

16.2 Response to Verbal Comments (Draft EIR Hearing)

Table 16-1 identifies the list of those public agencies, organizations (e.g., professional associations, citizen groups), and individuals (e.g., private individuals and businesses) who provided verbal comments on the Public Draft EIR at an environmental hearing held on February 22, 2010 at 7:30 PM. Commenters appear below in order of their appearance before the joint meeting of the Conservancy/ MRCA Boards, which was held at the Webster Elementary School, located at 3602 Winter Canyon Road in Malibu, California.

**Table 16-1
Verbal Comments (Draft EIR Hearing)**

Number Code	Individual/Agency
1	Joyce Parker-Bozylinski, City of Malibu Planning Manager
2	Matt Haines, Corral Canyon Fire Safety Alliance
3	Susan Tellem
4	Brian Weiss
5	Lou LaMonte, Big Rock Mesas Property Owners Association, President
6	Steve Karsh, City of Malibu Public Works Commissioner
7	Rick Mullen, Ramirez Canyon Preservation Fund, President
8	Derek Tabak
9	Michael Strange
10	Joe Blaine
11	Don Cislo
12	Steve Scheinkman
13	John Mazza, Malibu Planning Commission, Vice-Chair
14	Julie Hoffman
15	Judy Villablanca, Winding Way – Murphy Way HOA, President
16	Lucile Keller, Malibu Township Council
17	Vit Petrusis
18	Daniel M. Cislo
19	Bill Rhodes, Malibu Road Property Owners Association, President
20	Dixie Moore
21	John Sibert, City of Malibu, City Councilperson
22	Jefferson Wagner, City of Malibu, Mayor Pro-Tem
23	Ari David, Malibu Road Owners Association
24	Paul Morra, Corral Canyon Fire Safety Alliance, President
25	Sonia Ottusch

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Commenter I: Oral Comments - Joyce Parker-Bozylinski, City of Malibu Planning Manager

<p><i>Introduction</i></p>	<p><i>Pursuant to State CEQA Guideline 15088, proposed written responses shall be provided to all public agencies that commented on an EIR at least 10 days prior to the certification of any EIR. The Conservancy and MRCA provided all public agencies with proposed written responses to their comments on the DEIR at least 10 days prior to the certification of this FEIR. The version of all responses contained in this FEIR constitutes the final version as any previous version was a proposed response.</i></p> <p>In response to both oral and written comments received on the Draft Environmental Impact Report (“DEIR”) for the Malibu Parks Public Access Enhancement Plan – Public Works Plan (the “Proposed Plan”) the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority (“Conservancy/MRCA”) has revised one of the alternatives detailed in the DEIR to create the Modified Redesign Alternative (“MRA”). In developing this MRA, the Conservancy/MRCA worked to refine the Redesign Alternative Plan contained in the DEIR to reduce all significant and unavoidable impacts to a level of insignificance. The Conservancy/MRCA also created the MRA to further reduce those impacts deemed insignificant (with or without mitigation) in the DEIR, but were of concern to the public. The intent was to make use of the comments received, and the analysis contained in the DEIR, to develop an alternative which was environmentally superior to the Proposed Plan analyzed in the DEIR. A detailed description of the MRA is provided in Appendix MRA-I in Volume IV of the Final Environmental Impact Report (“FEIR”) and a detailed analysis of the environmental consequences of the MRA is included in Volume IV of the FEIR which is scheduled to be released prior to the Conservancy/MRCA’s public hearing on the Plan.</p> <p>Briefly, compared to the proposed Plan, the MRA</p>
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reduces the total number of campsites from 71 to 54, eliminates the Escondido Canyon Park and Latigo Trailhead campsites included in the Proposed Plan, and clusters the 54 campsites at primarily two parks: Corral Canyon Park (17 campsites) and Malibu Bluffs Conservancy Property (35 campsites). These two campsite locations have easy access to Pacific Coast Highway (PCH). In addition, under the MRA, two accessible campsites would be implemented at Ramirez Canyon Park in Phase 2. Phased roadway/ bridge improvements for enhanced access to Ramirez Canyon Road, Delaplane Road, and/or Via Acero are proposed, if required by the appropriate fire agency. Within each park containing campsites, the campsites would be clustered. For example, at Corral Canyon Park, the campsites would be eliminated along the creek and clustered along a bluff overlooking the Pacific Ocean. Clustering is intended to facilitate the oversight/management of the camp areas, result in lower operational costs, and maximizes the efficiency and effectiveness of fire protection and relocation efforts.

Under the MRA, day use facilities would be provided at Corral Canyon Park, the Malibu Bluffs Conservancy Property, Ramirez Canyon Park and Latigo Canyon. At Escondido Canyon Park the MRA includes only trail improvements to connect the proposed Coastal Slope Trail from Murphy Way to Latigo Trailhead.

Additionally, numerous project features have been added in the MRA to address the community's fire concerns. Under the MRA, for example, cooking would be limited to small electrical cook stations, and the use of flame-less cook-stoves and lanterns would be required. Further, a camp host, staff maintenance person, or Ranger, (all of whom would be wildland fire-trained), would be required to be onsite at park properties included in the MRA, during times when camping is permitted at the location. All MRCA rangers and camp hosts will be designated and trained as public officers under the provisions of the

	<p>State Penal Code and would be able to strictly enforce this cold camp policy.</p> <p>The Final EIR includes an analysis of the MRA as well as a MRA Fire Protection Plan. The responses to comments that follow address the comments on the DEIR and indicate where concerns raised by oral or written comments will be potentially eliminated or reduced with the adoption of this MRA.</p>
QUESTION/COMMENT	RESPONSE
<p>#I-I: Project inconsistent with 2002 LCP, particularly Ch. 4 (ESHA) and Ch. 6 (Scenic Resources).</p>	<p><i>This comment expresses the commentor's concerns relative to the project's consistency with adopted LCP policies.</i></p> <p>RESPONSE:</p> <p>Consistency of the project with the adopted 2002 LCP as well as the Malibu Parks Public Access Enhancement Plan Overlay is discussed within Section 4.0, <i>Consistency with Plans & Policies</i>, and Section 5.14, <i>Land Use & Planning</i>. Discussion of ESHA and Visual/ Scenic Resources policies is contained therein. Ultimate findings of policy consistency will be determined by co-lead agencies (MRCA/ Conservancy), as well as by the California Coastal Commission, as part of any project approval. It should be noted that on June 10, 2009, the Coastal Commission certified the Public Parks Access Enhancement Plan (Overlay). To the extent that the 2002 LCP conflicts with the certified Overlay, the Overlay controls.</p> <p>Additionally it should be noted, that in response to comments, both oral and written, a Modified Redesign Alternative is being proposed for consideration and adoption by the Conservancy/MRCA. This alternative contains its own policy consistency analysis with the 2002 LCP and Overlay, and concludes that all previous land use impacts based on an inconsistency with the LCP caused by impacts to ESHA have been eliminated with mitigation to a less than significant level.</p>

	<p>The Modified Redesign Alternative includes park and recreation improvements that would be redesigned and generally reduced in scope throughout the Plan area, and includes feasible mitigation to reduce potential environmental impacts to less than significant levels. In addition, a detailed policy consistency analysis for the Modified Redesign Alternative-Public Works Plan incorporates additional analysis based on comments received on the DEIR and the redesigned/reduced scope of improvements. With these Modified Redesign Alternative project elements, land use impacts related to potential conflicts with policies addressing geologic hazards and protection of environmentally sensitive habitat areas, adopted for the purpose of avoiding or mitigating an environmental effect, would be reduced to <i>potentially significant, but mitigable (Class II)</i>,</p>
<p>#1-2: Disagrees w/ Section 4.4 conclusions. Disagrees w/ Fire Hazard analysis. More detailed written comments to follow.</p>	<p><i>This comment expresses the commentor's disagreement with the analysis/ conclusions identified within Section 4.0, Consistency with Plans & Policies, and Section 5.6, Fire Hazards, and expresses that additional detailed written comments will be provided later.</i></p> <p>RESPONSE:</p> <p>Comments noted. Responses to the referenced detailed written comments have been provided (see Comment Letter GG directed to the City of Malibu as enclosed).</p>

Commenter 2: Matt Haines, Corral Canyon Fire Safety Alliance	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#2-1: Please identify structure and its use located at AIN 4457013055. Parking/unloading in this location unsafe. Location of structure at top of hill could be problematic due to high speeds attained there; reconsider location.	<p><i>This commenter asks about a fire structure plan detail and expresses concerns relative to use of the structure in close proximity to high-speed traffic along Corral Canyon Road.</i></p> <p>RESPONSE:</p> <p>The referenced structure (located northeast of Malibu Hills and adjacent to Corral Canyon Road) is an optional fire shelter intended for emergency occupancy in the event of a wildfire. See, also, DEIR Figure 2-5d, as well as DEIR <i>Appendix D-1</i>, Sheet 19, for plan details. The provision of a fire shelter at this location is optional and will only be provided should L.A. County Fire Department deem it necessary; fire shelters are further discussed within the Project Description and within DEIR <i>Appendix I</i> (Fire Protection Plans).</p> <p>No parking or loading is proposed at this location. The structure would be located along a straight section of road approximately 350 feet from the nearest bend in the road located to the north and would be located outside the Corral Canyon Road right-of-way. According to ATE (the project traffic engineer), a fire shelter at this location would not impede traffic visibility or result in unsafe traffic movements.</p>
#2-2: Proposed crosswalk at Corral is at the steepest portion of road and in winding areas. Vehicles will not be able to stop. A new crosswalk location should be considered further downhill.	<p><i>This commentor expresses concerns relative to trail crossings and trail crossing visibility along Corral Canyon Road, particularly in light of the immediately surrounding topography.</i></p> <p>RESPONSE:</p> <p>In the course of considering trail crossings at Corral Canyon Road (see DEIR <i>Appendix D-1</i>, Sheet 18), sight distance was considered by the design engineer.</p>

	<p>According to ATE (the project traffic engineer), painted crosswalks are not warranted and therefore not recommended where the trails cross Murphy Way, Latigo Way, and Corral Canyon Road. These roadways carry low volumes and vehicles travel at relatively low speeds (30 MPH or less); signage is recommended to be installed on the trails to notify pedestrians/hikers of vehicle traffic at the road crossings.</p> <p>Within the DEIR, Section 2.0, <i>Project Description</i>, identified that signs would be posted at “park access points, trailheads, parking lots, road crossings, and linkages or intersections with other trails or roads, and would include safety signs, including, but not limited to, road crossing signs and yield/warning signs on multi-use trail segments.”</p> <p>The PWP policies and implementation measures (see DEIR <i>Appendix C</i>) provide guidance on the type of signs necessary to assist the public in identifying public parks, and locating and recognizing trail access points, public support facilities, potential natural hazards, and park rules, etc. Road crossing signs and yield/warning signs on multi-use trail segments would fall within the contemplated Sign Program described within DEIR, Section 2.0, <i>Project Description</i>.</p> <p>The following clarification language is provided regarding DEIR Section 2.0, <i>Project Description</i>:</p> <p style="text-align: center;"><u>“Trail signs would also be posted at road crossings notifying hikers and other trail users to exercise caution in crossing the road and to be aware of and yield to on-coming traffic.”</u></p> <p>Based upon the above discussion and the analysis contained within the DEIR; with the above clarification, no further revision of the DEIR would be required.</p>
<p>#2-3: Camping at bluffs site at Corral Canyon is a good location. Camping location in canyon should be</p>	<p><i>This commentor expresses support for Corral Canyon Camp Area 1, with reservations related to Camp Area 2 (see Appendix D-1, Sheets 25-28) concerns relative to trail crossings and trail crossing visibility along Corral Canyon Road, particularly in light of the immediately</i></p>

<p>reconsidered. Trail access is too steep and cuts into a sensitive, natural geologic formation that also acts as a wind barrier at canyon campsite and is a fire danger. Relocate hike-in ADA camp to east side of creek and west of bluffs.</p>	<p><i>surrounding topography.</i></p> <p>RESPONSE:</p> <p>DEIR Section 5.7, <i>Geology, Soils, & Seismic Hazards</i>, speaks to geology within the Corral Canyon area. While portions of the trail system at this location would be located within an area of identified landslide, no structures are proposed within landslide areas; trail use was considered by the project geologist to be an acceptable use with low level risk.</p> <p>A Fire Protection Plan (FPP) has been created for the entire project area, with individual plans prepared for each park site (see DEIR <i>Appendix I</i>). DEIR Section 5.6, <i>Fire Hazards</i>, speaks to impacts relating to Fire Hazards. Camping would not be permitted during red flag wind events. In addition, each camp area would employ a host of Site Specific Fire Protection Measures, as identified in the FPP, including vegetation management to reduce fuels around campsites, having wildland fire-trained personnel on-site at all times when camping is permitted, having on-site wildland fire hydrants, fire extinguishers, etc. No campfires or open-flame stoves would be permitted. When compared to the baseline condition of the existing Plan area (where recreational access is already occurring, both legally and illegally) the likelihood of a campsite fire incident, which could get out of control, would be substantially diminished under the proposed FPP.</p> <p>A Modified Redesign Alternative has been added to the FEIR which would relocate all camping at Corral Canyon to the area east of the creek, on the bluff overlooking PCH. The Proposed Project along with this alternative will be considered by the Conservancy/MRCA Boards. Please see Topical Response #1, along with Chapter 14 of the FEIR.</p> <p>Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.</p>
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Committer 3: Susan Tellem	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#3-1: Campfires started by lost hikers trying to get warm in a cold canyon can't be avoided. Hosts won't be at campsites full-time to prevent improper activities that could result in fire danger.	<p><i>This commenter expresses concerns related to Fire impacts along trails and at campsites.</i></p> <p>RESPONSE:</p> <p>A Fire Protection Plan (FPP) has been created for the entire project area, with individual plans prepared for each park site (see DEIR Appendix I). DEIR Section 5.6, <i>Fire Hazards</i>, speaks to impacts relating to Fire Hazards.</p> <p>The EIR acknowledges an existing baseline condition that “given the climatic, vegetation, and topographic characteristics of the Plan area region, along with the fire history and fire behavior modeling results..., the Plan area is determined to be potentially vulnerable to wildfire starting in, burning onto, or spotting onto the site.”</p> <p>Restrictive policies have been outlined in the FPP to reduce the wildfire risk associated with the proposed project. The FPP provides details regarding site-specific policies and implementation measures that would govern these park areas with regards to fire protection. The FPP outlines a "systems approach" to fire prevention, protection, suppression, and emergency relocation to ensure proposed park improvements and uses will reduce potential risks associated with fire hazard. Important concepts included in this approach include pre-planning for emergency response, funded ongoing fuel modification, structural protection, water supply, access (ingress/egress), and fire shelters.</p> <p>For trails, through vegetation management, posting of fire danger information at trailheads, patrolling and strict enforcement of</p>

	<p>existing and proposed access and fire policies (as identified in the Fire Protection Plan), when compared to the baseline condition of the existing Plan area (where recreational access is already occurring, both legally and illegally) the likelihood of a lost hiker starting a camp or signal fire, which could get out of control, would be substantially diminished under the proposed FPP.</p> <p>For campsites, each camp area will employ a host of Site Specific Fire Protection Measures, as identified in the Fire Protection Plan, including vegetation management to reduce fuels around campsites, having wildland fire-trained personnel on-site at all times when camping is permitted, having on-site wildland fire hydrants, fire extinguishers, etc. When compared to the baseline condition of the existing Plan area (where recreational access is already occurring, both legally and illegally) the likelihood of a campsite fire incident, which could get out of control, would be substantially diminished under the proposed FPP.</p> <p>At times of year when trail use/ camping is not permitted and during red flag events, the campsites and trails would be regularly patrolled to ensure that unsanctioned use of the park sites is kept under strict control. When compared to the existing baseline condition of the existing Plan area (where recreational access is already occurring, both legally and illegally) the likelihood of a trail-side or campsite fire incident occurring at times of year when trail use/ camping is not permitted and during red flag events would be substantially diminished under the proposed FPP.</p> <p>Further, please see Topical Response #1. Under this Modified Redesign Alternative, certain measures have being included in the MRA FPP, as detailed in Topical Response #2, which would further serve to ensure that there would be no substantial increase in risk above existing conditions.</p> <p>Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.</p>
#3-2: Project EIR can't	<i>This commentor expresses concerns related to the existing biological</i>

<p>have less than significant impacts due to scope of improvements and when environment was previously in pristine condition.</p>	<p><i>environment and how the project may impact it.</i></p> <p>RESPONSE:</p> <p>Plan improvements have been located to the greatest extent feasible within previously disturbed areas. Section 5.4, <i>Biological Resources</i>, identifies the existing biological conditions of the Plan area. The EIR requires mitigation and habitat restoration for identified project impacts to biological resources. With incorporation of mitigation, all biological impacts would be reduced to less than significant.</p> <p>Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.</p>
<p>#3-3: Who will monitor impacts (noise) to the gnatcatcher? Additional written comments will be forthcoming.</p>	<p><i>This commentor expresses concerns related to noise impacts to the California gnatcatcher.</i></p> <p>RESPONSE:</p> <p>Section 5.4, <i>Biological Resources</i>, identifies that while it is unlikely that California gnatcatchers are present in the Plan area, there is a possibility that this species could be present in areas supporting suitable habitat. Mitigation Measure MM BIO-8 requires that a biologist conduct pre-construction surveys in accordance with USFWS protocol and that adequate noise protections be employed if California gnatcatchers are determined to be present.</p> <p>Further, please see Topical Response #1. Under this Modified Redesign Alternative, proposed camp sites would be clustered primarily in two parks: Corral Canyon Park and Malibu Bluffs. The clustering of camp sites would further reduce the potential for disturbance to the California gnatcatcher, as compared to the Proposed Plan.</p> <p>Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.</p>

Commenter 4: Brian Weiss	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
<p>#4-1: Appreciates more trails. Camping at bluffs location at Corral is reasonable. Hike-in site at Corral Canyon has issues, although likes changes made from original design (supports proposed fire hoses). Wants additional information on camping site supervision during red flag days, and supervision for not only when camping is authorized. How will non-permitted occupancies of campsites be monitored. Please work with residents to come up with a reasonable camp site supervision plan.</p>	<p><i>This commenter expresses his view on the acceptability of trails and camping at Corral Canyon and requests additional information on supervision of campsites when occupancy is not officially sanctioned.</i></p> <p>RESPONSE:</p> <p>Section 2.3.4 (Fire Protection Plan) and Section 2.3.5 (Operations & Maintenance) within the Project Description summarize the methods that will be employed to ensure that non-permitted occupancies of the campsite(s) will not be tolerated. Regardless of the campsites being open or closed, the Plan includes 7 hours of patrol per day. Patrols would be stepped up during red flag days to provide 24-hour coverage. Standard parkland rules regulations would be posted and enforced, including no fires, no smoking, etc. Violations of Red Flag Day closure policy would be punishable and would result in significant fines. In light of the system approach outlined within the FPP, the supervision of Plan area campsites would be considered adequate to prevent and/or react to a wildfire occurrence.</p> <p>Further, please see Topical Response #1. Under this Modified Redesign Alternative, certain measures have been included in the MRA FPP, as detailed in Topical Response #2, which would further serve to ensure that there would be no substantial increase in risk above existing conditions. For instance, proposed campsites under the MRA would primarily be clustered at only two park properties: Corral Canyon Park and Malibu Bluffs. At each of these locations, permanent quarters would be provided for ranger or park staff who would perform camping registration and supervision in-person.</p>

	Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.
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Commenter 5: Lou LaMonte, Big Rock Mesas Property Owners Association, President	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#5-1: Concerned with the process. 15 million people visit Malibu because of local environment/ natural beauty—it is this way because of local residents' environmental sensitivities. There's a chance for reasonable compromise. Don't dictate to Malibu residents.	<i>This commenter expresses his views on the Plan area and resident relations with Conservancy/MRCA.</i> RESPONSE: This comment does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.

Commenter 6: Oral Comments - Steve Karsh, City of Malibu Public Works Commissioner

Introduction

Pursuant to State CEQA Guideline 15088, proposed written responses shall be provided to all public agencies that commented on an EIR at least 10 days prior to the certification of any EIR. The Conservancy and MRCA provided all public agencies with proposed written responses to their comments on the DEIR at least 10 days prior to the certification of this FEIR. The version of all responses contained in this FEIR constitutes the final version as any previous version was a proposed response.

In response to both oral and written comments received on the Draft Environmental Impact Report (“DEIR”) for the Malibu Parks Public Access Enhancement Plan – Public Works Plan (the “Proposed Plan”) the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority (“Conservancy/MRCA”) has revised one of the alternatives detailed in the DEIR to create the Modified Redesign Alternative (“MRA”). In developing this MRA, the Conservancy/MRCA worked to refine the Redesign Alternative Plan contained in the DEIR to reduce all significant and unavoidable impacts to a level of insignificance. The Conservancy/MRCA also created the MRA to further reduce those impacts deemed insignificant (with or without mitigation) in the DEIR, but were of concern to the public. The intent was to make use of the comments received, and the analysis contained in the DEIR, to develop an alternative which was environmentally superior to the Proposed Plan analyzed in the DEIR. A detailed description of the MRA is provided in Appendix MRA-1 in Volume IV of the Final Environmental Impact Report (“FEIR”) and a detailed analysis of the environmental consequences of the MRA is included in Volume IV of the FEIR which is scheduled to be released prior to the Conservancy/MRCA’s public hearing on the Plan.

Briefly, compared to the proposed Plan, the MRA

reduces the total number of campsites from 71 to 54, eliminates the Escondido Canyon Park and Latigo Trailhead campsites included in the Proposed Plan, and clusters the 54 campsites at primarily two parks: Corral Canyon Park (17 campsites) and Malibu Bluffs Conservancy Property (35 campsites). These two campsite locations have easy access to Pacific Coast Highway (PCH). In addition, under the MRA, two accessible campsites would be implemented at Ramirez Canyon Park in Phase 2. Phased roadway/ bridge improvements for enhanced access to Ramirez Canyon Road, Delaplane Road, and/or Via Acero are proposed, if required by the appropriate fire agency. Within each park containing campsites, the campsites would be clustered. For example, at Corral Canyon Park, the campsites would be eliminated along the creek and clustered along a bluff overlooking the Pacific Ocean. Clustering is intended to facilitate the oversight/management of the camp areas, result in lower operational costs, and maximizes the efficiency and effectiveness of fire protection and relocation efforts.

Under the MRA, day use facilities would be provided at Corral Canyon Park, the Malibu Bluffs Conservancy Property, Ramirez Canyon Park and Latigo Canyon. At Escondido Canyon Park the MRA includes only trail improvements to connect the proposed Coastal Slope Trail from Murphy Way to Latigo Trailhead.

Additionally, numerous project features have been added in the MRA to address the community's fire concerns. Under the MRA, for example, cooking would be limited to small electrical cook stations, and the use of flame-less cook-stoves and lanterns would be required. Further, a camp host, staff maintenance person, or Ranger, (all of whom would be wildland fire-trained), would be required to be onsite at park properties included in the MRA, during times when camping is permitted at the location.

The Final EIR includes an analysis of the MRA as well as a

	<p>MRA Fire Protection Plan. The responses to comments that follow address the comments on the DEIR and indicate where concerns raised by oral or written comments will be potentially eliminated or reduced with the adoption of this MRA.</p>
QUESTION/COMMENT	RESPONSE
<p>#6-1: EIR statements relative to local drainage conditions contain falsehoods. Refer to Item 5.0-1-5. There is a drain that dumps unabated water from Malibu Bluffs to private property (Malibu Road area that affects 175 homes and Pacific Coast Highway). This area has failed in the past. Without further study, Conservancy could be exposed to a class action lawsuit. Refer to Kathy Chu letter, which will be made available, for add'l background.</p>	<p><i>This commentor expresses concerns relative to the adequacy of the identification/ description of local drainage conditions at the Malibu Bluffs area.</i></p> <p>RESPONSE:</p> <p>As indicated in Section 5.10, <i>Hydrology, Drainage, and Water Quality</i>, Impact HYD-2 discusses drainage and flooding; Penfield & Smith, the project engineer, has determined that “Plan implementation would not substantially alter the existing drainage pattern of any of the Plan sites, nor would Plan implementation substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.”</p> <p>According to Penfield & Smith (07-23-10), a search of storm damage reports in the Malibu area, particularly along Malibu Road, indicates that home damage has occurred largely due to wave action during storm periods, not flooding from adjacent culverts.</p> <p>In July 2010, Penfield & Smith made an additional site visit to identify/ review the culvert along Malibu Road identified by the commentor. Penfield & Smith also contacted LA County Public Works Department to discuss the culvert.</p> <p>Based on Penfield & Smith’s conversations with LA County Public Works Department (Patrick Holland, 07-20-10), the size of the culvert was determined to be 6 ft wide x 6 ft high. Using standard culvert analysis methods, the capacity of the culvert was calculated to be 375 cubic feet per second. The existing 100-year clear water flow</p>

rate at Malibu Road is 510 cfs. This indicates that under the existing baseline condition during a 100-year storm event, that there will be approximately 135 cubic feet of water crossing Malibu Road. There is an overland escape route provided for overflows from Malibu Road in the form of a stairway down to the beach. However, a storm water quality treatment unit, located on the northerly side of Malibu Road, was recently constructed by Los Angeles County Department of Public Works (Patrick Holland, 07-20-10). Under the 100-year flood condition, the existing unit would block flow to the overland escape over Malibu Road, directing flow away from the open stairway and potentially towards homes on Malibu Road.

According to Penfield & Smith (07-23-10), potential project peak drainage flow increases due to the proposed improvements within this watershed would be mitigated by the use of Low Impact Design (LID) applications, including permeable paving and vegetated filters, such that there would be no calculable increase in peak flows within the culvert discharging to Malibu Road. Since there would be no measurable increase in peak flow from the proposed improvements, the existing off-site flood safety situation would not measurably change compared to the pre-project condition and would not result in any greater impacts than that which already exist currently.

Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.

Commenter 7: Rick Mullen, Ramirez Canyon Preservation Fund, President	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#7-1: Will offer further written comments at the end of the comment period. Understands that there will be a hearing on the PWP after consideration of the Final EIR. Appreciates the new Lauber Property access road identified in the Alternatives—one approach to addressing Fund’s concerns. Understands that KGR was not consider a viable alternative b/c of lack of front country trail linkages, but perhaps a blended alternative could be considered, with large group events and some/ all overnight camping at KGR, with balance of uses in front country—something to consider.	<p><i>Commenter expresses appreciation for Lauber property access identified within Section 8.0 Alternatives, and asks that a blended alternative with trails in the Malibu front country, coupled with camping at King Gillette Ranch (KGR) be considered.</i></p> <p>RESPONSE:</p> <p>The analysis of project alternatives in this EIR focuses on a reasonable range of alternatives consistent with CEQA Guidelines Section 15126.6(a). Accordingly, Section 15126.6(a) states:</p> <p><i>An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.</i></p> <p>The alternatives evaluated within Section 8.0 address a reasonable range of alternatives. In addition to the required No Project Alternative, two other alternatives, including the 2002 LCP Alternative and a Redesign Alternative, were evaluated in the DEIR to minimize potentially significant environmental effects associated with the proposed Plan’s projects, while achieving most of the Plan’s objectives (see</p>

	<p>Section 8.1.2). A discussion of other Alternatives considered, but rejected is located within Section 8.1.3. An additional alternative, the Modified Redesign Alternative, has been included in the FEIR for consideration by the Conservancy/MRCA Boards. Please see Topical Response #1.</p> <p>Use of KGR as a camping area, with trails located in the Malibu front country, would not satisfy the project objective of an emphasis on pedestrian circulation between park areas and the shoreline as a primary form of circulation, nor would it provide low-impact and low-cost camping and trail facilities for all persons in the coastal zone, and specifically the Malibu coastal zone.</p>
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Commenter 8: Derek Tabak	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#8-1: Exec. Summary (p.52) allows campfire exceptions to be made by Exec. Officer. Who is that?	<p><i>Commenter alludes to a concern relative to campfire exceptions and requests more information relative to existing MRCA Ordinance No. I-2005.</i></p> <p>RESPONSE:</p> <p>Please note that on May 10, 2010, MRCA Ordinance No. I-2005 was amended to remove the ability of the Executive Officer to issue special use permits contrary to the Malibu Parks Public Access Enhancement Plan – Public Works Plan. Furthermore, the Fire Protection Plan (FPP) (<i>Appendix I, Page 60</i>), which is a part of the Public Works Plan (PWP), will establish the following new restriction within Plan area: “No person shall make or maintain, nor aid and abet others in making or maintaining a campfire or any other open fire in any of the park facilities. The only cooking apparatus permitted shall consist of self-contained propane stoves, when permitted and consistent with the terms of the FPP. No kerosene or white gas lanterns shall be permitted.”</p> <p>Further, a Modified Redesign Alternative has been proposed for consideration by the Conservancy/MRCA. Please see Topical Response #1. This Modified Redesign Alternative includes within its FPP, a further limitation that mandates the use of flameless cook-stoves and lanterns within the camp areas. As part of the Modified Redesign Alternative PWP, an all-weather electrical outlet will be provided to allow for small electrical cooking appliances at campsites.</p> <p>Thus, if the PWP (and associated FPP) either for the Public Works Plan analyzed in the DEIR, or the Modified Redesign Alternative detailed in the FEIR is approved, while the Executive Officer would continue to be able to make well-reasoned</p>

	<p>exceptions to the no campfire rule for areas outside the PWP area, there would be <u>no</u> campfire exceptions within the PWP area.</p> <p>Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.</p>
<p>#8-2: Env. Setting (p.11). Where are the park rangers? None are stationed at any of the proposed locations.</p>	<p><i>Commentor queries why no park rangers are stationed at the proposed PWP park locations.</i></p> <p>RESPONSE:</p> <p>Section 3.0, <i>Environmental Setting</i>, speaks to the existing baseline condition. While it is true that the closest MRCA Ranger Station is located at King Gillette Ranch (approximately 6 miles from Malibu Bluffs), park rangers are out conducting routine patrols of all park locations from approximately 6:00 a.m. to 1:00 a.m. each and every day, with the exception of red flag days, when ranger patrols are increased to 24 hours per day. MRCA’s single patrol station, from which service personnel disburse to cover a larger geographic area, is quite similar to the police protection services provided by LASD, which operates out of Agoura Hills, but serves the City of Malibu, City of Calabasas, City of Westlake Village, City of Hidden Hills, and the surrounding unincorporated communities.</p> <p>Under the Modified Redesign Alternative, the Conservancy and MRCA considered this fire risk concern and incorporated components into the alternative that would reduce any fire risk. This alternative would limit camping to primarily two locations: Corral Canyon Park and Malibu Bluffs Conservancy Property. Both campsites would be clustered at each location to facilitate patrolling of each campsite. Additionally, both campsites are in close proximity to PCH to allow easy highway accessibility. Further, under the Fire Protection Plan for this alternative included in the FEIR, a strict cold camp policy prohibiting the use of propane stoves and other flame-emitting devices would be strictly enforced. The only approved cooking devices would be small electrical cooking appliances compatible with a park provided all-weather electrical outlet. Lastly, the Modified</p>

	<p>Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp host, or staff maintenance person to strictly enforce this cold camp policy and further reduce any fire risk associated with the Plan. All MRCA rangers and camp hosts would be designated and trained as public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to strictly enforce the Plan cold camp policy. Please see Topical Responses #1 and #2.</p> <p>Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.</p>
<p>#8-3: Project Description. How much time will be allotted for rangers to visit each site? Park rangers—where will they be stationed? Camp hosts—where will they be stationed? Will they live on-site or visit? Maintenance—how will sites be maintained during construction and w/ budget reduction?</p>	<p><i>Commentor requests several clarifications relative to the Project Description, which dovetails into a question on Air Quality emissions during project construction.</i></p> <p>RESPONSE:</p> <p>The section “Ranger Services, Patrols, and Enforcement” within Section 2.0, <i>Project Description</i>, identifies ranger patrol information. Time allotment at individual parks would be determined by MRCA based on experience and field indicators. Sites will be maintained during construction consistent with an approved SWPPP and applicable mitigations identified within the DEIR. Budgetary issues need not be evaluated within the context of CEQA—please see response to comment K-23.</p> <p>Lastly, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp host, or staff maintenance person at the times that camping is permitted and this would reduce any fire risk associated with the Plan. All MRCA rangers and camp hosts would be designated and trained as public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to strictly enforce the Plan cold camp policy. Please see Topical Response #1.</p> <p>Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be</p>

	required.
<p>#8-4: Project Description. Construction Schedule (p. 47)—Inconsistency within the EIR. EIR indicates 11.3 miles of trail will take place during 12-week construction for camp areas. 196 days is extremely optimistic. Construction will take longer and will be an inconvenience for residents. If construction takes longer, Air Quality emissions analysis would be inaccurate.</p>	<p><i>Commentor requests clarification relative to Air Quality emissions during project construction.</i></p> <p>RESPONSE:</p> <p>Total combined air pollutant emissions resulting from construction of the proposed Plan improvements is independent of the construction scenario’s duration of phases. The SCAQMD Air Quality significance thresholds for construction activity are based on maximum mass of pollutant emissions per day; accordingly, the significance of short-term construction impacts is determined based on daily emissions.</p> <p>To conservatively model emissions generated during construction of the proposed improvements, the maximum (or worst-case) scenario assumes that construction would occur under ideal conditions without any constraints such as weather, available man-power, or existing terrain and vegetation.</p> <p>Under this conservative scenario, when construction at each park or improvement site would occur concurrently, proposed construction would have the potential to exceed the threshold for one of the six criteria pollutants modeled. As such, mitigation is required that would require construction scheduling to occur sequentially (MM AQ-1.1), thus resulting in a construction timeline greater than 12-weeks.</p> <p>Maximum daily emissions would decrease as a result of a longer construction phase as more time would be available to complete the same total proposed construction work.</p> <p>The air quality analysis provided in Section 5.3, <i>Air Quality</i>, estimates emissions and determines significance of potential short-term impacts consistent with the guidance and thresholds provided by the SCAQMD and CEQA.</p> <p>Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.</p>

Commenter 9: Michael Strange	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
<p>#9-1: Concerned about unwillingness to address his previous comments (October 6 letter). Concerned about law of unintended consequences. Supporter of trails & better use of trails, but does not want parking/ camping at Latigo Trailhead which would only(?) be used by cyclists. Camping sites will have to be managed 365 days per year. Because adjacent owner at Latigo shares driveways access, it will not be able to be locked off when not in use. It is a poor use of resources to provide a camp host for only 5 campsites. Has little faith in ability of MRCA to control trash/ dumping.</p>	<p><i>Commenter is concerned about the management and use of the proposed Latigo Trailhead facility.</i></p> <p>RESPONSE:</p> <p>Comments contained within the commentor’s October 6th letter were considered in preparation of the DEIR.</p> <p>The EIR acknowledges that it is the existing baseline condition that “given the climatic, vegetation, and topographic characteristics of the Plan area region, along with the fire history and fire behavior modeling results..., the Plan area is determined to be potentially vulnerable to wildfire starting in, burning onto, or spotting onto the site.”</p> <p>With respect to the “law of unintended consequences,” restrictive policies have been outlined in the FPP to reduce the wildfire risk associated with the proposed project. The FPP provides details regarding site-specific policies and implementation measures that would govern these park areas with regards to fire protection. The FPP outlines a "systems approach" to fire prevention, protection, suppression, and emergency relocation to ensure proposed park improvements and uses will reduce potential risks associated with fire hazard. Important concepts included in this approach include pre-planning for emergency response, funded ongoing fuel modification, structural protection, water supply, access (ingress/egress), and optional fire shelters.</p> <p>Access to Latigo Trailhead would be open to all people, including cyclists, and would provide a valuable and much needed parking and trailhead facility within this area of Malibu.</p>

Although the campsites and during the off season, the site would be supervised and managed year-round. Access to the site would be controlled via a swinging metal gate (see DEIR, *Appendix D-1*, Sheet 16, Note #67), which would not prohibit driveway access for the adjacent owner.

The allocation of resources for the provision of recreational amenities at Latigo Canyon, which will be made available to the public at little to no cost, will be made by the Conservancy/MRCA Boards.

Consistent with the Trash Services section of the *Project Description* (Section 2.0), regular trash service and litter pick-up would be associated with the developed Latigo Trailhead site.

Further, please see Topical Response #1. Under this Modified Redesign Alternative, all campsites and camp host accommodation would be eliminated at the Latigo Canyon trailhead. A small vehicle parking lot, picnic areas, one restroom, and improved trail connections are the only improvements proposed for Latigo Canyon trailhead under the MRA.

Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.

Commenter 10: Joe Blaine	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#10-1: Care-giver for terminal-case patients in Malibu area. There are 20 areas along PCH that are government-owned that would be far safer sites than those sites which are proposed, examples include lower Topanga, Malibu Creek State Park, Solstice Canyon Park, District of Water & Power property, and Dockweiler County Beach.	<p><i>Commenter suggests safer sites as potential alternatives for consideration.</i></p> <p>RESPONSE:</p> <p>Consistent with CEQA Guidelines Section 15126.6(a), “[a]n EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.”</p> <p>Five (5) potential off-site alternatives for the proposed Plan’s park uses and improvements were considered and rejected by the California Coastal Commission as part of the Overlay proceedings (see DEIR, <i>Appendix R</i>) in June, 2009 (King Gillette Ranch, Charmlee Park, Solstice Canyon Park, Tuna Canyon Park, and the Zume/Trancas Canyon Units if the Santa Monica Mountains National Recreation Area). The EIR again considered the five (5) off-site alternatives and concluded none would meet the basic project objectives.</p> <p>It should be noted that CEQA Guidelines Section 15126.6(b) requires that the “discussion of alternatives to the project or its location” be capable of “avoiding or substantially lessening any of the significant effects of the project.”</p> <p>In the case of the Proposed Project, there were two (2) significant and unavoidable impacts associated with the project which guided the selection of the alternatives: 1) geologic/ land use impacts at Latigo Trailhead associated with the location of permanent recreational improvements on a landslide and 2) land use impacts associated with inconsistencies with Coastal</p>

Act/ LCP Policies associated with impacts to environmentally sensitive habitats from new, non-resource dependent development.

While the Conservancy/MRCA believe that a reasonable range of alternatives has been considered in order to allow for informed decision-making, the alternative sites mentioned by the commentor were considered by the Conservancy/MRCA and were determined to be not feasible, inconsistent with the project objectives, and/or likely to result in similar or greater environmental impacts than the proposed project. Brief justifications for the rejection of the suggested alternatives are identified below.

Lower Topanga Canyon Park and Topanga Motel (State Park Service)

- Site is isolated from the remainder of the PWP sites and offers no trail or transit connectivity.
- At this site it would be difficult to separate vehicle access roads and parking from campgrounds, providing a visitor nature experience inferior to that found at the primary sites for this project.
- State Park Service is currently drafting a new General Management Plan for this park. The official Notice of Preparation (March 2010) for this plan makes no mention of developing camping facilities. The current State Park emphasis is on restoring the bungalows, and a complimentary and compatible camping component is not currently being explored.

Malibu Creek State Park

- No public transportation is available to or from Malibu Creek State Park.
- At existing campgrounds, there is little separation between vehicles and campers, which creates a different visitor experience than is found at the primary sites for this project.
- The existing charcoal cooking stoves and fire pits present at this site are incompatible with the “cold camping” policy that is an integral part of this project.

Solstice Canyon Park (National Park Service)

- This alternative was considered and rejected in EIR Section 8.1.3.
- Habitat and vegetation types within Solstice Canyon are similar to the Proposed Project. Based upon a review of aerial imagery and knowledge of the site, implementation of a project at this location would have similar or greater impacts to ESHA within the coastal zone as that of the proposed project.
- Camping at this site would require the National Park Service to perform a National Environmental Policy Act review, and a Coastal Act Consistency Determination. (NPS Staff, June 2010)
- According to National Park Service staff, the site offers limited parking and is already at a “stretch carrying capacity.” (NPS Staff, June 2010)
- Public transportation to and from this site is inferior compared to the primary sites for this project.
- Beach access to and from this site is inferior compared to the primary sites for this project.
- The trail from the parking area runs through the middle of the only NPS-acceptable campsite within this park, which is located at the site of a burned-down building complex. This would provide a visitor nature experience vastly different than what is intended by this project.
- The former building site is intended to be preserved for historic interpretational services. (NPS Staff, June 2010)
- The site contains insufficient space for a camp host and campground.

Department of Water and Power (DWP) property adjacent to Corral Canyon Park

- This property has a land use designation and zoning of rural residential per the City’s certified LCP which does not allow camping.
- Habitat and vegetation types within DWP property are similar to the Proposed Project. Based upon a review of aerial imagery and knowledge of the site, implementation of a project at this location would have similar or greater

impacts to ESHA within the coastal zone as that of the proposed project.

- The potential campground at this site has no safe pedestrian footpath to the beach, due to a narrow right-of-way to Corral Canyon Road and a steep drop-off to Pacific Coast Highway.
- This site's proximity to public transportation is inferior to the primary sites for this project.

Dockweiler State Beach (operated by Los Angeles County)

- The existing overnight camping at this site is for Recreational Vehicles. There is no room for expansion, and no existing plan to create space for tent camping. (Per Los Angeles County Beaches and Harbors staff, June 2010)
- The site is not located within either the City of Malibu or the Malibu Coastal Zone.
- The site is not part of any existing trail system that connects to trails in the Malibu Coastal Zone.
- The site is a heavily used beach under the take-off path of Los Angeles International Airport, and is incapable of offering a visitor experience that even remotely resembles the experience intended by this project.

Further, please see Topical Response #1, along with Chapter 14 of the FEIR. The Modified Redesign Alternative would provide clustered camp sites primarily at only two park properties: Corral Canyon Park and Malibu Bluffs. The Proposed Project along with this alternative will be considered by the Conservancy/MRCA Boards.

Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.

Commenter 11: Don Cislo	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#11-1: Consider impacts to wild herons. Cold camping must be required—no smoking, no fires. Citizens arrests right should allowed to address illegal camping activity.	<p><i>Commenter asks that impacts to wild herons be considered, that cold camping be required, and that police power be provided to citizens to cite illegal camping activity.</i></p> <p>RESPONSE:</p> <p>Impacts to birds are addressed within Section 5.4, <i>Biological Resources</i>, specifically Impact BIO-7, BIO-8, BIO-9, and BIO-10. Mitigation Measures are required in order to avoid potentially significant impacts to all bird species, including wild herons.</p> <p>Consistent with the Fire Protection Plan, signage will be provided all trailhead and camping locations with emergency contact numbers listed; the reporting of any suspicious activity within the Plan area will be encouraged and all reports will be followed up. Please see Topical Response #1 and #2.</p> <p>Additionally, under the Modified Redesign Alternative’s Fire Protection Plan included in the FEIR, a strict cold camp policy prohibiting the use of propane stoves and other flame-emitting devices would be strictly enforced. The only approved cooking devices would be small electrical cooking appliances compatible with a park provided all-weather electrical outlet. Lastly, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp host, or staff maintenance person to strictly enforce this cold camp policy and further reduce any fire risk associated with the Plan. All MRCA rangers and camp hosts would be designated and trained as public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to strictly enforce the Plan cold camp policy. Please see Topical Response #1.</p>

	<p>Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.</p>
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Commenter 12: Steve Scheinkman	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
<p>#12-1: Avid camper/equestrian. Fire risk is real. The project will put people, homes and lives at risk due to fire. Concern is enforcement with no budget. Has never seen a ranger on a windy day; there is no posting of red-flag conditions currently. Not everybody is going to camp by the rules. People will light fires when they get lost. Why is MRCA/Conservancy risking the chance of increased fire? Use common sense.</p>	<p><i>This commenter expresses concerns related to Fire impacts and has concerns with respect to budgetary limitations in proving enforcement.</i></p> <p>RESPONSE:</p> <p>Please see Topical Response #2. A Fire Protection Plan (FPP) has been created for the entire project area, with individual plans prepared for each park site (see DEIR, <i>Appendix I</i>). DEIR, Section 5.6, <i>Fire Hazards</i>, speaks to impacts relating to Fire Hazards.</p> <p>The EIR acknowledges that it is the existing baseline condition that “given the climatic, vegetation, and topographic characteristics of the Plan area region, along with the fire history and fire behavior modeling results..., the Plan area is determined to be potentially vulnerable to wildfire starting in, burning onto, or spotting onto the site.”</p> <p>Restrictive policies have been outlined in the FPP to reduce the wildfire risk associated with the proposed project. The FPP provides details regarding site-specific policies and implementation measures that would govern these park areas with regards to fire protection. The FPP outlines a "systems approach" to fire prevention, protection, suppression, and emergency relocation to ensure proposed park improvements and uses will reduce potential risks associated with fire hazard. Important concepts included in this approach include pre-planning for emergency response, funded ongoing fuel modification, structural protection, water supply, access (ingress/egress), and fire shelters.</p>

For trails, through vegetation management, posting of fire danger information at trailheads, patrolling and strict enforcement of existing and proposed access and fire policies (as identified in the Fire Protection Plan), when compared to the existing baseline condition of the existing Plan area (where recreational access is already occurring, both legally and illegally) the likelihood of a lost hiker starting a camp or signal fire, which could get out of control, would be substantially diminished under the proposed FPP.

For campsites, each camp area will employ a host of Site Specific Fire Protection Measures, as identified in the Fire Protection Plan, including vegetation management to reduce fuels around campsites, having wildland fire-trained personnel on-site at all times when camping is permitted, having on-site wildland fire hydrants, etc. When compared to the existing baseline condition of the existing Plan area (where recreational access is already occurring, both legally and illegally) the likelihood of a campsite fire incident, which could get out of control, would be substantially diminished under the proposed FPP.

At times of year when trail use/ camping is not permitted and during red flag events, the campsites and trails will be regularly patrolled to ensure that unsanctioned use of the park sites is kept under strict control. When compared to the existing baseline condition of the existing Plan area (where recreational access is already occurring, both legally and illegally) the likelihood of a trail-side or campsite fire incident occurring at times of year when trail use/ camping is not permitted and during red flag events would be substantially diminished under the proposed FPP.

According to the MRCA Executive Director, enforcement of rules and regulations with respect to mitigating fire risk within the Plan area will be given the highest budgetary priority.

Further, the Conservancy/MRCA in developing the Modified Redesign Alternative, considered this fire risk concern and incorporated components into the alternative that would

reduce any fire risk. This alternative would limit camping to primarily two locations: Corral Canyon Park and Malibu Bluffs Conservancy Property. Both campsites would be clustered at each location to facilitate patrolling of each campsite. Additionally, both campsites are in close proximity to PCH to allow easy highway accessibility. Further, under the Fire Protection Plan for this alternative included in the FEIR, a strict cold camp policy prohibiting the use of propane stoves and other flame-emitting devices would be strictly enforced. The only approved cooking devices would be small electrical cooking appliances compatible with a park provided all-weather electrical outlet. Lastly, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp host, or staff maintenance person to strictly enforce this cold camp policy and further reduce any fire risk associated with the Plan. All MRCA rangers and camp hosts would be designated and trained as public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to strictly enforce the Plan cold camp policy. Please see Topical Response #1.

Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.

Commenter 13: Oral Comments - John Mazza, Malibu Planning Commission, Vice-Chair

Introduction

Pursuant to State CEQA Guideline 15088, proposed written responses shall be provided to all public agencies that commented on an EIR at least 10 days prior to the certification of any EIR. The Conservancy and MRCA provided all public agencies with proposed written responses to their comments on the DEIR at least 10 days prior to the certification of this FEIR. The version of all responses contained in this FEIR constitutes the final version as any previous version was a proposed response.

In response to both oral and written comments received on the Draft Environmental Impact Report (“DEIR”) for the Malibu Parks Public Access Enhancement Plan – Public Works Plan (the “Proposed Plan”) the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority (“Conservancy/MRCA”) has revised one of the alternatives detailed in the DEIR to create the Modified Redesign Alternative (“MRA”). In developing this MRA, the Conservancy/MRCA worked to refine the Redesign Alternative Plan contained in the DEIR to reduce all significant and unavoidable impacts to a level of insignificance. The Conservancy/MRCA also created the MRA to further reduce those impacts deemed insignificant (with or without mitigation) in the DEIR, but were of concern to the public. The intent was to make use of the comments received, and the analysis contained in the DEIR, to develop an alternative which was environmentally superior to the Proposed Plan analyzed in the DEIR. A detailed description of the MRA is provided in Appendix MRA-I in Volume IV of the Final Environmental Impact Report (“FEIR”) and a detailed analysis of the environmental consequences of the MRA is included in Volume IV of the FEIR which is scheduled to be released prior to the Conservancy/MRCA’s public hearing on the Plan.

Briefly, compared to the proposed Plan, the MRA

reduces the total number of campsites from 71 to 54, eliminates the Escondido Canyon Park and Latigo Trailhead campsites included in the Proposed Plan, and clusters the 54 campsites at primarily two parks: Corral Canyon Park (17 campsites) and Malibu Bluffs Conservancy Property (35 campsites). These two campsite locations have easy access to Pacific Coast Highway (PCH). In addition, under the MRA, two accessible campsites would be implemented at Ramirez Canyon Park in Phase 2. Phased roadway/ bridge improvements for enhanced access to Ramirez Canyon Road, Delaplane Road, and/or Via Acero are proposed, if required by the appropriate fire agency. Within each park containing campsites, the campsites would be clustered. For example, at Corral Canyon Park, the campsites would be eliminated along the creek and clustered along a bluff overlooking the Pacific Ocean. Clustering is intended to facilitate the oversight/management of the camp areas, result in lower operational costs, and maximizes the efficiency and effectiveness of fire protection and relocation efforts.

Under the MRA, day use facilities would be provided at Corral Canyon Park, the Malibu Bluffs Conservancy Property, Ramirez Canyon Park and Latigo Canyon. At Escondido Canyon Park the MRA includes only trail improvements to connect the proposed Coastal Slope Trail from Murphy Way to Latigo Trailhead.

Additionally, numerous project features have been added in the MRA to address the community's fire concerns. Under the MRA, for example, cooking would be limited to small electrical cook stations, and the use of flame-less cook-stoves and lanterns would be required. Further, a camp host, staff maintenance person, or Ranger, (all of whom would be wildland fire-trained), would be required to be onsite at park properties included in the MRA, during times when camping is permitted at the location.

The Final EIR includes an analysis of the MRA as well as a

	<p>MRA Fire Protection Plan. The responses to comments that follow address the comments on the DEIR and indicate where concerns raised by oral or written comments will be potentially eliminated or reduced with the adoption of this MRA.</p>
QUESTION/COMMENT	RESPONSE
<p>#13-1: Concerned with public safety and fire; citizens have asked for patrols. EIR states that 99% of fires are caused by humans. Has done work on trail connectivity—can't get from Latigo to Solstice Canyon w/ current access (e.g. at "Edge property"). Can connect trails to Westward Beach for camping. No objection to camping at a beach like Leo Carrillo, Westward. The 10,000-gal water tanks are not sufficient. 1983 fire not considered in the EIR. Wants trails and trail connections. Placement of several small camp areas over a large area is wrong approach. If a cigarette-induced fire can burn from PCH to the beach (Malibu Bluffs) within eight minutes, you need an evacuation plan, and not just for campers/hikers. Fire shelters are not accessible to the public. There is no access for trucks. Please consider the 2002 plan.</p>	<p><i>This commentor expresses concerns related to Fire impacts, trail connectivity, water tanks, fire history, evacuation for Malibu residents, fire shelters, and truck access.</i></p> <p>RESPONSE:</p> <p>Potential impacts related to wildfire are addressed within the FPP and the DEIR, Section 5.6, <i>Fire Hazards</i>. Water infrastructure is identified within the DEIR, Section 2.0, <i>Project Description</i>; municipal water supplies to fight most wildfires, with the 10,000-gallon waster storage tanks most often being utilized as a secondary back-up water supply.</p> <p>FPP includes relocation plans for all Plan visitors and staff; MRCA Rangers would train for and facilitate the relocation of persons from locations deemed unsafe to recreate at due to concerns related to threats of an on-coming fire.</p> <p>The City of Malibu and County of Los Angeles are responsible for notification and fire relocation for areas within their jurisdiction. As such, the City of Malibu has implemented the City's Emergency Preparedness program which was established to coordinate the City's response to disasters, such as fires, floods, earthquakes and storms. Under the City Manager's direction, the Emergency Services Coordinator is responsible for maintenance and implementation of the City's Emergency Operations Plan. This includes training of City staff and community volunteers, equipping and management of the Emergency Operations Center (EOC), overseeing the Community Emergency Response Team (CERT) and managing the City's emergency notification systems.</p>

The City of Malibu has also developed its own, specialized team of CERT volunteers. The team meets regularly at City Hall and trains to support the activities of the City's Emergency Operations Center (EOC), as well as to be available to support the volunteer needs of associated agencies, such as the Sheriff's and Fire Departments.

Further, the Conservancy/MRCA is the Western Sector Emergency Command Center for fire/disaster/public safety emergencies. As the command center, MRCA is equipped with full computer and radio dispatch capabilities in the event of any emergency.

Finally, in response to this comment and others, the Conservancy/MRCA will be presented with a Modified Redesign Alternative that would eliminate many concerns as they relate to fire risk. Specifically, the Modified Redesign Alternative includes in its Fire Protection Plan a limitation on all flammable cooking devices, including propane stoves and/or lights. The only allowed cooking devices in campsites would be those that operate on electricity and would be limited to small electric cooking devices. Further, as part of this alternative, permanent overnight accommodations for MRCA rangers is provided in campsites to ensure compliance with this cold camp policy. All MRCA rangers and camp hosts will be designated and trained as public officers under the provisions of the State Penal Code and would be able to strictly enforce this cold camp policy. Lastly, camping under this alternative is limited to two areas with immediate access to PCH, the Corral Canyon Park and the Malibu Bluffs Conservancy Property. Proximity to PCH will facilitate access to highways in the event of a fire event.

In consideration of the discussion above, no further revisions to the DEIR would be required.

Commenter 14: Julie Hoffman	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
<p>#14-1: Never seen a ranger on trails from Puerco Canyon to Corral. Who watches out for the bees and mountain lions? Dog-walkers are problematic—nobody responds to complaints and bite incidents (associated with professional dog walkers). Fire jumps canyon and there’s no way out. Concern about propane explosion at RV Park and at gas station should fire reach these locations.</p>	<p><i>This commenter expresses concerns related to ranger patrols and fire.</i></p> <p>RESPONSE:</p> <p>The MRCA manages and provides ranger services for about 60,000 acres of public lands and parks and provides comprehensive education and interpretation programs for the public. The MRCA also provides natural resource and scientific expertise, critical regional planning services, park construction services, park operations, fire prevention, ranger services, educational, and leadership programs for thousands of youth each year.</p> <p>MRCA provides a number of fire protection resources and features that are currently available and implemented at the Parks. The resources available include 103 trained wildland firefighters and MRCA wildland fire fighting apparatus, which include one four-wheel drive Type 2 fire engine, one four-wheel drive Type 3 engine, one Type 3 engine, one water tender, two mobile command units, 30+ chainsaws, and eight four-wheel drive fire patrol vehicles equipped with a minimum of 200 gallons of water. Please see Topical Response #2.</p> <p>MRCA also currently employs twenty-two (22) Park Rangers that implement the MRCA ordinance (see <i>Appendix P</i>) which includes MRCA park rules and regulations. MRCA Park Rangers are California Peace Officers with authority to issue citations and make arrests for violation of MRCA rules and regulations, local ordinance, and State law. Park Rangers provide routine patrols, enforcement action, and public safety. The Park Rangers conduct periodic patrols of MRCA parks from</p>

approximately 6:00 a.m. to 1:00 a.m. seven days a week, with the exception of red flag days, when Park Ranger patrols are increased to 24 hours a day. Park Ranger patrols are conducted on foot, 4-wheel drive vehicle, equestrian, and/or on mountain bikes.

Based upon the above discussion and the analysis contained within the DEIR, the Conservancy/MRCA Staff have determined that day use and overnight camping areas would be adequately supervised and managed to respond to bee/ mountain lion sightings as well to address dog bite incidents and more serious calls related to potential wildfire threats.

Further, the Conservancy/MRCA in developing the Modified Redesign Alternative, considered this fire risk concern and incorporated components into the alternative that would reduce any fire risk. This alternative would limit camping to primarily two locations: Corral Canyon Park and Malibu Bluffs Conservancy Property. Both campsites would be clustered at each location to facilitate patrolling of each campsite. Additionally, both campsites are in close proximity to PCH to allow easy highway accessibility. Further, under the Fire Protection Plan for this alternative included in the FEIR, a strict cold camp policy prohibiting the use of propane stoves and other flame-emitting devices would be strictly enforced. The only approved cooking devices would be small electrical cooking appliances compatible with a park provided all-weather electrical outlet. Lastly, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp host, or staff maintenance person to strictly enforce this cold camp policy and further reduce any fire risk associated with the Plan. All MRCA rangers and camp hosts would be designated and trained as public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to strictly enforce the Plan cold camp policy. Please see Topical Response #1.

This comment does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR. Please note that

	the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.
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Commenter 15: Judy Villablanca, Winding Way – Murphy Way HOA, President	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
<p>#15-1: Escondido Canyon Park has hosted 100's of people/day b/c of waterfalls. The project has significant disturbance and grading. No on-site mitigation being done here, instead elsewhere—why? Has concerns about nighttime noise and lights at Escondido. SCE is trying to underline powerlines at Escondido; Conservancy is in discussion w/ SCE and is opposing that project—this affects ESHA and has impacts to frogs. Trails, day-use, ADA-accessible parking are reasonable uses at Escondido. Waterfalls are not publicly owned at Escondido, but area is being degraded. Emergency evacuation is a concern. Need signage and docents to prevent misuse of resources. Water quality needs to be checked downstream at Escondido due to increased use. Need to have a road-side trail, not in the middle of the road.</p>	<p><i>This commenter expresses a number of concerns related to grading, mitigation, noise, lighting, biology, water quality, fire, and alternatives within Escondido Canyon.</i></p> <p>RESPONSE:</p> <p>This comment identifies a number of environmental concerns regarding the Plan's use of Escondido Canyon, with an indication that trails, day-use, and ADA accessible parking would be acceptable uses at Escondido Canyon Park (ECP). A Modified Redesign Alternative is being proposed for consideration, which would eliminate and/or reduce impacts related to grading, noise, lighting, biology, water quality, and fire at ECP due to the removal of both the camping and trailhead facilities at ECP. Limited trail improvements would continue to be proposed at ECP. Please see Topical Response #1 and Chapters 14 and 15 of the FEIR.</p>

Agrees w/ fire risk issues. Project needs better alternatives.	
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Commenter 16: Lucile Keller, Malibu Township Council	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
<p>#16-1: Needs commitment on ranger services, schedule and duration. How often will 71 campsites be visited? Page 2-51: no guarantee of camp hosts or patrols. NPS survey shows availability of 1,300 sites per night—add'l camping is not needed. There is a reference to State Funds but not to the responsible Agency notified(?). There is no notification / fire evacuation plans for the community addressed in plan. Plan violates Coastal Act due to fire hazards. Campsites are located in an extreme fire hazards. Campers are allowed to use propane lanterns and stoves—there is a fire risk if apparatus are dropped. How will walk-in campers know the rules? 99% of fires are caused by humans.</p>	<p><i>This commenter expresses a number of concerns related to patrolling, resident evacuation, fire, and consistency with the Coastal Act. The commentor also questions the need for additional camping.</i></p> <p>RESPONSE:</p> <p>Plan consistency with the Coastal Act will be determined by the Conservancy/ MRCA Boards, and ultimately, the Coastal Commission; a related analysis of this issue area is included within the Draft EIR, Section 4.0, <i>Consistency with Plans and Policies</i> section. Any inconsistencies with Coastal Act policies are identified within the <i>Land Use and Planning</i> impact analysis (Section 5.11).</p> <p>Please see responses to comments 13-1 and 14-1 for a discussion of patrolling and resident evacuation.</p> <p>This comment identifies an environmental concern with respect to the use of propane lanterns or stoves. Based on this concern, a Modified Redesign Alternative is being considered for adoption that addresses this fire risk concern and incorporates components into the alternative that would reduce any fire risk. This alternative would limit camping to primarily two locations: Corral Canyon Park and Malibu Bluffs Conservancy Property. Both campsites would be clustered at each location to facilitate patrolling of each campsite. Additionally, both campsites are in close proximity to PCH to allow easy highway accessibility. Further, under the Fire Protection Plan for this alternative included in the FEIR, a strict cold camp policy prohibiting the use of propane stoves and other flame-emitting devices would be strictly enforced. The only approved cooking devices would be small electrical</p>

	<p>cooking appliances compatible with a park provided all-weather electrical outlet. Lastly, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp host, or staff maintenance person to strictly enforce this cold camp policy and further reduce any fire risk associated with the Plan. All MRCA rangers and camp hosts would be designated and trained as public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to strictly enforce the Plan cold camp policy. Please see Topical Response # 1 and #2.</p>
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Commenter 17: Vit Petrusis	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#17-1: Parking along PCH can be expanded. Winding Way East is a private road as is the water line within it—it was paid for by the owners. Trail maintenance is poor. Parking lot will be in ESHA. No objection to parking at PCH or hiking trails. 99% of fires are caused by humans.	<p><i>This commenter expresses concerns related to parking, trail maintenance, and fire.</i></p> <p>RESPONSE:</p> <p>Please see Topical Response #1. Under the Modified Redesign Alternative (MRA), parking areas proposed along Kanan Dume Road would be reduced in size. Additionally, the proposed parking would be removed from the Escondido Canyon Park property, along with proposed camp sites. Overall, the number of camp sites would be reduced under the MRA, as compared to the Proposed Plan, thereby reducing parking demands and the number of parking spaces needed to meet demands.</p> <p>This comment does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p>

Commenter 18: Daniel M. Cislo	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#18-1: Likes trails and hiking. Foolish to put parking/ camping in Escondido Canyon. There is only an easement for hiking. Deer and birds are there only b/c meadow is there. No on-site mitigation for Escondido Canyon is disappointing. Revisit the No Project Alternative. Why spending the money to make accessible and plow over with budget issues?	<p><i>This commenter expresses concerns related to Escondido Canyon and suggests that the No Project Alternative be revisited in light of budgetary issues.</i></p> <p>RESPONSE:</p> <p>See response to comment 15-1 and Topical Response #1. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p>

Commenter 19: Bill Rhodes, Malibu Road Property Owners Association, President	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#19-1: Has same questions about fire raised by others. Concerned with supervision. Not opposed to public use, but has safety concerns. Would be willing to consider consolidated camping facilities at Malibu Bluffs near John Tyler—will submit a comment letter later. Wants a resolution that meets everyone’s needs. Safety is the primary concern.	<p><i>This commenter expresses concerns related to fire and indicate support for consolidated camping facilities at Malibu Bluffs.</i></p> <p>RESPONSE:</p> <p>This comment does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p> <p>Please note that a Modified Redesign Alternative is being proposed for consideration, which would reduce camping at Ramirez Canyon Park and eliminated camping at Escondido Canyon Park, and Latigo Trailhead, while clustering campsites in locations along PCH at Corral Canyon Park and Malibu Bluffs Conservancy Property; two reservation-only accessible sites would be provided at Ramirez Canyon Park. The clustering would allow for increased and enhanced supervision of the camp areas by wild-fire trained rangers and/or camp hosts and better visibility by the public (who may report any suspicious activity), while also allowing for ease of evacuation to PCH as well as for easy fire fighter access from PCH. Please see Topical Response #1 and #2.</p>

Committer 20: Dixie Moore	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#20-1: Driveway located off Latigo (Wilmott Lane) is listed as trail; it is private property. Against camping at Latigo because of fire/slide risk. Project has impact to a blueline stream at this location. Camping should be at Decker—106 campsites and City of L.A. wants to sell. Also, Topanga Motel could be another alternative location for camping.	<p><i>This commenter expresses concerns related to trail ownership and camping at Latigo and suggests potential alternative camping locations.</i></p> <p>RESPONSE:</p> <p>Consistent with Section 2.3.3 (Trail Improvements) of the DEIR Project Description, any trails proposed within the Plan not currently under Conservancy/MRCA ownership would need to be acquired.</p> <p>This comment identifies environmental concerns related to geology, fire risk and biology with respect to the use of Latigo Trailhead for camping. A Modified Redesign Alternative (MRA) is being proposed for consideration, which would eliminate and/or reduce impacts related to landslide risk and fire risk. The MRA would eliminate camping at Latigo Trailhead, reduce the number of parking spaces provided, and only allow use of the site for limited day-use/ picnic activities. Please see Topical Response #1 and #2. Please see Section 5.4 of the DEIR and Section 14 of the FEIR which specify the biological resource mitigation measures specified for the Proposed Plan and MRA, respectfully, to ensure that impacts to blueline streams would be less than significant.</p>

Commenter 21: Oral Comments - John Sibert, City of Malibu, City Councilperson

Introduction

Pursuant to State CEQA Guideline 15088, proposed written responses shall be provided to all public agencies that commented on an EIR at least 10 days prior to the certification of any EIR. The Conservancy and MRCA provided all public agencies with proposed written responses to their comments on the DEIR at least 10 days prior to the certification of this FEIR. The version of all responses contained in this FEIR constitutes the final version as any previous version was a proposed response.

In response to both oral and written comments received on the Draft Environmental Impact Report (“DEIR”) for the Malibu Parks Public Access Enhancement Plan – Public Works Plan (the “Proposed Plan”) the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority (“Conservancy/MRCA”) has revised one of the alternatives detailed in the DEIR to create the Modified Redesign Alternative (“MRA”). In developing this MRA, the Conservancy/MRCA worked to refine the Redesign Alternative Plan contained in the DEIR to reduce all significant and unavoidable impacts to a level of insignificance. The Conservancy/MRCA also created the MRA to further reduce those impacts deemed insignificant (with or without mitigation) in the DEIR, but were of concern to the public. The intent was to make use of the comments received, and the analysis contained in the DEIR, to develop an alternative which was environmentally superior to the Proposed Plan analyzed in the DEIR. A detailed description of the MRA is provided in Appendix MRA-I in Volume IV of the Final Environmental Impact Report (“FEIR”) and a detailed analysis of the environmental consequences of the MRA is included in Volume IV of the FEIR which is scheduled to be released prior to the Conservancy/MRCA’s public hearing on the Plan.

Briefly, compared to the proposed Plan, the MRA

reduces the total number of campsites from 71 to 54, eliminates the Escondido Canyon Park and Latigo Trailhead campsites included in the Proposed Plan, and clusters the 54 campsites at primarily two parks: Corral Canyon Park (17 campsites) and Malibu Bluffs Conservancy Property (35 campsites). These two campsite locations have easy access to Pacific Coast Highway (PCH). In addition, under the MRA, two accessible campsites would be implemented at Ramirez Canyon Park in Phase 2. Phased roadway/ bridge improvements for enhanced access to Ramirez Canyon Road, Delaplane Road, and/or Via Acero are proposed, if required by the appropriate fire agency. Within each park containing campsites, the campsites would be clustered. For example, at Corral Canyon Park, the campsites would be eliminated along the creek and clustered along a bluff overlooking the Pacific Ocean. Clustering is intended to facilitate the oversight/management of the camp areas, result in lower operational costs, and maximizes the efficiency and effectiveness of fire protection and relocation efforts.

Under the MRA, day use facilities would be provided at Corral Canyon Park, the Malibu Bluffs Conservancy Property, Ramirez Canyon Park and Latigo Canyon. At Escondido Canyon Park the MRA includes only trail improvements to connect the proposed Coastal Slope Trail from Murphy Way to Latigo Trailhead.

Additionally, numerous project features have been added in the MRA to address the community's fire concerns. Under the MRA, for example, cooking would be limited to small electrical cook stations, and the use of flame-less cook-stoves and lanterns would be required. Further, a camp host, staff maintenance person, or Ranger, (all of whom would be wildland fire-trained), would be required to be onsite at park properties included in the MRA, during times when camping is permitted at the location.

The Final EIR includes an analysis of the MRA as well as a

	<p>MRA Fire Protection Plan. The responses to comments that follow address the comments on the DEIR and indicate where concerns raised by oral or written comments will be potentially eliminated or reduced with the adoption of this MRA.</p>
QUESTION/COMMENT	RESPONSE
<p>#21-1: Concern is public safety/ fires. Biggest problem is cigarette smoking. Having someone around to monitor helps but doesn't solve the problem. Hike-in camps are especially dangerous. Litigation is not the answer.</p>	<p><i>This commentor expresses fire concerns related to cigarette smoking at remote and isolated hike-in camps.</i></p> <p>RESPONSE:</p> <p>This comment does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process. Further CEQA does not require that the scope of an EIR be exhaustive. See CEQA Guideline 15151. As such, the scope of environmental analysis in the DEIR and FEIR that did an extensive fire analysis is adequate for purposes of CEQA.</p> <p>Nevertheless, as noted above, in an effort to be responsive to this comment and others, the Conservancy/MRCA will be presented with a Modified Redesign Alternative. Under this alternative, a camp host, staff maintenance person, or Ranger, (all of whom would be wildland fire-trained), would be required to be onsite at park properties included in the MRA, during times when camping is permitted at the location. Permanent overnight accommodations for this purpose are included in the Modified Redesign Alternative Plan to facilitate patrolling at all times camping is permitted. All MRCA rangers and camp hosts will be designated and trained as public officers under the provisions of the State Penal Code and would be able to strictly enforce all policies.</p>

Commenter 22: Oral Comments - Jefferson Wagner, City of Malibu, Mayor Pro-Tem	
<i>Introduction</i>	<p><i>Pursuant to State CEQA Guideline 15088, proposed written responses shall be provided to all public agencies that commented on an EIR at least 10 days prior to the certification of any EIR. The Conservancy and MRCA provided all public agencies with proposed written responses to their comments on the DEIR at least 10 days prior to the certification of this FEIR. The version of all responses contained in this FEIR constitutes the final version as any previous version was a proposed response.</i></p> <p>In response to both oral and written comments received on the Draft Environmental Impact Report (“DEIR”) for the Malibu Parks Public Access Enhancement Plan – Public Works Plan (the “Proposed Plan”) the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority (“Conservancy/MRCA”) has revised one of the alternatives detailed in the DEIR to create the Modified Redesign Alternative (“MRA”). In developing this MRA, the Conservancy/MRCA worked to refine the Redesign Alternative Plan contained in the DEIR to reduce all significant and unavoidable impacts to a level of insignificance. The Conservancy/MRCA also created the MRA to further reduce those impacts deemed insignificant (with or without mitigation) in the DEIR, but were of concern to the public. The intent was to make use of the comments received, and the analysis contained in the DEIR, to develop an alternative which was environmentally superior to the Proposed Plan analyzed in the DEIR. A detailed description of the MRA is provided in Appendix MRA-I in Volume IV of the Final Environmental Impact Report (“FEIR”) and a detailed analysis of the environmental consequences of the MRA is included in Volume IV of the FEIR which is scheduled to be released prior to the Conservancy/MRCA’s public hearing on the Plan.</p> <p>Briefly, compared to the proposed Plan, the MRA</p>

reduces the total number of campsites from 71 to 54, eliminates the Escondido Canyon Park and Latigo Trailhead campsites included in the Proposed Plan, and clusters the 54 campsites at primarily two parks: Corral Canyon Park (17 campsites) and Malibu Bluffs Conservancy Property (35 campsites). These two campsite locations have easy access to Pacific Coast Highway (PCH). In addition, under the MRA, two accessible campsites would be implemented at Ramirez Canyon Park in Phase 2. Phased roadway/ bridge improvements for enhanced access to Ramirez Canyon Road, Delaplane Road, and/or Via Acero are proposed, if required by the appropriate fire agency. Within each park containing campsites, the campsites would be clustered. For example, at Corral Canyon Park, the campsites would be eliminated along the creek and clustered along a bluff overlooking the Pacific Ocean. Clustering is intended to facilitate the oversight/management of the camp areas, result in lower operational costs, and maximizes the efficiency and effectiveness of fire protection and relocation efforts.

Under the MRA, day use facilities would be provided at Corral Canyon Park, the Malibu Bluffs Conservancy Property, Ramirez Canyon Park and Latigo Canyon. At Escondido Canyon Park the MRA includes only trail improvements to connect the proposed Coastal Slope Trail from Murphy Way to Latigo Trailhead.

Additionally, numerous project features have been added in the MRA to address the community's fire concerns. Under the MRA, for example, cooking would be limited to small electrical cook stations, and the use of flame-less cook-stoves and lanterns would be required. Further, a camp host, staff maintenance person, or Ranger, (all of whom would be wildland fire-trained), would be required to be onsite at park properties included in the MRA, during times when camping is permitted at the location.

The Final EIR includes an analysis of the MRA as well as a

	<p>MRA Fire Protection Plan. The responses to comments that follow address the comments on the DEIR and indicate where concerns raised by oral or written comments will be potentially eliminated or reduced with the adoption of this MRA.</p>
QUESTION/COMMENT	RESPONSE
<p>#22-1: Fuel modification is not understood by most people. This issue needs to be considered in-depth.</p>	<p><i>This commentor expresses an interest in seeing fuel modification be considered in-depth.</i></p> <p>RESPONSE:</p> <p>This comment does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p> <p>Fuel modification requirements are identified within the FPP and are evaluated within the context of the DEIR's impact analysis.</p> <p>With respect to the fuel modification issue, as a result of comments received from LACFD during circulation of the DEIR and subsequent communication with them, a new Modified Redesign Alternative is being proposed for consideration, which would provide greater fuel modification buffers to proposed Plan facilities in order to lessen fire risk. Further, the Modified Redesign Alternative would eliminate camping at Escondido Canyon Park, Latigo Trailhead, reduce the number of parking spaces provided, and only allow use of the site for limited day-use/ picnic activities. The reader is directed to the Fire Safety (Fuel Modification and Vegetation Management) section of the Modified Redesign Alternative Project Description.</p>

Commenter 23: Ari David, Malibu Road Owners Association	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#23-1: Fire exposure/ risk is huge. Against camping without safety for residents/ campers. Supports camping at the beach.	<p><i>This commenter expresses concerns with respect to camping and fire.</i></p> <p>RESPONSE:</p> <p>Please see Topical Response #2. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p> <p>Please especially note response to comment 19-1.</p>

Commenter 24: Paul Morra, Corral Canyon Fire Safety Alliance, President	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#24-I: EIR doesn't address weather, should consider 90 mph wind gusts. Concern is public safety/ fire. It took 20 minutes to respond to the most recent fire. Fire at Corral(?) would block the only way out. Supports trail expansion, not camping.	<p><i>This commenter expresses concerns with respect to weather and fire safety, as well as evacuation for Corral Canyon.</i></p> <p>RESPONSE:</p> <p>Fire behavior modeling was conducted as part of the DEIR to document the type and intensity of fire that would be expected in the Plan area, given characteristic features including topography, vegetation, and weather. Fire behavior models prepared for the Fire Protection Plans were based on existing site conditions. Fire behavior modeling conducted for the Plan area includes a high level of detail and analysis which results in reasonably accurate representations of how wildfire may move through available fuels. Weather data used for fire behavior modeling were collected from local Remote Automated Weather Stations using Fire Family Plus. These wind speeds were adjusted to midflame wind speed through a conservative correction factor to mimic actual wind speeds in the flaming front. Wind speeds higher than those used for modeling purposes, such as those that may occur within Corral Canyon, will effect fire behavior, mostly by increasing the rate of spread, but also have a tendency to lay the flame front over, more parallel with the ground. Rate of spread is important for determining how fast a fire will travel from ignition source to down-wind areas. However, regardless of the rate of spread, camping will be prohibited on days where sustained wind or gusts are occurring at levels well below those cited by the commenter.</p> <p>On-shore flows that pose a threat in Corral Canyon are noted. However, Red Flag Warnings for this area, according to the 2009 California Fire Weather Annual Operating Plan, would</p>

include days where humidity is equal to or less than 15% and wind is greater than or equal to 25 mph sustained or gusting to 35 mph. As suggested, humidity plays a very large role in fire spread rates. On-shore flow will typically include higher humidity and correspondingly lower likelihood of ignitions and slower fire spread rates. That does not preclude the possibility that fire can ignite and spread during these on-shore events. However, it is situations like this that have lead to the Los Angeles County Fire Department to potentially require "last resort" fire shelters at these camp locations. Should a fire ignite when there is an on-shore flow and occur to the west of the camps, prohibiting evacuation/relocation to the west, campers would temporarily shelter in the provided structures while the fire front passed, then evacuate to the west via Corral Canyon Road, as directed by fire officials/law enforcement. Please see Topical Response #2.

Additionally, a Modified Redesign Alternative is being considered for adoption that addresses this fire risk concern and incorporates components into the alternative that would reduce any fire risk. Under this alternative, a strict cold camp policy prohibiting the use of propane stoves and other flame-emitting devices would be strictly enforced. The only approved cooking devices would be small electrical cooking appliances compatible with a park provided all-weather electrical outlet. Lastly, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp host, or staff maintenance person to strictly enforce this cold camp policy and further reduce any fire risk associated with the Plan. All MRCA rangers and camp hosts would be designated and trained as public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to strictly enforce the Plan cold camp policy. Please see Topical Response #1.

Please see response to comment 13-1 for information/discussion related to non-Plan related residential evacuation responsibilities and procedures.

Commenter 25: Sonia Ottusch	
<i>Introduction</i>	In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative & Topical Response #2 – Fire Concerns). Where a response to a comment can be addressed with one of these topical responses, the commenter is referred to the topical response.
QUESTION/COMMENT	RESPONSE
#25-1: Volunteers for the Mountain Bike Unit, which patrols local trails. Experience has shown that at every park, people break rules regularly. Regardless of what rules are adopted to address fire concerns, there will not be enough patrols to enforce the rules.	<p><i>This commenter expresses concerns with respect to patrolling and the propensity of people to break the rules.</i></p> <p>RESPONSE:</p> <p>Please see responses to comments 13-1 and 14-1 for a discussion of patrolling and resident evacuation.</p> <p>Additionally, under the Modified Redesign Alternative, provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp host, or staff maintenance person to would be constructed to ensure campsites are patrolled when camping is permitted. All MRCA rangers and camp hosts would be designated and trained as public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to strictly enforce all policies. Please see Topical Response # 1 and #2.</p> <p>This comment does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p>