619/571-6972	<input type="checkbox"/> OTHER: _____
<input checked="" type="checkbox"/> Nadell Gayou Department of Water Resources 1020 Ninth Street, Third Floor Sacramento, CA 95814 916/227-1722 Fax 916/227-1648	<input type="checkbox"/> Gerald R. Zimmerman Colorado River Board 770 Fairmont Avenue, Suite 100 Glendale, CA 91203-1035 818/543-4676 Fax 818/543-543-4685	<input type="checkbox"/> Dennis Cowell Caltrans, District 10 P.O. Box 2048 Stockton, CA 95201 209/948-7906 Fax 209/948-7906	<input type="checkbox"/> Santa Ana Region (8) 3737 Main Street, Suite 500 Riverside, CA 92501-3319 714/782-4130 Fax 909/781-6338	<input type="checkbox"/> OTHER: _____
<input type="checkbox"/> Health & Welfare	<input type="checkbox"/> Thomas Ottoman Office of Emergency Services P.O. Box 29998 San Francisco, CA 94129 415/666-9300	<input type="checkbox"/> Leo Salazar Caltrans, District 11 P.O. Box 85406, MS S-5 San Diego, CA 92186-5406 619/688-6002 Fax 619/688-2511	<input type="checkbox"/> San Diego Region (9) 9771 Claremont Mesa Blvd., Suite B San Diego, CA 92124-1331 619/467-3952 Fax 619/571-6972	<input type="checkbox"/> OTHER: _____
<input type="checkbox"/> Kim Dinh Dept. of Health 601 N. 7th Street, PO Box 942732 Sacramento, CA 94234-2732 916/223-6111 Fax 916/227-6092	<input type="checkbox"/> Debby Eddy Delta Protection Commission P.O. Box 510 Wainwright, CA 95690 916/226-2290 FAX 707-226-2292	<input type="checkbox"/> Allen Kennedy Caltrans, District 12 2501 Pullman St. Santa Ana, CA 92795 714/723-2239 Fax 714/723-2292	<input type="checkbox"/> San Diego Region (9) 9771 Claremont Mesa Blvd., Suite B San Diego, CA 92124-1331 619/467-3952 Fax 619/571-6972	<input type="checkbox"/> OTHER: _____

NOTICE OF PREPARATION

CASTLE ROCK STATE PARK
GENERAL PLAN
DRAFT ENVIRONMENTAL IMPACT REPORT

The California Department of Parks and Recreation is preparing a Draft EIR for the General Plan for Castle Rock State Park. The Department of Parks and Recreation is the lead agency pursuant to the California Environmental Quality Act and, pursuant to Section 15082 (CCR) of the State CEQA Guidelines, has prepared this Notice of Preparation. Your agency's comments are requested in connection with the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. The project description, and location are included.

Your response must be sent to the address below not later than thirty (30) days after the receipt of this notice. We would appreciate the name of a contact person in your agency. If you have any questions, please call Robert Ueltzen at (916) 323-0975.

Robert Ueltzen
Northern Service Center
Department of Parks and Recreation
1725 23rd Street, Suite 200
Sacramento, CA 95816

PROJECT DESCRIPTION

The General Plan will outline the proposed facilities, land use, resource policies and management, operation, interpretation, and concession directions for Castle Rock State Park in Santa Cruz and Santa Clara counties.

The proposed plan calls for the establishment of a 2000 acre Natural preserve in the interior of the park to preserve and protect the natural resources and allow the natural restoration to continue. Partridge Farm area would be opened to the public; day use parking, and hike-in campsites would be developed. The Castle Rock Ridge area would continue in its current use; climbing in the unit would be limited to this area and a climbing management plan will be prepared. A multi-agency visitor center concept is proposed at the intersection Highway 9 and 35 (Saratoga Gap); although, an exact location and facility requirements would be developed later. The attached Proposed Land Use and Facilities map provides additional proposals.

IMPACTS

AIR QUALITY

There would be short-term, localized, minor disturbances on air quality resulting from the dust particles and exhaust fumes during the construction, removal, relocation, or improvement of roads, trails, buildings, and other facilities, and during watershed restoration activities under all the alternatives. The effects on air quality would be localized and temporary and would not exceed state or federal air quality standards.

Prescribed fires would result in impaired visibility and minor adverse effects of air quality. Vehicles driving on unpaved roads would continue to raise dust during the dry season.

GEOLOGIC

Severe ground shaking, landslides, and tsunamis from a large earthquake could cause widespread regional damage including cutting off of lifelines

such as roads, communication lines, electrical utilities, fuel pipelines, and water supplies; collapsing structures and trees; flooding of coastal areas, and loss of life. The inherent seismic risk in California cannot be reduced. The potential hazard can be reduced through careful siting of facilities and appropriate design.

THREATENED AND ENDANGERED SPECIES

Tiger salamander and marbled murrelet habitat may be impacted by watershed restoration, vegetation management, park operations, recreational use, and development of facilities. Golden eagle and peregrine falcon forage habitat may be impacted by watershed management and vegetation management. Black oak woodland, a DFG Habitat of Special Interest, may be impacted by visitor use and facility development.

ACCESS AND CIRCULATION

New development could attract additional park visitors and traffic levels would increase around these proposed development. Visitors using highways for travel within the park would increase traffic levels on those highways.

SOILS

Any increase in visitor use, particularly around the already heavily used Castle Rock Ridge area, could accelerate soil erosion. Steep slopes, and soil limitations, restrict development locations within the unit.

Park Trails & Regional Land Use

- The general plan supports regional trail objectives and encourages appropriate connections between Castle Rock State Park and adjacent county parks and Midpeninsula Regional Open Space Preserves.
- The general plan calls for a Unit Trails Plan, to determine specific trail routes and appropriate uses.
- Unit trail objectives include: loop-trails at the park's perimeter, interpretive trails into the natural preserve, improved trail connections between Saratoga Toll Road and Saratoga Gap Trails, and rehabilitation, or realignment to reduce resource impacts.

Roadside Parking

- Maintain roadside parking along Highway 9, for trail access between Saratoga Gap and Waterman Gap.

Sempervirens Point

- Improve vista point parking (25 cars) and provide restroom and site interpretive panels.

Tin Can Ranch

- Utilize existing site and facilities for environmental living program
- Maintain employee residence
- Potential trailhead parking

Trail Camps

- Castle Rock Trail Camp (15-20 sites)
- Waterman Gap trail camp (6 sites)
- Potential trail camp off Saratoga Toll Road near Beckhuus Road Trail.
- Potential trail camp at Craig Springs

San Lorenzo Valley Water District

- Shared interests in watershed management policies and protection of significant natural and cultural resources.
- Land use agreements to provide public access and recreational use.

Saratoga Gap

- Multi-agency Visitor Center (Info. & Interpretation)
 - Park Headquarters office (Caltrans property)
 - Park Maintenance Facility (Caltrans property)
- Proposals for the Gap will require acquisition of Caltrans property, site & building evaluations, agency coordination, environmental impact analysis, and public review.

Skyline Ridge

- Improve trails to meet regional trail objectives
 - Interpret cultural & natural features in Loggity Woods
 - Resource protection and control of exotic plants
- Management objectives are focused on multiple use and connections with Midpen and Santa Clara County trails. Visitor parking and trail signing are primary concerns.

Partridge Farm

- Visitor contact, orientation, and interpretation
 - Day use parking (50 cars initially, with adjustments)
 - Picnic tables, restrooms, water
 - Walk-in campsites (20 sites, 20 car parking)
 - Outdoor visitor programs & scenic overlook
 - Native plant restoration of open space
 - Adaptive use of farm house (residence, museum, administrative office, etc.)
- A plan will be prepared for the specific site prior to development of facilities and camp sites. Limits of acceptable change will be set through resource management and monitoring programs for Lion Caves and Castle Rock Ridge areas.

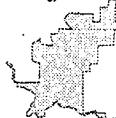
Castle Rock Ridge

- Opportunities for low impact rock climbing
- Prepare & implement climbing management plan
- Improve access trails and signing
- Enhance interpretation at Castle Rock Falls and scenic overlook
- Resource management plans & geologic studies


Proposed Natural Preserve

- A natural area of 2,000 acres is proposed for subclassification as a Natural Preserve. This will establish protection for sensitive plant communities, wildlife habitats and geologic features, and provide for the occurrences of natural processes.
- Recreational activity will be limited to trails and interpretive facilities required for the visitor's visual and sensory enjoyment of the resources.


MAP KEY



STATE PARK LANDS




PROPOSED NATURAL PRESERVE




CASTLE ROCK RIDGE (Climbing Area)


LEGEND




PARK BOUNDARY




PRIMARY HIGHWAY




PAVED ROAD




UNPAVED ROAD




TRAILS



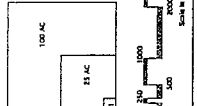
INTERMITTENT STREAMS



PERENNIAL STREAMS



EXISTING BUILDINGS



SCALE IN FEET

LAND USE & FACILITIES

Map No. 5

CASTLE ROCK STATE PARK
GENERAL PLAN

Proposed Land Use and Facilities

December 30, 1997

DEPARTMENT OF PARKS AND RECREATION

STATE PARK AND RECREATION COMMISSION

P.O. BOX 942896, SACRAMENTO, CA 94296-0001



**NOTICE OF HEARING ON MARCH 8, 2000
CALIFORNIA STATE PARK AND RECREATION COMMISSION**

NOTICE IS HEREBY GIVEN that the State Park and Recreation Commission, pursuant to authority contained in Sections 539, 5002.3, 5019.50, 5080.03, 5080.20, et al of the Public Resources Code, Section 11370 et seq. of the Government Code and pursuant to law, will meet on Wednesday, March 8, 2000 at 9:00 a.m. at the Santa Clara County Government Center; Isaac Newton Senter Auditorium, 70 West Hedding Street, San Jose, CA. The meeting facility is wheelchair accessible. Agenda items will include action on the Castle Rock State Park General Plan and the on-premises sale of beer and wine during the annual summer concert series at Mendocino Headlands State Park. The Commission will also review two concession opportunities at Old Town San Diego State Historic Park to determine whether they meet the classification and general plan requirements for the State Park unit in which they are located.

Copies of the Castle Rock State Park General Plan will be available for review at the Department of Parks and Recreation's Santa Cruz District office located at 600 Ocean Street, Santa Cruz, CA; the Santa Cruz District Mountain Sector office located at Big Basin Redwoods State Park, 21600 Big Basin Way, Boulder Creek, CA; the Department's Headquarters, 1416 Ninth Street, Sacramento, CA; the Santa Cruz County Library located at 224 Church Street, Santa Cruz, CA; and the Saratoga Community Library, located at 13650 Saratoga Avenue, Saratoga, CA.

NOTICE IS GIVEN that any person may file a statement regarding hearing items by writing to the undersigned or by presenting oral or written statements at the hearing at **9:30 a.m.** or as soon thereafter as the matter may be heard. Inquiries may be directed to Nancy Fuller, (916) 653-0524, or the State Park and Recreation Commission, P.O. Box 942896, Sacramento, CA 94296-0001.

NOTICE IS ALSO GIVEN that the Commission plans to tour Castle Rock State Park in Santa Cruz and Santa Clara counties on March 7. No public testimony and no action will be taken by the Commission during this tour.

SO ORDERED:

Rusty Areias, Secretary
State Park and Recreation Commission

PROOF OF PUBLICATION
San Jose Mercury News
750 RIDDER PARK DRIVE
SAN JOSE, CALIFORNIA 95190

IN THE
City of San Jose
STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

California Department of Parks & Recreation
Attn: Robert Ueltzen
1725 23rd Street, Suite 200
Sacramento, CA 95816
Legal ad No. 8166-L

STATE OF CALIFORNIA,)
) SS.
COUNTY OF SANTA CLARA)

The undersigned, being first duly sworn, deposes and says: That at all times hereinafter mentioned affiant was and still is a citizen of the United States, over the age of eighteen years, and not a party to nor interested in the above entitled proceedings; and was at and during all said times and still is the principal clerk of the printer and publisher of the San Jose Mercury News, a newspaper of general circulation printed and published daily in the city of San Jose in said County of Santa Clara, State of California, that said San Jose Mercury News is and was at all times herein mentioned a newspaper of general circulation as that term is defined by Sections 6000 and following, of the Government Code of the State of California, and, as provided by said sections, is published for the dissemination of local or telegraphic news and intelligence of a general character, having a bona fide subscription list of paying subscribers, and is not devoted to the interests or published for the entertainment or instruction of a particular class, professional, trade, calling, race or denomination, or for the entertainment and instruction of any number of such classes, professionals, trades, callings, races or denominations; that at all times said newspaper has been established, printed and published in the said city of San Jose in said County and State at regular intervals for more than one year proceeding the first publication of the notice herein mentioned; that said notice was set in type not smaller than nonpareil and was preceded with words printed in black-face type not smaller than non pareil, describing and expressing in general terms, the purport and character of the notice intended to be given; that the clipping of which is annexed is a true printed copy, was published and printed in said newspaper on the following dates, to-wit:

March 10, 1999

Dated at San Jose, California
this 11th day of March, 1999
I declare under penalty of perjury that the foregoing is true and correct.

Signed..... *Robert Ueltzen*
Principal clerk of the printer and publisher of the San Jose Mercury News.

NOTICE OF AVAILABILITY
PRELIMINARY GENERAL PLAN
DRAFT ENVIRONMENTAL IMPACT
REPORT
CASTLE ROCK STATE PARK

The California Department of Parks and Recreation has prepared a Preliminary General Plan and Draft Environmental Impact Report for Castle Rock State Park in Santa Cruz County.

Copies of the Preliminary General Plan and Draft Environmental Impact Report are available for public review at the Santa Cruz District Office at 600 Ocean Street, Santa Cruz; Santa Cruz City Library at 224 Church Street, Santa Cruz; Saratoga Community Library at 13650 Saratoga Avenue, Saratoga; Los Gatos City Library at 110 E. Main Street, Los Gatos; San Jose Main Library at 180 W. San Carlos Street, San Jose; San Francisco City Library at Civic Center, San Francisco; Santa Clara Central Library at 2635 Homestead Road, Santa Clara; Library, California State University, San Jose; San Jose Library, University of California at Santa Cruz, Santa Cruz; Boulder Creek Library, 13390 W. Park Avenue, Boulder Creek; Felton Library, 6299 Gashee, Felton; Scotts Valley Library, 230 Mt. Herman Road, Scotts Valley; and Northern Service Center at 1725 23rd Street, Suite 200, Sacramento, CA 95816. If there are any questions, please call Robert Ueltzen at (916) 323-0975. Comments on the Preliminary General Plan and Draft Environmental Impact Report must be received at the Northern Service Center address above by April 15, 1999.

March 10, 1999 8166-L

Castle Rock State Park Preliminary General Plan
ADDENDUM #2
March 1, 2000

This document was prepared by the California Department of Parks and Recreation as the second addendum to the Castle Rock State Park Preliminary General Plan (February 1999). This addendum #2 supersedes Addendum #1 (issued January 24, 2000) and reflects changes and revisions being made to the Preliminary General Plan and revisions still valid from Addendum #1. The underlined words indicate new or inserted text, and the strikethrough words are deleted.

Note: Addendum #1 is replaced by Addendum 2, but remains useful for reference to the changes occurring in each step of this process.

Page 53, DECLARATION OF PURPOSE

The purpose of Castle Rock State Park is to preserve the outstanding natural resources, wildland values, and supporting ecosystems of the upper watershed of the San Lorenzo River, while providing opportunities for the visiting public to enjoy and be inspired by the unique and diverse topography, geology, biotic communities, and scenic views.

To accomplish this purpose, the California State Park System is to manage the park resources for the continuing scenic, educational, scientific, and recreational benefits of present and future generations. Park management shall guide the recovery of natural processes and features in the park towards the balances that existed prior to the arrival of Euro-Americans. The Natural Preserve will be managed with the goal of achieving wilderness protection. Restoration, preservation, and education of wildland resources and ecological processes will be primary considerations within the Natural Preserve.

Page 53, UNIT VISION

~~*Castle Rock State Park becomes a place of spectacular scenic beauty—a natural area mostly unencumbered by human habitation or sensory intrusions. The park remains an integral component of the Santa Cruz Mountains ecosystem and its evolutionary processes, provides public access into this unique environment, and offers a place for visitors to enjoy and appreciate its inherent resource values.*~~

Castle Rock State Park is a place of outstanding scenic beauty possessing the vestigial wilderness qualities of the Santa Cruz Mountains, linked through biocorridors with other remnant natural ecosystems of the region. A management philosophy of protecting wildness guides visitors through the scenic vistas, interesting vegetation, and unique landforms.

The park lands and adjacent open space appear as interconnected wildlands recovering from previous human use. The visitor's quest for open space and solitude are met through an integrated system of trails and protected natural areas. Encounters with the most significant park values intensify as visitors penetrate deeper into these forested canyons. An environmental ethic guides responsible behavior and minimizes visitor impacts on the natural systems. There is a heightened awareness of the significance and sensitivity of park resources and the effect recreation may have on the health of the ecosystem, with recognition to preserve this area for future generations.

Page 59, Par. 1: Resource management program development and implementation is contingent upon the availability of funding. The Department should continue efforts to secure funding necessary for the success of this and other unitwide management programs.

Page 59, Guideline: The Department should cooperate with other landowners and regulatory agencies to address watershed issues affecting Castle Rock State Park. A plan is needed for specific management actions intended to achieve watershed management goals. The Department will develop a Watershed Management Program to remedy unnatural soil erosion and stream sedimentation problems within Castle Rock State Park.

Page 60, Guideline 1: The primary objective ~~should be~~ is to manage vegetation toward a natural condition with a minimum of disruption to natural processes.

Page 61, Guideline 2: California Black oak woodlands occurring at Castle Rock State Park should shall be considered as Special Plant Communities and their preservation should shall be a high priority in vegetation management.

Page 62, Guideline: The use of prescribed fire ~~should~~ shall be considered for ecosystem management in the park.

Page 63, Guideline 1: Suppression methods ~~should~~ shall cause the least resource damage commensurate with effective control.

Page 64, Guideline 1: Prior to any site development, heavy use activity, or prescribed burn, surveys for sensitive wildlife ~~should~~ will be conducted during the appropriate season for detection in areas that will be affected.

Page 64, Guideline 1: The Department will work with surrounding property owners and jurisdictions to reduce the numbers of non-native animals such as feral pigs, feral cats, cowbirds, bullfrogs, and starlings in the park.

Page 66, Par. 1: These differentially weathered features, including caves, spheroidal masses referred to as "cannonballs," and lattice-like structures on rock faces and walls termed "fretworks," are often very fragile ~~to the touch~~ and can be easily damaged.

Page 66, Goal: Protect and preserve tafoni features, including caves, spheroid masses called "cannonballs", and lattice-work rock walls and faces. The fossil and mineral record and specimens of Castle Rock State Park ~~should~~ will also be preserved.

Page 66, Guideline 1: Geological investigations ~~should~~ will be performed on sandstone outcrops where significant tafoni features are present in order to recommend and implement appropriate measures for their preservation.

Page 66, Guideline 3: In order to protect natural resource values, only low-impact recreational climbing (defined below) ~~should~~ will be allowed. A climbing management plan ~~should~~ will be developed that protects natural and cultural features, especially tafoni, and includes mitigation for impacts resulting from climbing.

Page 67, Guideline 1: Measures ~~should~~ will be taken to identify, record, and protect all significant prehistoric sites from adverse effects resulting from park use, development, resource management programs or natural processes such as erosion.

Page 68, Guideline 1: Measures ~~should~~ will be taken to identify and protect all significant historic sites and features.

Page 72, New Section: MANAGING RESOURCES AND VISITOR IMPACTS

It is recognized that any recreational use produces at least some impact, and that the Department needs to manage visitor impacts. Also recognized is the importance of providing and maintaining diversity in resource features and conditions of the park.

Goal: Apply processes and methods of visitor impact analysis to minimize resource impacts and maintain appropriate types and levels of visitor use within this unit.

Guidelines: In accordance with the California Environmental Quality Act (CEQA), prior to site specific development or preparation of management plans, the area of potential impact will be surveyed and reviewed by appropriate personnel and responsible agencies. Resource conditions will be periodically assessed and appropriate actions taken to maintain acceptable conditions and manage use accordingly.

Page 74, Par. 4: Castle Rock State Park has opportunities to provide a trail experience where access and low impact use remains a priority in future park management, and complements the preservation of wildlands and diverse resource values. ~~The amount of additional trails projected for the park is about 10 miles.~~

Page 79, New Guideline: Guidelines for Magnetometer Site: It is recommended that the Magnetometer Site, near Castle Rock Trail Camp, be interpreted for its own value as well as the role Russell Varian, early proponent of the park, played in developing it.

Page 81, Guideline 1: ~~Mobile food units should be considered for providing contract services to visitors of Castle Rock State Park, when operated in appropriate parking lot locations.~~

Page 81, Last Par: ~~Since it~~ It is not possible to predict all potential and compatible activities for Castle Rock State Park at this time. ~~Therefore, specific~~ Specific proposals for ~~new concessions to contract for services~~ will be considered on a case-by-case basis. Each proposal will be weighed against the purpose, vision, values, and spirit of the park as discussed in other sections of this plan.

Page 84, Natural Preserve Classification

Goal: Establish special protection and designation for sensitive plant and wildlife habitats and geologic features. ~~Provide a Natural Preserve classification of approximately 1,800 acres of~~ in the upper San Lorenzo River and Kings Creek drainages, including the area known as Lion Caves.

The management intent is to establish approximately 1,800 acres in a Natural Preserve Classification, with a primary management philosophy to protect, preserve, and interpret significant resources, and promote natural processes. Sensitive plant communities, wildlife habitats, and geologic features will receive special protection. Visitor use will be carefully monitored and managed on a few trails through the natural preserve. These selective trails will be designed for access with the least impacts, allowing visitors an opportunity to experience the wildness and serenity of the park, without disturbing critical habitats.

Page 84, Guideline 2: The natural preserve ~~should~~ will be managed as a wildlands area where natural processes can occur without interference and which provides opportunities for scientific study of interpretive and educational values, where appropriate.

Page 84, Guideline 4: ~~However, where they present erosion and other problems, the~~ The old road alignments, where they present erosion and other problems, should will be surveyed, and appropriate actions will be taken to preserve significant cultural values, while controlling erosion. removed, and the native landscape restored.

Page 85, Par. 2: TRAVERTINE SPRINGS AREA

Travertine Springs is a small, unique area of the park that exhibits travertine mineral deposits issued from natural springs. The wetlands associated with the springs are equally fragile, supporting a tall grass meadow and stands of willow, bay, and hazelnut. This is the only place of occurrence of this rare and fragile feature in Santa Cruz County.

Goal: Maintain, protect and perpetuate the Travertine Springs area of Castle Rock State Park.

Guideline: The Department should develop and implement a specific area plan that provides for the protection and preservation of the Travertine Springs features occurring in the park.

Page 86, Insert after Goal:

Partridge Farm Area Land Use Management and Development

The management intent is that the Partridge Farm Area provide the primary access, contact, and orientation for visitors to Castle Rock State Park. For most visitors, this entrance area will serve as the main trailhead parking and transitional zone between the park's wildland areas and the urbanized setting from which they come. Management will establish a new park headquarters area on this site that provides basic visitor services and information, with programs stressing park values and recreational opportunities. The open-air interpretive shelter will exhibit known natural and cultural features, and occasionally serve as an outdoor classroom. Overnight use will be considered in the form of walk-in campsites. However, day use and public contact facilities will be given a higher priority for implementation. New facilities will be esthetically designed to blend with their surroundings and respect the environment and its preservation. The entry experience for visitors to Castle Rock State Park, through Partridge Farm, will prepare visitors for a wildlands experience they will get when entering the trail system beyond.

Future management and use of the Partridge Farm Area will be guided through proper site planning and on-going evaluation of resource conditions, as well as understanding visitor and operational needs. The introduction of public access and use to this site will transform some of the current open space to developed parking, buildings, and outdoor use areas. However, the predominance of open space will be preserved and native vegetation reestablished to provide wildlife habitat and serve as a buffer between facilities and surrounding natural areas. Visitors can be oriented to the appropriate use areas and informed about the resource values and park rules and regulations. The Department will focus on mitigating visitor impacts in sensitive resource areas, establishing the initial public contact and operating functions, and improving access for people with disabilities.

An overall site plan will be prepared for the Partridge Farm Area, reflecting a phased approach to future development (see guidelines). This proposed change in land use will involve the design and construction of parking lots and entrance road in areas previously developed before the land became a state park. The design process will integrate facilities and vehicle and pedestrian circulation into the site with the least impacts on resources and surrounding activities. This site transformation and changes in the patterns of use will occur incrementally. The first phase of new parking at Partridge Farm will be managed for the primary visitor access and use of the Castle Rock Ridge area. Initially, any spaces retained in the existing Castle Rock main parking lot could serve as a secondary access for trail use. Roadside parking will be removed along the highway outside both of these parking areas. The Partridge area parking will serve first time visitors and others coming to the park headquarters office, as well as for special events. Visitors will be directed to trailheads and designated perimeter parking areas, depending on their interests and need for visitor services. Ultimately, the goal is for Partridge to become the primary entrance and day use parking area, where visitor use can be effectively managed and resources protected.

Page 86, Guideline 1, fourth sentence: Day use parking, including overnight parking for existing trail camps, and visitor facilities should be provided to support program needs. These facilities will be located away from sensitive areas. Secondly, overnight use accommodations in the form of walk-in campsites may be developed for campers who want a less primitive overnight experience than provided by the existing trail camps.

Page 86, Guideline 2: Establishment of day use parking, walk-in campsites, and other facilities at Partridge Farm should will include an assessment of the ecological and social conditions for the adjacent areas of the Black Oak Woodland, Lion Caves, and Castle Rock Ridge Resource Management Zones. It is the goal to apply processes, where feasible, and methods of visitor management to minimize resource impacts.

Page 86 , Guideline 3, first sentence: With the guidance of resource inventories, studies, and review, an overall site plan ~~should~~ will be prepared for Partridge Farm...

Page 86 , Guideline 3: With the guidance of resource inventories, studies, and review, an overall site plan ~~should~~ will be prepared for Partridge Farm. This site plan should include components for vehicle access, visitor contact, park office, parking and circulation, day use ~~and overnight use~~ areas, interpretive and operations facilities, cultural protection, buffer zones, and native plant restoration. Site planning should establish a significant buffer between facilities and sensitive resources, and consider the separation of day use, ~~overnight use~~, and administrative areas, and include reforestation (with native species) of open space areas surrounding public use facilities.

Page 87, Guideline 1: Day use parking should be provided (~~estimated at 50 to 100 cars~~)., including support facilities, such as restrooms, potable water, and appropriate trails (Refer to Parking and Access Guidelines). ~~Walk-in campsites and overnight parking (estimated at 20 campsites and 30 cars), should be developed. A campfire center, and An outdoor visitor program area and scenic overlook should~~ may be considered for development. Development projects shall include restoration and protection of native vegetation and protection of cultural features.

Page 93 (move to page 87) *All reference to camping will be deleted*

~~Overnight use of the Partridge Farm Area~~ ACCESSIBILITY

~~The park was evaluated during the general plan process for its potential to create opportunities for high-quality outdoor recreation, consistent with its resource values and classification. It was recognized that some park visitors enjoy a primitive type of recreational experience and would like extended hours of use. Others wanted campsites that were more accessible from the main parking lot.~~

~~It is also recognized that the provision for 20 walk-in campsites at the Partridge Farm area will not meet a significant amount of the demand for camping in the San Francisco Bay Metropolitan Area. However, it could provide an opportunity for statewide visitors to have the unique experience of camping on the Castle Rock Ridge and enjoying spectacular evening, nighttime, and morning hours. Currently, this is available only to those who can backpack 3 miles into the park or reside in the local community.~~

Goal: Expand access opportunities for visitors, ~~who may travel a greater distance or want to experience the park's environment during the morning and~~

evening hours. Also, eliminate physical barriers, and provide equal accessibility to all programs and facilities.

The management intent is to establish approximately 20 walk-in campsites in the Partridge Farm Area. The walk-in campsites, unlike automobile campgrounds, will not have vehicle parking next to each campsite, and visitors will be required to walk a reasonable distance from a common parking area to campsites situated in a more natural setting. Campsites and Support facilities will be designed for accessibility in accordance with ADA guidelines, and sited with minimal impact on resource values.

Prior to facility development, a resource assessment will be implemented in order to direct management on development, use limitations, and public access to the Partridge Farm Area and its surroundings. The restoration and protection of the natural communities in the area will offset unavoidable impacts associated with any development. As well, there is a commitment to provide quality interpretation of the natural and cultural values therein. Such interpretation is intended to stimulate an awareness and appreciation by all park visitors to share in the protection and preservation of these resource values.

Guidelines:

- Provide a 20-unit campground facility that serves for a Approximately 20 walk-in campsites may be developed for a tent camping experience (not for conventional car camping where users have ready access to vehicles). work out of an automobile or recreation vehicle). Campsites should would be set into a natural setting and connected accessible by trail to from developed parking and restroom facilities located out of view from the campground.
- Automobile parking should be screened with native plants and centralized or clustered away from the walk-in campsites.
- Restroom facilities should be small in scale and blended into the existing terrain and landscaped with native vegetation.
- Pathways connecting campsites to park trails shall guide users through the least sensitive resource areas.
- The design and layout of campground facilities shall consider compatibility with other uses (i.e., day use, operations, astronomy, reforestation, etc.) in the Partridge Farm area.
- Campsite provisions should be made for people with disabilities.

- ~~• Campsite installation will be based on a continual resource assessment along with mitigation measures prescribed for phasing facilities development at Partridge Farm.~~
- Programs and development in the State Park System are currently guided by the ACCESS TO PARKS GUIDELINES document, dated May 1999, on file in the Human Rights Office of our Department. These guidelines are subject to continuous review and periodically updated as new information becomes available. Additional State and Federal guidelines may also apply.

Page 88, Par. 1: GUIDELINES FOR MULTIPLE AREAS

The management intent for wildland areas surrounding the Partridge Farm and proposed natural preserve is to preserve natural resource values, protect cultural sites and features and to provide access opportunities. Recreational activities will be managed and regulated to minimize visitor impacts on resources. Designated trailheads along State Highways 9 and 35 will be improved with upgrades in safety, services, and visitor orientation.

The following goals and guidelines pertain to the management and use of areas outside the natural preserve and the Partridge Farm Area; including rock climbing, parking and access, trail camps, and the protection of historic sites and features.

Page 89, Guideline 1: A Climbing Management Plan ~~should~~ will be prepared in coordination with the climbing community to establish appropriate guidelines for climbing that protect geologic features and significant natural and cultural resources.

Page 89, Guideline 4: The resources and recreational activities outside the natural preserve ~~should~~ will be managed with methods that ensure protection of significant resource values and that maintain compatibility with adjacent parkland uses.

Page 90, Goal: Relocate the park entrance and main parking area to Partridge Farm. Phasing will allow for monitoring resource impacts and changes in visitor use, and determining the appropriate management actions to minimize resource impacts. ~~to be taken.~~

Page 91, Guideline 2: The Department ~~should~~ will perform specific site investigations and resource assessments to determine appropriate management actions and recommended mitigation.

Page 91, Overnight Parking: Existing trail camps and walk-in campsites proposed at Partridge Farm will require an estimated 30 parking spaces for overnight use. Backpackers, or campers who hike into the existing trail camps use the main parking lot. Currently, spaces in the existing main parking lot are allocated at nighttime for this purpose. The general plan guides the development and management of visitor parking and potential trail camp locations.

Goal: Provide overnight parking for visitors who want to camp overnight use areas.

Guidelines: Day use parking spaces in the existing or proposed parking lots may be allocated for overnight use of existing trail camps. The needs of resource management, trail camp users, and day use visitors should be considered in determining future parking lot capacities. The location and estimated number of parking spaces required by trail camp users depends on the total number of campsites and the use they receive. Management and use of all visitor parking is subject to change, based on resource monitoring and impact assessment programs.

Page 93, Guideline 1: Considerations for the amount and disbursement of visitor parking made available along both highways ~~should~~ will be included in establishing a basis for managing visitor use of the park.

Page 93, The OVERNIGHT USE FACILITIES section is deleted from this page and moved to page 87 with revisions as previously indicated.

Page 101, Par. 2: The general plan proposes facility development and changes, operational changes, resource management proposals and classification recommendations. The initial impetus for this general plan was the mitigation of impacts arising from existing activities and conditions. Nearly half of the park is proposed for a natural preserve classification. Walk-in camping and day use parking will be developed at the Partridge Farm area. Prescribed burning is proposed to reintroduce fire into the ecosystems, which will maintain and possibly expand native plant communities. The creation of a centralized visitor contact point at Partridge Farm will permit better visitor control and allow the provision of better public sanitation facilities. Revegetation with native plant species of the undeveloped portion of Partridge Farm will expand native plant communities, improve esthetics, and provide additional wildlife habitat. These actions will also provide mitigation for the impacts from the relocation of day use parking and the possible addition of camping at Partridge Farm. The park administrative function will be relocated to one of three possible locations...

Page 107, SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

1. There is a potential for significant traffic impacts. The entrance to Partridge Farm may require a new alignment and channelization to provide safe access and egress when it is developed for public use. Assuming ~~that each campsite generates 2 trips per day and that each day use parking site generates 4 trips per day, 240-160~~ trips per day total could be generated by Partridge Farm development. Although the volume...
2. The potential for significant visual impacts from development at the Partridge Farm does exist. The landscape has been considerably altered over the years by farm operations; however, a natural-appearing landscape is slowly reestablishing itself. The development of day-use parking ~~and walk-in campsites~~ could create an adverse visual impact to users. A parking area...

Page 112, last Par. Maximum daily use for the proposed project, assuming 428 day use parking sites, 2 turnovers per parking site and 2.3 visitors per vehicle, 40 people per bus (1 site at Sempervirens Point), ~~and 30 parking sites for walk-in camping at Partridge Farm with 2.3 visitors per vehicle:~~

$$(428 \times 2 \times 2.3) + 40 + \cancel{(30 \times 2.3)} = 2078 \text{ } \underline{2009} \text{ visitors/day}$$

The theoretical maximum daily use for the proposed project is ~~2078~~ 2009 visitors/day.

Page 119, Item number 3:

3. ~~...(20 campsites and 3.5 people per site, and 15 gallons per day per overnight user, and, for day use, (every day use parking site used twice a day, each vehicle carries 2.3 people and each person uses 5 gallons of water) the maximum total demand for Partridge Farm would be approximately 2185-1150 gallons per day or a flow of 0.003~~ .0016 cubic feet per second.

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF DETERMINATION**

TO: Office of Planning and Research
1400 Tenth Street, Room 222
Sacramento, CA 95814

FROM: California Department of Parks and
Recreation
P.O. Box 942896
Sacramento, CA 94296-0001

SUBJECT: Filing of Notice of Determination in compliance with Section 21108 of the Public Resources Code.

Project Title: **CASTLE ROCK STATE PARK GENERAL PLAN**

State Clearinghouse Number: 1997122063

Contact Person: **ROBERT UELTZEN**

Phone Number: (916) 323-0975

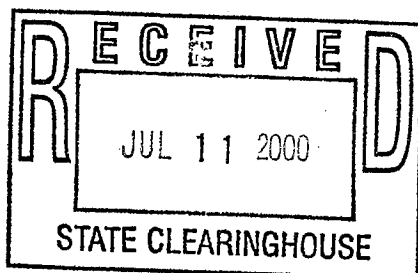
Project Location: **CASTLE ROCK STATE PARK, SANTA CRUZ AND SANTA CLARA COUNTY**

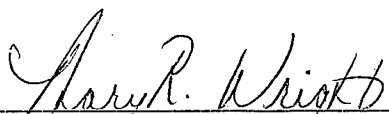
Project Description: **GENERAL PLAN FOR THE DEVELOPMENT AND MANAGEMENT OF
CASTEL ROCK STATE PARK.**

The California Department of Parks and Recreation certifies that the final environmental impact report has been prepared in conformance with CEQA, has presented the final environmental impact report to the State Park and Recreation Commission for consideration prior to approval of the general plan, and has made the following determinations regarding the project:

1. The project will not have a significant effect in the environment.
 The project will have a significant effect on the environment.
2. A Negative Declaration was prepared and adopted pursuant to the provisions of the California Environmental Quality Act (CEQA).
 A Final Environmental Impact Report has been completed in compliance with CEQA and has been presented to the decision-making body of this Department for review and consideration of the information contained in the Final EIR prior to approval of the project.
3. Mitigation measures were were not made conditions of project approval.
4. A Statement of Overriding Considerations was was not adopted for this project.
5. Findings were were not made on environmental effects of the project.

The EIR or Negative Declaration and record of project approval may be examined at the Resource Management Division, California Department of Parks and Recreation located at 1416 Ninth Street, Room 917, Sacramento, CA.





Signature **MARY R. WRIGHT**
CHIEF DEPUTY DIRECTOR

Title

Date **6/13/00**

Date Received for Filing

FINDINGS

CASTLE ROCK STATE PARK GENERAL PLAN

CULTURAL RESOURCES

IMPACT

There is a potential impact to cultural resources.

MITIGATION

Prior to site specific development or preparation of management plans, areas of potential impact will be reviewed by Departmental historians and archeologists to determine the presence and significance of cultural resources, the potential impact and recommended mitigation, if appropriate. The alteration or removal of any historic or archeological features will be subject to PRC 5024.5 review requirements. The evaluation is reviewed by the Departmental coordinator and also by the Office of Historic Preservation, if impact to a National Register-eligible site is possible.

Responsibility: Department Historian/Archeologist
Monitoring/Reporting: An evaluation required under PRC 5024.5 is submitted by Departmental historians or archeologist to the Office of Historic Preservation for their concurrence.

FINDING

The impact resulting from development or resource management projects can be mitigated to a non-significant level. Significance of impact resulting from public use to unidentified sites or resources can not be determined.

ESTHETICS

IMPACT

There are potential visual impacts.

MITIGATION

Visual impacts can be mitigated by careful siting, design, and selection of materials. Landscaping with native plant species in the Partridge Farm area could screen development of parking areas and walk-in campsites.

Responsibility: Project manager, Department of Parks and Recreation
Monitoring/Reporting: Project review required as part of the second tier CEQA process.

FINDING

The impact can be mitigated to a non-significant level.

WILDLIFE

IMPACT

There is a potential impact to wildlife.

MITIGATION

Prior to construction of facilities and trails, areas of potential impact will be surveyed for the presence of the endangered or threatened animal species. If there is a potential for impact, the Department of Fish and Game and the U.S. Fish and Wildlife Service will be consulted. Facilities or trails will be relocated to avoid impact. Nesting or spawning periods can be avoided with proper scheduling of construction or resource management activities.

Responsibility: District Staff/Resource Ecologist
Monitoring/Reporting: Project review required as part of the second tier CEQA process.

FINDING

The impact resulting from development or resource management projects can be mitigated to a non-significant level. Significance of impact resulting from public use can not be determined. Proposed resource monitoring will provide Department with basis for future evaluation.

VEGETATION

IMPACT

There is a potential impact to vegetation, including listed plant species, and sensitive plant communities.

MITIGATION

Prior to any habitat restoration or construction, the areas will be surveyed for the presence of listed plant species and sensitive plant communities. If any are found in the proposed area of construction or habitat restoration, the Department will consult with the US Fish and Wildlife Service and the Department of Fish and Game to incorporate protective measures or redesign the project to avoid impact.

Responsibility: District Staff/Resource Ecologist
Monitoring/Reporting: Project review required as part of the second tier CEQA process.

FINDING

The impact resulting from development or resource management projects can be mitigated to a non-significant level. Significance of impact resulting from public use can not be determined. Proposed resource monitoring will provide Department with basis for future evaluation.

TRAFFIC

IMPACT

There is potential impact to traffic at the entrance for Partridge Farm.

MITIGATION

The Department will consult with the CalTrans for the design requirements for providing safe access and egress at Partridge Farm. Left turn channelization and right turn acceleration and deceleration lanes may be necessary.

Responsibility: Department project manager
Monitoring/reporting: Project review required as part of the second tier CEQA process. Conformance with CalTrans standards or recommendations will be considered meeting minimum requirements.

FINDING

The impact can be mitigated to a non-significant level.