

### **16.3 Response to Written Comments**

Table 16-2 identifies the list of those public agencies, organizations (e.g., professional associations, citizen groups), and individuals (e.g., private individuals and businesses) who provided comment on the Public Draft EIR. The comment letters are presented, in general, in the order of the date on which the letter was received by the EIR consultant.

**Table 16-2  
Commenters on the Draft EIR**

<b>Letter Code</b>	<b>Individual/Agency</b>	<b>Dated</b>
<b>A</b>	Steve Ryan	2/21/2010
<b>B</b>	Marshall Thompson	2/22/2010
<b>C</b>	Ruth Staub	2/22/2010
<b>D</b>	Sal and Barbara Fish	2/23/2010
<b>E</b>	Ken Heller	2/27/2010
<b>F</b>	John Tindall	3/01/2010
<b>G</b>	Gregg Beytin	3/09/2010
<b>H</b>	Marian Hall	3/12/2010
<b>I</b>	Scott Harris California Department of Fish and Game Habitat Conservation Planning	3/16/2010
<b>J</b>	Julie Yom County of Los Angeles Department of Parks and Recreation	3/17/2010
<b>K</b>	Jackie Robbins	3/18/2010
<b>L</b>	Laura Rosenthal City of Malibu Public Works Commissioner	3/18/2010
<b>M</b>	Robert Schilling	3/18/2010
<b>N</b>	Dennis Seider Parker Shumaker Mills, LLC	3/19/2010
<b>O</b>	William J. McCarthy and Bambi B. Young	3/19/2010
<b>P</b>	Donna Williams	3/20/2010
<b>Q</b>	Steve Poswillo	3/20/2010

**Table 16-2**  
**Commenters on the Draft EIR**

<b>Letter Code</b>	<b>Individual/Agency</b>	<b>Dated</b>
<b>R</b>	Derek Tabak	3/20/2010
<b>S</b>	Michael Manheim and Janus Cercone	3/21/2010
<b>T</b>	Brian Weiss	3/21/2010
<b>U</b>	E. Berry Haldeman	3/22/2010
<b>V</b>	A.J., Peter, Hollie and Spencer Steinberg	3/22/2010
<b>W</b>	Yvette Land-Enczig	3/22/2010
<b>X</b>	Sharon F. Klinger	3/22/2010
<b>Y</b>	Jennifer Grossman	3/22/2010
<b>Z</b>	Sam Schuchat Executive Officer, California State Coastal Conservancy	3/18/2010
<b>AA</b>	Judi Pace	3/22/2010
<b>BB</b>	Ted Fulton	3/22/2010
<b>CC</b>	Sheryl Sher & Howard Sher	3/22/2010
<b>DD</b>	Lucile Keller Secretary, Malibu Township Council	3/22/2010
<b>EE</b>	Shelley Luce D. Env, Executive Director, Santa Monica Bay Restoration Commission	3/22/2010
<b>FF</b>	Corral Canyon Fire Safety Alliance	3/22/2010
<b>GG</b>	City of Malibu	3/22/2010
<b>HH</b>	Susan Tillum	3/22/2010
<b>II</b>	G. Greg Aftergood Malibu Road Association	3/22/2010
<b>JJ</b>	Scott Tallal	3/22/2010
<b>KK</b>	Julie Hoffman	3/22/2010
<b>LL</b>	James Repking Winding Way Murphy Way Home and Landowners Association, represented by Cox, Castle & Nicholson LLC	3/22/2010

**Table 16-2  
Commenters on the Draft EIR**

<b>Letter Code</b>	<b>Individual/Agency</b>	<b>Dated</b>
<b>MM</b>	Gary Hoffman	3/22/2010
<b>NN</b>	Greg Even Los Angeles County Waterworks Districts Los Angeles County Department of Public Works	3/22/2010
<b>OO</b>	Suzanne Somers and Alan Hamel	3/22/2010
<b>PP</b>	Victoria Hand	3/22/2010
<b>QQ</b>	Rhiannon Bailard Assistant Vice President, Pepperdine University	3/22/2010
<b>RR</b>	Dolores Rivellino Walsh	3/22/2010
<b>SS</b>	Stephen Polk	3/23/2010
<b>TT</b>	Scott Morgan Acting Director, State Clearinghouse	3/24/2010
<b>UU</b>	Gerald R. Zimmerman Executive Director, Colorado River Board of California	2/24/2010
<b>VV</b>	Gail Farber County of Los Angeles Department of Public Works	3/25/2010
<b>WW</b>	James G. Bailey Head Fire Prevention Engineering, County of Los Angeles Fire Department	3/18/2010
<b>XX</b>	Elmer Alvarez IGR/CEQA Branch Chief, Caltrans	3/26/2010
<b>YY</b>	Steven A. Amerikaner Brownstein Hyatt Farber Schreck	3/22/2010
<b>ZZ</b>	Ruth and Dennis Marsden	3/22/2010
<b>AAA</b>	Sandra Albers Conservation Biologist, Resource Conservation District of the Santa Monica Mountains	3/29/2010
<b>BBB</b>	Robert Garcia Executive Director and Counsel, The City Project	4/05/2010
<b>CCC</b>	Deanna Christensen Coastal Program Analyst, California Coastal	4/13/2010

**Table 16-2**  
**Commenters on the Draft EIR**

<b>Letter Code</b>	<b>Individual/Agency</b>	<b>Dated</b>
<b>DDD</b>	Commission John R. Todd Chief, Forestry Division Prevention Services Bureau Los Angeles County Fire Department	4/21/2010

**From:** A-FibFriendSteve [mailto:afibfriend@verizon.net]  
**Sent:** Sunday, February 21, 2010 5:06 PM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** Overnight camping

Malibu is very fire prone. Have you ever been in a Malibu fire? Fire embers rain down everywhere. A wall of fire attacks you driven by raging Santa Ana winds. Our house was a burn out before we bought it. One fire came within 400 yards of our home before the wind shifted.

A-1

If people stay overnight, they will certainly make fires for warmth and for cooking using butane stoves, rock pits, wood fires from branches, etc. Ask any park ranger about this. There are very few park rangers in Malibu who can't be expected to police adequately overnight camping sites. They are stretched very thin as it is.

A-2

People can enjoy the beautiful beaches and parks of Malibu without having to camp overnight. Thousands do. Malibu is easily accessible for most people without having to camp overnight.

A-3

Fires started in areas you suggest for overnight camping can be particularly devastating for Malibu. These overnight camping sites are situated near residential areas of Malibu. They would destroy many homes and kill many people before the fire department would have time to protect them.

A-4

One recent devastating fire in Malibu was started by an illegal night-time fire in a park area. These fires can be devastating and unstoppable. Simply posting a sign "No Fires Allowed" will certainly not stop people from setting up fires, as you well know. You don't have any effective safeguards or policing built into your overnight camping policy to realistically prevent people from making fires.

(Do you have a grudge against people who live in Malibu? Why cause us so much unnecessary risk?)

A-5

Steve Ryan

<p><b>Letter A</b>  <b>Commenter: Steve Ryan</b>  <b>Date: February 21, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>A-1</p>	<p><i>This comment states that Malibu is very prone to fire.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p> <p>Please see Section 5.6, <i>Fire Hazards</i>, of the DEIR which includes a description of existing conditions, and Topical Response #2.</p>
<p>A-2</p>	<p><i>This comment states that if people stay overnight they will certainly make fires for warmth and for cooking using butane stoves, rock pits, wood fires from branches, etc., and questions the ability of limited MRCA Park Rangers to adequately police overnight camping areas to enforce the “no fire” policy.</i></p> <p>RESPONSE:</p> <p>Please see Topical Response #2.</p>
<p>A-3</p>	<p><i>This comment states that people can enjoy the Malibu beaches and parks without having to camp overnight.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.”</p>

	<p>This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA's decision-making body.</p>
A-4	<p><i>This comment expresses concern with locating overnight camping near residential areas and questions the Plan's overnight camping policies to effectively safeguard or police the park areas to prevent people from building fires.</i></p> <p>RESPONSE:</p> <p>Please see Topical Response #2.</p> <p>Based upon the above discussion, no revision of the DEIR would be required.</p>
A-5	<p><i>This comment asks if the Conservancy has a grudge against the residents of Malibu.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the "lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response." This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA's decision-making body.</p> <p>Please, also, see Topical Response #2.</p>

**From:** Marshall Thompson [mailto:marshall@prvideo.tv]  
**Sent:** Monday, February 22, 2010 6:53 PM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** Santa Monica Mountains Conservancy re: the draft environmental report for the overnight camping proposal.

Dear Joe,

It is absurd that the Conservancy is the same agency that will pass judgment on their own EIR. It comes as no surprise that you passed your own rigorous inspection with flying colors. Well done, sir! You would do well in an Orwellian universe. Why you insist on tainting your own otherwise fine legacy with a grudge match against Malibu residents legitimately concerned about increased fire danger in our tinder dry canyons is difficult to imagine or understand. I frequent many of our fine local parks and the scarcity of uniformed supervision is appalling. I simply feel you in the guise of the Conservancy should not possess or develop that which you cannot adequately protect or supervise. Where were you when the lost hikers started a fire last week? Asleep in the Palisades where you belong.

| B-1

| B-2

| B-3

| B-4

**Marshall Thompson**  
**5782 Calpine Drive**  
**Malibu, CA 90265**  
**310-403-2507**

<p><b>Letter</b>      <b>B</b>  <b>Commenter:</b> <b>Marshall Thompson</b>  <b>Date:</b> <b>February 22, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>B-1</p>	<p><i>This comment expresses concern with the Conservancy being the entity that would approve the EIR.</i></p> <p>RESPONSE:</p> <p>The Conservancy/MRCA are the co-Lead Agencies consistent with CEQA Guidelines 15051(d). The Conservancy/MRCA have the primary responsibility for carrying out, funding and approving the proposed project, including preparation of the appropriate environmental document. Similar to any City or County sponsored project, the City and/or County would be the designated Lead Agency with the responsibility for carrying out, funding and approving their project and any required environmental documentation. Furthermore, the EIR must include and incorporate responsible agency comments on the adequacy of the EIR. Responsible agencies are those public agencies, other than the Lead Agency, which may have responsibility for carrying out or approving a portion of the project.</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
<p>B-2</p>	<p><i>This comment asks why the Conservancy would taint their own fine legacy with a grudge match against the residents of Malibu who are legitimately concerned about increased fire danger.</i></p> <p>RESPONSE:</p>

	<p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Please, also, see Topical Response #2.</p>
<p>B-3</p>	<p><i>This comment questions the ability of the Conservancy to adequately protect and supervise land under their control.</i></p> <p>RESPONSE:</p> <p>The Santa Monica Mountains Conservancy was established by the California State Legislature in 1980. Since that time, the Conservancy has helped to preserve over 60,000 acres of parkland in both wilderness and urban settings, and has improved more than 114 public recreational facilities throughout Southern California. In addition, the Conservancy has given grants to nonprofit organizations for outdoor and environmental educational and interpretation programs that have served hundreds of thousands of children and other park visitors.</p> <p>MRCA is a local government public entity established in 1985 pursuant to the Joint Exercise of Powers Act (Government Code Section 6500 <i>et seq.</i>) consisting of a partnership between the Conservancy and the Conejo and Rancho Simi Recreation and Park Districts, which are local park agencies established by the vote of the people in those communities.</p> <p>Like the Conservancy, the MRCA is dedicated to the preservation and management of local open space and parkland, watershed lands, trails, and wildlife habitat. 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.</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 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.</p> <p>Based upon the above discussion and the analysis contained within the DEIR, the Conservancy/MRCA Staff have determined that days use and overnight camping areas would be adequately supervised and managed to avoid an increase in the likelihood of wildfire when compared to that of the existing baseline condition(s).</p> <p>Please, also, see Topical Response #2.</p> <p>Therefore, no further revisions to the DEIR would be required.</p>
<p>B-4</p>	<p><i>This comment asks where the Conservancy was when lost hikers in the Malibu area started a campfire in early February.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment</p>

	will be included in the FEIR presented for review and consideration by the Conservancy/MRCA's decision-making body. Please, also, see Topical Response #2.
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C

**From:** Tfccorp@aol.com [mailto:Tfccorp@aol.com]  
**Sent:** Monday, February 22, 2010 12:24 PM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** overnight camping

.Considering the fact that all of Malibu is prone to fires. How anyone would consider allowing campers to build camp fires and stay overnight is ludicrous. There are so many areas that allow camping why insist on this particular area.

C-1

How easy we forget the Corral Canyon fire.

C-2

Sincerely,

Ruth Staub

<p><b>Letter C</b>  <b>Commenter: Ruth Staub</b>  <b>Date: February 22, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>C-1</p>	<p><i>This comment expresses concern with allowing overnight camping and campfires in Malibu, which is prone to fires.</i></p> <p>RESPONSE:</p> <p>Please see response to comment A-4. Please, also, see Topical Responses #1 and #2.</p>
<p>C-2</p>	<p><i>This comment states how easy we forget the Corral Canyon fire.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Please, also, see Topical Response #2.</p>

**D**

**From:** SALVATORE A FISH [mailto:bajafish1@verizon.net]  
**Sent:** Tuesday, February 23, 2010 5:59 PM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** Overnight camping in Malibu

To Whom It May Concern,

Please note that we are two more 40-year residents of Malibu who question your analysis and appropriateness of overnight camping in Malibu. Surely, you must see the dangers of open fires and too few rangers to patrol the area!

D-1

We bought our little house in 1972 and have been through many fires, evacuations, etc. Please, please, apply your intelligence, good judgement, and common sense in further evaluating the real and potential dangers of fires in Malibu and environs and ways you can be responsible stewards of the land.

D-2

Thank you,  
Sal and Barbara Fish  
6440 Bonsall Drive  
Malibu, Ca.

<p><b>Letter D</b>  <b>Commenter: Sal and Barbara Fish</b>  <b>Date: February 23, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>D-1</p>	<p><i>This comment questions the analysis and appropriateness of overnight camping in Malibu and expresses concern with open fires and too few Rangers to patrol the park areas.</i></p> <p>RESPONSE:</p> <p>Please see response to comment A-4. Campfires are strictly prohibited under the proposed Plan; all campsites would be “cold camping.” During times when camping is allowed, a Camp Host, Park Ranger or staff maintenance person would be onsite to enforce all Park rules and regulations, including the “No Campfire” policy.</p> <p>See, also, Topical Response #2.</p> <p>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 avoid an increase in the likelihood of wildfire when compared to that of the existing baseline condition(s).</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>D-2</p>	<p><i>This comment requests that the real dangers of potential fires in Malibu be evaluated.</i></p> <p>RESPONSE:</p> <p>Please see DEIR Section 5.6, <i>Fire Hazards</i>, and response to comment A-4. The proposed Plan includes preparation of Fire Protection Plans for each park area, which provides an emergency plan-of-action to</p>

minimize the risk of fire ignition, reduce the risk to Park users and adjacent properties, enhance the ability of responding fire fighters to access the Parks, provide for well-ordered relocation of park visitors in the event of an emergency, and to prepare and condition for potential emergency situations, including notification and enforcement of all standard park rules and regulations per existing policies of the Conservancy/MRCA, which prohibits smoking and fires.

Please see response to comment D-1, and Topical Response #2.

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 are adequately designed and would be adequately supervised and managed to avoid an increase in the likelihood of wildfire when compared to that of the existing baseline condition(s).

Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.

**E**

**From:** Ken Heller [mailto:kennethdheller@gmail.com]  
**Sent:** Saturday, February 27, 2010 6:16 PM  
**To:** eircomments@smmc.ca.gov  
**Subject:** MRCA's Plan for Malibu Campsites -Another "NO" vote

To whom it may concern:

Please accept this email as a **'NO VOTE' for MRCA's Public Access Program** to include campsites in Malibu.

| **E-I**

Thank you  
Ken Heller

<p><b>Letter E</b>  <b>Commenter: Ken Heller</b>  <b>Date: February 27, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>E-1</p>	<p><i>This comment expresses the author’s opposition to the Malibu Parks Public Access Plan and inclusion of campsites.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Please, also, see Topical Responses #1 and #2.</p>

**F**

**From:** NTenfish@cs.com [mailto:NTenfish@cs.com]  
**Sent:** Monday, March 01, 2010 5:12 PM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** Camping

Hi,  
I agree with Ms Tellum  
We have regular state run campsites within 4 to 15 miles.  
We don't need more, closer to private homes.  
Thanks, John Tindall

| **F-I**

<p><b>Letter F</b>  <b>Commenter: John Tindall</b>  <b>Date: March 1, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>F-1</p>	<p><i>This comment states that there are enough state operated campsites within 4 to 15 miles of Malibu and there is no need for additional campsites near residential development.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>

-----Original Message-----

From: Gregg Beytin [mailto:bikegrog@aol.com]  
Sent: Tuesday, March 09, 2010 6:51 PM  
To: judi.tamasi@mrca.ca.gov  
Subject: Re: Planned campsites along PCH in Malibu

Hi Judi,

Thanks for contacting me. More campgrounds along the Malibu Coast sound great. One big problem for bicycle campers is the bike parking lots. Bicycle campers would prefer to have their bikes with them at their campsite. There are many reasons for this. I would guess, if bicycle campers were required to keep their bikes in a lot, especially if that lot is distant or remote (no line of sight from campground to bike lot) bicycle campers would either not use the campground or, more likely, break the rules in bring their bikes to the campsite. I'm sure a bike parking lot would be used by many of the campers who have low cost bikes that arrived at the campground on the back of their cars. My point is that people who ride bikes (some very expensive and full of emotional value to their owners) to the campground carrying their gear in panniers or trailers will object to parking their bikes in a location other than their campsite.

And yes, please add me to your mailing list.

Thanks,

Gregg

G-1

G-2

<p><b>Letter G</b>  <b>Commenter: Gregg Beytin</b>  <b>Date: March 9, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>G-1</p>	<p><i>This comment expresses support for more campgrounds along the Malibu Coast.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
<p>G-2</p>	<p><i>This comment suggests that bicycle campers be allowed to bring their bikes to their campsite instead of being required to lock their bikes at a potentially distant bike parking lot.</i></p> <p>RESPONSE:</p> <p>The proposed Plan does not prohibit bicycle campers from securing their bikes at the campsites.</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>

**From:** Marian Hall [mailto:sealanemalibu@yahoo.com]  
**Sent:** Friday, March 12, 2010 4:33 PM  
**To:** eircomments@smmc.ca.gov  
**Subject:** Santa Mountains

Building campsites and parking lots in 'wilderness' and residential areas urbanizes these areas and defeats the very purpose of losing a natural nature habitat.

H-1

A hiker hikes to commune with nature, the peace and quiet of the trail, the scenic views and to admire nature's flora and fauna of these beautiful Santa Monica Mountains.

H-2

Please cut out the politics and power plays. Enlarge the existing campgrounds. Reduce any building in the Santa Monica Mountains.

H-3

Please keep the integrity of the Santa Monica Mountains as Mother Nature intended.

Trails-YES

Camping-NO

H-4

Marian Hall

<p><b>Letter H</b>  <b>Commenter: Marian Hall</b>  <b>Date: March 12, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>H-1</p>	<p><i>This comment expresses concern that building campsites and parking lots in ‘wilderness’ and residential areas urbanizes these area and defeats the purpose of preserving the natural habitat.</i></p> <p>RESPONSE:</p> <p>The strategic objectives of the Plan are directed by the general goal of creating an interlinking network of parks, trails, and open space for diverse public use, wildlife and habitat protection, and for ensuring future preservation of open space and recreational lands. The Plan provides policies and implementation measures intended to preserve and link parks and open space via trail improvements and to provide a diversity of public access and recreation opportunities with critical support facilities.</p> <p>The Plan’s policy and implementation program, prepared in large part to reflect the policies and development standards adopted pursuant to Malibu Local Coastal Program Section 3.4.2, Malibu Parks Public Access Enhancement Plan Overlay, addresses development and management of trails, low-impact camp areas, public transit, public outreach and education programs, recreation support facilities, accessibility design guidelines, and a park and recreation sign program. The policy and implementation program also addresses issues associated with resource protection (environmentally sensitive habitat areas, water quality, visual and archaeological resources), hazards, land use and neighborhood compatibility. Please refer to <i>Appendix C</i> for a complete list of the Draft Public Works Plan Policies and Implementation Measures.</p> <p>It should be noted further, in response to comments raised on the</p>

	<p>DEIR, the Conservancy/MRCA is being presented with a Modified Redesign Alternative. This alternative would limit camping to primarily two parks: Corral Canyon Park and Malibu Bluffs Conservancy Property. See Topical Response #1.</p> <p>Based upon the above discussion and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>H-2</p>	<p><i>This comment expresses the commenter’s feeling of hiking in the Santa Monica Mountains.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
<p>H-3</p>	<p><i>This comment suggests enlarging existing campgrounds and reduce any building in the Santa Monica Mountains.</i></p> <p>RESPONSE:</p> <p>See response to comment H-1. Public camping opportunities within the Malibu area of the Coastal Zone are very limited. An expansion of existing public camping areas at Leo Carrillo State Beach or Malibu Creek State Park would not result in new coastal camping opportunities within close proximity to the existing/ proposed continuous public access trail system that provides unique and spectacular views of the coast and ocean and, wherever feasible, complete linkages for the Coastal Slope Trail, the Beach to Backbone Trail, from the beach to Malibu Bluffs, and other connector trails to access the coastal mountains and the shoreline. A number of project alternatives were evaluated within the DEIR.</p> <p>It should be noted further, in response to comments raised on the DEIR, the Conservancy/MRCA is being presented with a Modified Redesign Alternative. This alternative would limit camping to primarily two parks: Corral Canyon Park and Malibu Bluffs Conservancy</p>

	<p>Property. See Topical Response #1 and FEIR Section 15.</p> <p>Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p> <p>Based upon the above discussion and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>H-4</p>	<p><i>This comment requests keeping the integrity of the Santa Monica Mountains as Mother Nature intended and expresses the commenter’s support for trails and opposition to camping.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Please, also, see Topical Response #1.</p>

-----Original Message-----

From: Scott P. Harris [mailto:SPHARRIS@dfg.ca.gov]  
Sent: Tuesday, March 16, 2010 3:35 PM  
To: judi.tamasi@mrca.ca.gov  
Subject: Malibu Parks Public Access Enhancement Plan

Judi,

I am submitting the following comments regarding the Malibu Parks Public Access Enhancement Plan Draft Environmental Impact Report (DEIR), located within lands managed by the Mountains Recreation Conservation Authority within the Santa Monica Mountains, Los Angeles County. Please incorporate the following into the mitigation measures for the subject project

I-1

1. San Diego Desert Woodrat, (*Neotoma lepida intermedia*) - The project areas may provide habitat for San Diego desert woodrat (woodrat), a California species of special concern.

I-2

Preconstruction surveys and salvage of woodrat should be employed to avoid take. Trapping to salvage woodrat from project impact areas and/or hand removing nesting material is not recommended as a salvage method due to hantavirus hazards and undue stress to woodrat. Woodrat stick nests should be nudged with a front end loader to encourage woodrats to abandon the nest (young will probably hold on to female's teats and hopefully be taken if done during breeding season and not too quickly and abruptly) and escape into adjacent off site cover that will not be impacted by the project. The nest structure should then be carefully and slowly picked up with a front end loader to allow any additional woodrats to escape. The nest structure should then be moved to adjacent undisturbed habitat where the woodrats after regrouping will find the structure and usually scavenge the material and build new nests in adjacent habitat.

I-3

If suitable habitat is not available immediately adjacent to impact areas, new habitat on adjacent areas not impacted by the project should be created by providing vertical structure composed of laying downed or cut trees stacked horizontally in areas that are under a shady canopy or piling rocks to achieve this structure. It is very important that the structures are under shady areas or they will not be utilized by woodrat.

2. Salvage of wildlife species of low mobility - A biological monitor should be on site to salvage coast horned lizard (*Phrynosoma coronatum*), silvery legless lizard (*Anniella pulchra pulchra*) and any other species of low mobility that may be killed or injured by project activities. Salvaged wildlife should be captured and removed (or allowed to escape) to adjacent suitable habitat away from project disturbances.

I-4

3. Impacts to Department Jurisdictional Drainages - As stated in the DEIR, the project will impact areas that may be considered within Department jurisdiction pursuant to Section 1600 et seq. of the Fish and Game Code.

Please contact Mr. Rick Mayfield (Office phone - 805.985.5686/e-mail - [rmayfield@dfg.ca.gov](mailto:rmayfield@dfg.ca.gov)) with the Department, to coordinate further regarding applying for a Streambed Alteration Agreement prior to any direct or indirect impact to a lake or stream bed, bank or channel (including ephemeral and man made drainages) and/or associated riparian resources.

I-5

Further information on the Department's Lake and Streambed Alteration Program, including the applicable fees and notification packages with instructions may be viewed and downloaded at the below DFG website.

<http://www.dfg.ca.gov/habcon/1600/forms.html> .

Thank you for the opportunity to provide comments.

Scott Harris

Environmental Scientist  
California Department of Fish and Game  
Habitat Conservation Planning  
Phone: 626/797-3170

**Letter I**  
**Commenter: Scott Harris, California Department of Fish and Game (CDFG)**  
**Date: Habitat Conservation Planning**  
**March 16, 2010**

<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 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</p>
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	<p>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.</p> <p>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.</p> <p>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.</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>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>I-1</p>	<p><i>The commenter requests that mitigation measures regarding San Diego desert woodrat (Neotoma lepida intermedia), low mobility species, and impacts to jurisdictional drainages be incorporated into the project.</i></p> <p>RESPONSE:</p>

	<p>Thank you for your comment. Please refer to Responses I-2 through I-7, below.</p>
I-2	<p><i>The comment states that the project may provide habitat for San Diego desert woodrat, a California Species of Special Concern.</i></p> <p>RESPONSE:</p> <p>The commenter, CDFG, is correct. As stated in the <i>Biological Resources Technical Report for the Malibu Parks Public Access Enhancement Plan</i> (Dudek 2010), <i>Appendix H-1</i> of the DEIR, San Diego desert woodrat has a low to moderate potential to occur based upon habitats present on site. However, neither the species nor a woodrat nest was observed during the surveys conducted in the project study area. Nevertheless, mitigation measure MM Bio 10.2 has been augmented to address this concern. See response I-3 below.</p>
I-3	<p><i>CDFG recommends that pre-construction surveys and salvage for San Diego desert woodrat should be employed on the project and provides details on CDFG's recommended methodology.</i></p> <p>RESPONSE:</p> <p>In order to address CDFG's comments and specifically address the San Diego desert woodrat, MM BIO-10.2 has been modified as further detailed below. It should be noted that existing MM BIO-10.2, as identified within the DEIR, adequately addresses impacts to the San Diego desert woodrat, and requires that a biologist be on site during any clearing of habitat to flush sensitive species, including avian and other mobile species such as San Diego desert woodrat, from occupied habitat areas immediately prior to brush-clearing and earth-moving activities. Nevertheless, MM BIO-10.2 is modified as follows:</p> <p>MM BIO-10.2 The monitoring biologist shall be on site during any clearing of habitat (annual ground cover, shrubs, or trees). The monitoring biologist will flush sensitive species (avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities.</p> <p><b><u>I) San Diego Desert Woodrat: Prior to construction activities in grassland, scrub, chaparral, oak woodland, riverbank, and agriculture habitats, or other suitable</u></b></p>

	<p><u>habitat a qualified biologist shall conduct a survey within the proposed construction disturbance zone and within 200 feet of the disturbance zone for San Diego desert woodrat nests. If active San Diego desert woodrat (<i>Neotoma lepida intemedia</i>) nests are identified within the disturbance zone, under the supervision of monitoring biologists, woodrat stick nests shall be nudged with a front end loader to encourage woodrats to abandon the nests and to escape into adjacent areas. The nest structure shall then be carefully and slowly picked up with a front-end loader to allow any additional woodrats to escape. The nest structure shall then be moved to adjacent undisturbed habitat. If suitable habitat is not available immediately adjacent to impact areas, new habitat on adjacent areas not impacted by the project shall be created by providing a vertical structure composed of laying downed or cut trees stacked horizontally in areas that are under a shady canopy, or piling rocks under a shady canopy, to achieve this structure. No trapping and/or hand removal of nesting materials shall occur.</u></p> <p>The above clarified version will be included as <b>MM BIO-10.2</b> in the MMRP for the adopted Plan. The clarification does not alter the function or efficacy of the mitigation, but makes it more specific. The required mitigation monitoring and reporting program would ensure compliance with the clarified mitigation measure.</p> <p>Based upon the above discussion and the analysis contained within the DEIR, no revision of the DEIR would be required.</p>
I-4	<p><i>CDFG recommends that a biological monitor be on site to salvage and relocate coast horned lizard (<i>Phrynosoma coronatum</i>), silvery legless lizard (<i>Anniella pulchra pulchra</i>) and any other species of low mobility.</i></p> <p>RESPONSE:</p> <p>MM BIO-10.2, as identified within the DEIR, adequately addresses impacts to species of low mobility, which requires that a biologist be on site during any clearing of habitat to flush sensitive species from occupied habitat areas immediately prior to brush-clearing and earth-</p>

	<p>moving activities. Nevertheless, out of an abundance of caution, and in order to address CDFG’s comments and specifically address the low mobility species, MM BIO-10.2 has been modified to include the following:</p> <p>MM BIO-10.2 The monitoring biologist shall be on site during any clearing of habitat (annual ground cover, shrubs, or trees). The monitoring biologist will flush sensitive species (avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities.</p> <p><b><u>2) Low Mobility Species: Pre-construction surveys and avoidance measures shall be implemented for low mobility species, such as coast horned lizard and silvery legless lizards. During brush-clearing and earth-moving activities occurring in or directly adjacent to occupied or suitable habitat for low mobility species, pre-construction surveys shall be conducted by the project biologist to determine if low-mobility special-status species are present. If visual searches or raking are used for pre-construction surveys, the project biologist shall conduct surveys no earlier than 72 hours prior to disturbance, and if pitfall trapping is used, the Project Biologist shall conduct trapping no earlier than 5 days prior to disturbance. If these species are located in the disturbance zone, then individuals shall be captured and relocated, or allowed to escape, to suitable habitat for the species outside of the disturbance footprint.</u></b></p> <p>The above clarified version will be included as <b>MM BIO-10.2</b> in the MMRP for the adopted Plan. The clarification does not alter the function or efficacy of the mitigation, but makes it more specific. The required mitigation monitoring and reporting program would ensure compliance with the clarified mitigation measure.</p> <p>Based upon the discussion above and the analysis contained within the DEIR, no revision of the DEIR would be required.</p>
I-5	<p><i>CDFG comments that the DEIR will impact areas that may be considered within CDFG’s jurisdiction pursuant to Section 1600 et seq. of the Fish and Game Code. CDFG provides the contact information to coordinate further</i></p>

*regarding applying for a Streambed Alteration Agreement prior to impacts. CDFG also provides the website address for their Lake and Streambed Alteration Program*

**RESPONSE:**

A Streambed Alteration Agreement is listed on page 2-71 of the DEIR as a required approval and/or permit to implement the project. The contact information and website provided by CDFG has been noted. Thank you for your comments and the information.



COUNTY OF LOS ANGELES  
DEPARTMENT OF PARKS AND RECREATION  
*"Creating Community Through People, Parks and Programs"*

Russ Guiney, Director

March 17, 2010

Sent via email: [EIRcomments@smmc.ca.gov](mailto:EIRcomments@smmc.ca.gov)

Ms. Judi Tamasi  
Santa Monica Mountains Conservancy  
Mountains Recreation & Conservation Authority  
5750 Ramirez Canyon Road  
Malibu, California 90265

Dear Ms. Tamasi:

**NOTICE OF AVAILABILITY/COMPLETION OF  
DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)  
MALIBU PARKS PUBLIC ACCESS ENHANCEMENT PLAN  
PUBLIC WORKS PLAN**

The Department of Parks and Recreation has reviewed the above project for potential impact on the facilities under the jurisdiction of the Department. We have determined that the proposed project will not affect any Departmental facilities.

Thank you for including this Department in the review of this notice. If we may be of further assistance, please contact me at (213) 351-5127 or [jyom@parks.lacounty.gov](mailto:jyom@parks.lacounty.gov).

Sincerely,

Julie Yom  
Environmental & Regulatory Permitting Section

JY: tls/ response to Malibu Parks Public Access Enhancement Plan DEIR

c: Parks and Recreation (N. E. Garcia, L. Hensley, J. Rupert)

<p><b>Letter J</b>  <b>Commenter: Julie Yom, County of Los Angeles Department of Parks and Recreation</b>  <b>Environmental &amp; Regulatory Permitting Section</b>  <b>Date: March 12, 2010</b></p>	
<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 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</p>

	<p>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.</p> <p>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.</p> <p>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.</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>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>J-1</p>	<p><i>This comment states that the County of Los Angeles Department of Parks and Recreation has reviewed the proposed project for potential impacts on their facilities and determined that the proposed project would not affect any of the County of Los Angeles Parks and Recreation Department facilities.</i></p> <p>RESPONSE:</p>

	This comment has been noted. Thank you for your comment.
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**From:** Jackie Robbins [mailto:jackie@leatherwaves.com]  
**Sent:** Thursday, March 18, 2010 1:55 PM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** EIR Comments and Concerns

March 18<sup>th</sup> 2010

Dear Santa Monica Mountains Conservancy,

I was invited to the Environmental Hearing on February 22<sup>nd</sup> 2010 to give my comments and state my concerns about the “Malibu Parks Public Enhancement Plan” and the consequent Draft EIR. I am extremely grateful for this invitation. I attended the meeting and brought my notes. Unfortunately, I was unable to muster the courage to stand in front of the crowd and read my comments, because I am still too broken-hearted over losing my home of 35 years and my local Malibu business of 33 years in the devastating Corral Canyon fire of November 24<sup>th</sup> 2007, that was started in a State Park by campers and their campfire.

I am a 57-year-old woman who is a single mother. I moved to Corral Canyon in 1974 at the age of 22, purchased my property in 1979 at the age of 26 and built a successful local business, starting in 1975. The loss from this fire added up to millions for me personally, the lifelong product of my hard work. I was only able to recover a percentage of this from my insurance after an arduous fight and as of today (2 1/2 years later), I am still not rebuilt, I have not been able to return to my home, nor work in my business. 53 of my neighbors also lost their homes in the same fire, and most of their stories are worse than mine. Two of our most senior residents, 50 years+ in Corral Canyon, Ben Kennedy and Eleanor Mills died within weeks of losing their homes, because the burden of rebuilding was simply too much.

The pandemonium that I experienced on Corral Canyon Road, at 4:30am on November 24<sup>th</sup> 2007, was one of the most frightening things I’ve ever witnessed. Families packing their cars, and trying to get to safety, no fire department in sight, and a raging wildfire moving at 70mph. I had 20 minutes to evacuate. Countless pets were lost as they ran out of control; there are stories of women and children barely getting out of their houses before the flames.

The idea that new and additional camping sites are proposed for this fragile and extremely dangerous area is so insanely ludicrous, that I can barely grasp it.

These are my specific comments on the EIR and the Malibu Parks Public Access Enhancement Plan;

- 1) In an emergency situation; such as, but not limited to:

K-1

K-2

- Wildfire, Earthquake or Floods (all of which I have experienced many times in my 35-year residency) how will you handle;
- a) Getting guests to the park off the trails and evacuated from Corral Canyon, is there an evacuation plan? **K-2**
  - b) The EIR (5.6-54) specifies that there will be facilities for fire protection.... who will be there to instruct people how to use it? **K-3**
  - c) If there is even a possibility that professional fire fighters may not arrive, as was the case on November 24<sup>th</sup> 2007, how will a calm and efficient evacuation take place? **K-4**
  - d) The EIR (5.6.54) states that these proposed campsite areas would be routinely patrolled. What does this mean? Who will do it? Will it be everyday? Will there be officers placed on “red flag” days when the fire dangers are highest? **K-5**
  - e) The EIR (5.6-58) states that the proposed fire shelters are one-hour rated. The fire of November 24<sup>th</sup> 2007 burned for 3 days and at it’s height burned at over 1000 degrees. How will human beings survive in these fire shelters? **K-6**
  - f) A one inch hose reel is planned for emergencies in the camp areas. How will campers know how to use them, or how to operate a hose reel? **K-7**
  - g) The campsite planned between Corral Canyon and Puerco Canyon is located in an area covered in tall grass leading to Chaparral. This equates to quickly ignited fast burning fuel feeding into much more dangerous fuel. What are your plans for mitigating a burning fire in this area? **K-8**
  - h) A narrow two-lane road and only avenue of escape that must stay open for residents, city and county personal, and emergency vehicles (that often take up both lanes, ie: fire trucks), will have to serve campers and visitors to these campsites, what is the emergency plan for this likely scenario? **K-9**
- 2) I am trying to understand that the Mountains Recreation and Conservation Authority (“MRCA”) will be responsible for these proposed campsite areas.
- a) How many Rangers do they employ? **K-10**
  - b) How often and how many will be consistently onsite?

- c) Where in Malibu do they currently exist NOW?
- d) How prepared are they to deal with emergency situations?
- e) How many fires have these rangers participated in, and where? I am compelled to remind you that several ranger houses burned in Solstice Canyon-lower Corral Canyon, a State Park during the November 24<sup>th</sup> 2007 wildfire.
- 3) The EIR (5.6-7) in the Malibu, Santa Monica Mountains, and 99% of all fires were a result of human activity.
- a) The EIR (5.6-7) shows that the times that Corral Canyon has burned is highest number of fires in the Malibu Area.
- b) The EIR (5.6-7) shows the Corral Canyon fire of 2007, but what about the fires of 1970, 1982, and 1996 (a fireman died in that one)?
- 4) Residents of Corral Canyon have routinely been left to their own devices, as emergency services are notorious for not arriving in time. What will the guests to these campsites be left to?
- 5) Fuel Modification plans is absolutely helpful. I have followed regulations for 35 years, and my home still burned in 1970, before I owned it and 2007. Wildfires are random and indiscriminating in what they burn. I have personally been through at least 6 in the Corral Canyon Area.
- 6) What will you do with the waste and trash, which becomes a fire hazard very easily? How much have you calculated will be generated based on the number of visitors you expect to serve each year?
- a) Will trash be recycled?
- b) Where will it be taken, by whom and how often?
- c) Where will septic waste go? Are there any plans for composting? How will the amount of waste produced effect the environment? Including the watertable.
- 7) I am extremely concerned about what the Park's impact will have on the environment. I am extremely concerned about what the Park's impact will have on wildlife. I am extremely concerned about what the Park's impact will have on plant life.

8) What kind of monitoring will be provided for the park? Will the monitoring be done by State Parks? In 35 years I have never seen a State Parks Ranger at the hiking trails at the top of the Corral Canyon Road, an existing State Park. Is this going to change? Will there be monitoring in the existing parks as well as the new ones?

- a) Who will be doing the monitoring?
- b) How many hours a day?
- c) How many people?
- d) How often will the Park be open?

**K-17**

9) Red Flag Days.... The guidelines in the EIR for patrolling only require supervision during authorized camping. Camping during Red Flag is not to be authorized therefore it seems that there will not be patrols during Red Flag conditions! Yet the November 24th 2007 fire was started by campers during Red Flag conditions. Frightening. Is it just me, or does anyone else realize how frightening this is?

**K-18**

10) On the subject of "Traffic Control" my neighbor, Matt Haines gave a detailed report at the February 22<sup>nd</sup> meeting on the dangers that arise, on Corral Canyon Road when visitor's park along the narrow 2 lane highway. These dangers will increase in an emergency situation.

- a) How will you mitigate the possible dangers to drivers and pedestrians on 2-lane road crosswalks?
- b) How will you mitigate the possible dangers at trailheads? (EIR 5.4-3C, and maps 5.1-1D and 5.6-4) or reference (EIR #33+34 photos on page 5.1-18)
- c) How will you mitigate the possible dangers of parking on Corral Canyon Road at blind curves and hilltops
- d) Will there be road signage?
- e) Will there be stops and stop signs?
- f) Will additional turnouts be made?
- g) What changes including these can we expect on the roadway and how will it impact traffic in Corral Canyon?

**K-19**

h) The campsite planned as a “hike in” site is planned for Corral Canyon near the creek about a half mile up from Malibu Seafood. There will not be road access to this site to facilitate patrolling or fire response.

K-20

If the Santa Monica Mountains Conservancy is allowed to move forward with its plan to introduce overnight camping in Corral Canyon, a campfire will spread and wreak havoc, endangering both campers and the already devastated residents of our fire-ravaged community.

K-21

Malibu has more than 1,000 campsites operated by federal, state and local agencies and private operators. Can anyone tell us why we need another one, in possibly the most dangerous, fire-prone canyon in California? Malibu has 23 events, catering and conference facilities that can each accommodate 100 to 500 people. Who could possibly defend a “need” for more?

K-22

Where are the funds coming from to create, properly maintain and supervise these new sites? We are in a budget crisis. How much it will cost the Fire Department to deal with another Corral Canyon conflagration? I think the Governor and other state officials would be looking for ways to reduce the possibility of fires, not increase their likelihood. But that is just what the Santa Monica Mountains

K-23

K-24

Conservancy and Coastal Commission would be doing by introducing overnight camping into the dangerous canyon areas above Malibu.

All of Corral Canyon is categorized as a “Very High Fire Hazard Severity Zone” with a very high chaparral “fuel load” (EIR). Threatening fines for smokers and campfires is useless when no effective patrolling is in place already.

K-25

The SMMC plans to put up a shelter and park a fire truck at the trailhead (Malibu Seafood). This doesn’t make much sense if there is no road to the campsite. And I’m afraid this is the kind of thought processing that threads throughout the EIR.

K-26

In conclusion I’d like to ask....

Are we, the local, good, hard working citizens of this community entitled to any protection? We pay taxes and support the schools; we work for environmental rights regarding our oceans, lands and wildlife. We are human beings, who long for the government agencies, such as you, to consider US. Why are we looked upon as selfish hoarding individuals, here in Malibu, when we host millions of people every year while they enjoy the Nature, that should remain protected and free for everyone.

K-27

I am not against hiking and day activities in the Santa Monica Mountains, which is properly monitored, where the education of visitors about the dangers for our sensitive environment and the protection of the citizens that live here is of foremost importance.

K-28

Please excuse me if my interpretation of the EIR is not complete, it was an overwhelming document for a layperson such as myself to interpret. I did my best to make you aware of mine as well as my neighbor's deep and profound worry about these decisions. Again I thank for the opportunity to have a voice. I write you in good faith for your most wise and intelligent decision making processes.

K-29

Sincerely,

Jackie Robbins

2033 Corral Canyon Road

Malibu CA 90265

310-457-7601

<p><b>Letter K</b>  <b>Commenter: Jackie Robbins</b>  <b>Date: March 18, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>K-1</p>	<p><i>This comment provides a personal account of the commenter’s experience from the Corral Canyon fire.</i></p> <p>RESPONSE:</p> <p>The commenter notes the effects caused by wildfires and the difficulty in recovery and rebuilding.</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Nevertheless, please see Topical Response #2.</p>
<p>K-2</p>	<p><i>This comment questions how the Conservancy would evacuate guests of the trails in Corral Canyon Park and if there is an evacuation plan.</i></p> <p>RESPONSE:</p> <p>Please see response to comment A-4 and Topical Response #2. The proposed Plan includes a Master Fire Protection Plan and focused Fire Protection Plans for each park area, providing detailed analysis of the affected Plan area, the Plan's potential risk for wildfire, and its impact on fire response capabilities. The Fire Protection Plans (FPPs) provide a redundant layering of prevention, protection, suppression and pre-planning methods and measures that have been proven to reduce fire risk. The combined fire protection system designed for the proposed Plan includes fuel reduction/treatment, enhancement and maintenance</p>

	<p>of ingress/egress routes, park and trail access control, emergency relocation plans and options for contingency sheltering areas, park closure during red flag days and flash flood warnings, and restriction of open flames in all Park areas, amongst others. Implementation of the FPP would significantly reduce the existing fire risk within the Plan area. For additional analysis/ discussion, please See Section 6.1 (Relocation Planning of the Corral Canyon FPP (contained within DEIR, <i>Appendix I</i>).</p> <p>Additionally, in response to a number of concerns and issues raised regarding fire hazards and safety, the Conservancy/MRCA has been presented with a MRA that reduces the number of campsites and limits camping to primarily two campsites: Corral Canyon Park and the Malibu Bluffs Conservancy Property. Camp Area 2 previously proposed at Corral Canyon Park has been deleted and replaced with a day-use picnic area in the MRA. The reduction in camp sites and inclusion of various additional restrictions reduce the risk of hazards to an even greater degree. Additional features have been added to the MRA including, 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. A Master Fire Protection Plan and Focused Fire Protection Plans for each park property are also included in the FEIR for the Modified Redesign Project Alternative (FEIR, <i>Appendix MRA-5</i>).</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>K-3</p>	<p><i>This comment requests clarification as to who would be onsite to instruct people on how to use the fire fighting facilities proposed to be located at each park area.</i></p> <p>RESPONSE:</p> <p>A Camp Host, staff maintenance person, or Park Ranger, who is wildland fire-trained, would be on site at each park property during times when camping is permitted and, in concert with other MRCA rangers patrolling and serving the area, would be responsible for</p>

operating the fire fighting facilities proposed at the park areas. Campers/ hikers would not be expected to fight wildfires, utilize fire fighting equipment (i.e., hydrants, etc.) for which they have no training, but instead would be safely relocated from a wildfire area consistent with Fire Protection Plan procedures contained within the DEIR, *Appendix I*.

In addition, in response to a number of concerns and issues raised regarding fire hazards and safety, a MRA has been proposed for consideration by the Conservancy/MRCA. Features have been added in the MRA to address the community's fire concerns and the FEIR includes an analysis of the Modified Redesign and associated Fire Protection Plans. The MRA reduces the number of campsites in the Plan area and limits camping to clustered locations at Corral Canyon Park and the Malibu Bluffs Conservancy Property. The MRA Project Description included in the FEIR (*Appendix MRA-1*) includes the following description regarding use of proposed fire fighting and safety facilities:

**“Directions for the use of the shelters would be located on the interior and exterior of each structure which would describe what the shelter is, and when and how it should be used. The shelters would be available for use by anyone and would not be locked; instead, signs would be posted indicating that there would be penalties for inappropriate use. In most situations, it would be anticipated that the assigned wild-fire trained camp host and/or park ranger would instruct park guests to either evacuate the park or enter the fire shelter based upon the best available information and judgment of that professional (see FPP for additional information).”**

**Campers will be encouraged to utilize fire extinguishers for any observed small fires and to report any and all fires to a wildfire-trained camp host or ranger, who are trained in emergency response and the use of all on-site fire fighting equipment. There is no expectation that campers would stay on-site to extinguish a wildland fire.”**

Based upon the above discussion and the analysis contained within the

	DEIR, no further revision of the DEIR would be required.
K-4	<p><i>This comment requests clarification as to how a calm and efficient evacuation would take place.</i></p> <p>RESPONSE:</p> <p>As mentioned above in response to comment A-4 and K-2, the Fire Protection Plan's contain detailed relocation plans for each park area. On-site MRCA fire fighting personnel and Rangers would enact pre-planned procedures to initiate relocation, as detailed in the Master and focused FPPs contained within the DEIR (<i>Appendix I</i>).</p> <p>See, also, 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>
K-5	<p><i>This comment requests clarification when campgrounds would be patrolled, by whom, and whether Rangers would be onsite during "red flag" days.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2 and A-4. During Red Flag days/periods as declared for the Santa Monica Mountains area by the National Weather Service, a division of NOAA, all the Parks would be closed to all recreational use. Park properties would be posted and patrolled by Park Rangers (24-hour patrols) to inform visitors of Red Flag Day closures and notification provided that violation of the Red Flag Day closure policy may be punishable by fines up to \$1,000.</p> <p>In addition, in response to a number of concerns and issues raised regarding fire hazards and safety, a MRA has been proposed for consideration by the Conservancy/MRCA. Features have been added in the MRA to address the community's fire concerns and the FEIR includes an analysis of the Modified Redesign and associated Fire Protection Plans. The MRA reduces the number of campsites in the Plan area and limits camping to clustered locations at Corral Canyon Park and the Malibu Bluffs Conservancy Property allowing for more efficient patrol and supervision of camp areas. 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</p>

	<p>included in the MRA, during times when camping is permitted at the location.</p> <p>See, also, Topical Response #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>K-6</p>	<p><i>This comment questions how the proposed emergency fire shelters would protect occupants from temperatures exceeding 1,000 degrees and lasting for several hours, when the shelters are one-hour rated.</i></p> <p>RESPONSE:</p> <p>Both the required and optional emergency fire shelters identified within the Plan would be fire resistant. The fire rating on the shelters refers to continuous flame placed directly on the structure. As noted by the office of the State Fire Marshal, a building will be exposed to the main flame front of a wildfire for a relatively short period of time, 5 to 10 minutes on average (FEIR, Appendix MRA-5). This exposure time will be shorter and less intense when proper fuel modification zones are in place. Buildings are subject to pre- and post-fire for a longer period of time, which may include wind, flying embers, and spot fires. The temporary shelter structures provided at each park site will provide a safer environment than remaining outdoors, exposed to the wildfire. In no case would the shelters be exposed to long-term external fire sources. The reference to a 3-day fire is not applicable. A fire that is miles away would not require on-site sheltering. The optional emergency fire shelters are a “last resort” for cases where relocation offsite is not possible.</p> <p>In response to a number of concerns and issues raised regarding fire hazards and safety, a MRA has been proposed for consideration by the Conservancy/MRCA (see FEIR, Volume IV, Appendices MRA-1 and MRA-5); both required and optional fire shelters have been identified on MRA project plans, consistent with initial direction by LACFD.</p> <p>Please, also, see Topical Response #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>K-7</p>	<p><i>This comment questions how campers will know how to use and/or operate the proposed one-inch hose reel planned for emergencies at each camp area.</i></p> <p>RESPONSE:</p> <p>See response to comment K-3.</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>K-8</p>	<p><i>This comment expresses concern with a campsite area planned between Corral Canyon and Puerco Canyon in tall grass leading to chaparral and asks what fire mitigation is planned for this area.</i></p> <p>RESPONSE:</p> <p>Please see responses to comments A-4 and K-2. See, also, 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>K-9</p>	<p><i>This comment expresses concern with emergency response/access along the existing narrow two-lane roads in the area that would also need to serve campers and visitors to the park area and wants to know the proposed evacuation plan for such areas.</i></p> <p>RESPONSE:</p> <p>See response to comment A-4 and K-2. The MRCA has pre-planned for wildfire emergencies (see Fire Protection Plans), which includes a relocation/ evacuation component.</p> <p>The proposed Plan has been designed in consultation with LACFD. LACFD has raised no objections or concerns to the use of existing roads to access Escondido Canyon Park, Latigo Trailhead Property, Corral Canyon, and Malibu Bluffs Conservancy Property. Access improvements for Ramirez Canyon Park have been a subject of discussion with LACFD in order to ensure the safe and orderly evacuation of people within that portion of the Plan area.</p>

The proposed Plan includes a preliminary design for emergency ingress/egress road improvements for the Ramirez Canyon community, with the actual improvements being implemented consistent with Los Angeles County Fire Department's (LACFD) final design and timing requirements. These preliminary design improvements include widening of the existing access road and removal of encroachments in the road easements, as necessary, to provide 20-ft clearance for emergency ingress/egress in the canyon along Delaplane Road and Ramirez Canyon Road, per the initial recommendations of the Los Angeles County Fire Department, as illustrated on project plans prepared by Penfield & Smith (see DEIR, *Figure 2-11*). These improvements (or other similar alternative measures required by the appropriate fire agency consistent with Fire Code allowances) would enhance overall vehicular access along Ramirez Canyon Road and would provide for improved emergency access to and from the Ramirez Canyon corridor.

Pursuant to the initial recommendations of the LACFD, the Plan also includes a preliminary design for improvements to Via Acero to provide secondary emergency vehicular ingress/egress for Ramirez Canyon, as identified on the Penfield & Smith Modified project plans. The secondary emergency access improvements include extending the paved portion of Via Acero generally along the path of an existing dirt road for approximately 1,400-ft to intersect with Kanan Dume, and widening of Via Acero to 20-ft over its entire length between Kanan Dume and Ramirez Canyon Road (approximately 2,938 ft).

Improvements to Via Acero (or other similar alternative measures required by the responsible fire agency consistent with Fire Code allowances) shall be implemented consistent with the responsible fire agency's final design and timing requirements.

The proposed Plan requires the use of vans and shuttles for Public Outreach Programs, Events, Gatherings, Tours, and Workshops at Ramirez Canyon Park to minimize traffic trips on Ramirez Canyon Road, and requires that such vehicles travel with maximum passenger capability and in convoys, whenever feasible. Transportation to/from Ramirez Canyon Park for these pre-arranged group activities generally requires use of 15-passenger vans, except for Public Outreach Programs that may utilize 22-passenger vans, mini-coaches or small

	<p>buses limited to a maximum of 30 feet in length. These measures further serve to limit vehicle trips and maintain ample capacity on Ramirez Canyon Road at all times for responding firefighter access and adjacent property owner relocation in the event of emergency.</p> <p>Vehicle access to Corral Canyon Park and Malibu Bluffs would be from Pacific Coast Highway, which is a four-lane highway. Vehicular access to Escondido Canyon Park would be from Winding Way, a two-lane undivided roadway, with an average width of 20-feet, while vehicle access to Latigo Canyon Trailhead would be from Latigo Canyon Road, a two-lane undivided roadway, with an average width of 22-feet. Both of these roadways operate at Level of Service (LOS) A, which is generally low traffic volumes, with free-flow traffic operations.</p> <p>Specific measures for relocation are identified within the FPP. See, also, Topical Response #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>K-10</p>	<p><i>This comment requests clarification regarding MRCA's Park Ranger responsibilities with respect to the proposed campsite areas.</i></p> <p>RESPONSE:</p> <p>Please see response to comment A-2. MRCA currently employs twenty-two (22) Park Rangers that implement the MRCA ordinance (see DEIR, Appendix P) 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 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. No Park Rangers are currently stationed in the Malibu area. The closest Park Ranger station to the Malibu area is located at MRCA's King Gillette Ranch at 26800 Mulholland Highway, located approximately six miles from Malibu Bluffs and 12 miles from Ramirez Canyon Park.</p>

	<p>In addition, all Park Rangers are trained wildland firefighters. 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. MRCA provides evacuation planning that includes pre-plan/fire action plan for responding to fire emergencies.</p> <p>See, also, Topical Response #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>
K-11	<p><i>This comment states that Corral Canyon has burned the highest number of times in the Malibu area and asks what about the fires of 1970, 1982, and 1996.</i></p> <p>RESPONSE:</p> <p>Comment noted. CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p> <p>Table 5.6-1 in Section 5.6, <i>Fire Hazards</i>, of the DEIR provides a fire history in the Malibu area. The table includes the 1970 Wright Fire, the 1982 Dayton Fire, and the 1996 Calabasas Fire. See, also, Topical Response #2.</p>
K-12	<p><i>This comment expresses concern with campers being left to their own devices during an emergency situation.</i></p> <p>RESPONSE:</p> <p>See response to comment K-3. See, also, Topical Response #2.</p>

	<p>Based upon the above and the analysis contained within the DEIR, no further revision of the DEIR would be required.</p>
<p>K-13</p>	<p><i>This comment expresses support for fuel modification plans, but states that the commenter’s home still burned in 1970.</i></p> <p>RESPONSE:</p> <p>Comment noted. CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p> <p>Fuel modification areas are designed to gradually reduce fire intensity and flame lengths from advancing fire by reducing fuels, placing thinning zones, restricted vegetation zones, and irrigated zones adjacent to each other on the perimeter of structures and adjacent naturally vegetated areas. The fuel modification area is one of many components of the fire protection system designed for the Plan area. Fuel modification requirements would vary at each park property depending on site-specific characteristics and the type of improvement/uses proposed. Site-specific planting and spacing requirements apply to all Parks, as described in detail in DEIR (Appendix I).</p> <p>See, also, Topical Response #1 and #2, as well as FEIR (Volume IV, Appendix MRA-5).</p>
<p>K-14</p>	<p><i>This comment expresses concern with trash removal and the potential fire hazard it may create if not collected. The commenter also requests additional information regarding septic waste.</i></p> <p>RESPONSE:</p> <p>The proposed Plan improvements include park and trail improvements that are minor in nature and would not generate substantial amounts of solid waste, either from a project construction or operational standpoint (see DEIR, Section 5.16, Utilities/ Service Systems).</p>

	<p>MRCA Ordinance No. I-2005 includes Section 3.5 under General Rules and Regulations that no person shall litter or leave any trash, garbage or refuse of any kind in any parkland; the ordinance does not address trash and recycling collection and proper disposal or signage encouraging park users to properly dispose of their trash. The proposed Plan includes new signage that would be posted at all trailheads and camp areas encouraging users to properly dispose of their trash. The Plan, also, identifies that MRCA staff would be responsible for picking up trash at trailheads, within campsites, and along trails (during patrols or maintenance/monitoring), either by hand or by hand tool.</p> <p>Trash levels within the Plan area would be regularly monitored; trash would be disposed of at regular intervals to avoid both health and fire hazards.</p> <p>In regards to septic waste, please see response to comment K-15.</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>K-15</p>	<p><i>This comment requests information where septic waste would go and if there are any plans for composting and whether the amount of septic waste generated would affect the environment, including groundwater.</i></p> <p><b>RESPONSE:</b></p> <p>See DEIR, Section 5.10, <i>Hydrology, Drainage, and Water Quality</i>, and Section 5.16, <i>Utilities/ Service Systems</i>. As described in the DEIR, no new septic systems are proposed as part of the Plan. All new restrooms proposed as part of the Plan would be self-contained chemical restrooms, with the exception of three proposed restrooms at Ramirez Canyon Park. These three restrooms would be connected to an existing state-of-the-art alternative wastewater treatment and recycled water system currently serving the Ramirez Canyon Park uses. The system provides secondary treatment, filtering and disposal of the effluent for reuse in subsurface landscape irrigation. The highly treated effluent is pumped to a terraced orchard area onsite for subsurface irrigation. The existing wastewater treatment system at Ramirez Canyon Park can effectively receive and treat the effluent that</p>

	<p>would be generated by a 200-person event (the maximum proposed event size), and would be supplemented by portable self-contained restrooms when necessary. Existing septic systems at the Art Deco House and Caretaker’s residence, proposed for small group gatherings/ tours use and on-site employee (&amp; family) residential use, respectively, are currently performing adequately; no increase in maintenance or service is anticipated.</p> <p>The Plan includes a comprehensive maintenance plan for the proposed park and trail facility improvements (see DEIR, Section 2.3.5, <i>Project Description</i>). Under the Plan’s maintenance plan, the self-contained chemical restroom tanks are proposed to be pumped at least once per month (note: the restrooms would be inspected during maintenance and cleaning; maintenance 5-7 times per week and cleaning 3 times per month), restroom overflow due to capacity concerns is, therefore, considered highly improbable.</p> <p>The Plan includes Water Quality Implementation Measures 5 thru 8 that require proper maintenance/monitoring to ensure impacts to water quality would be avoided.</p> <p>Based upon the above discussion and the analysis contained within the DEIR, groundwater impacts would not occur; no further revision of the DEIR would be required.</p>
K-16	<p><i>This comment expresses concern relative to impacts to wildlife and plant as a result of Plan implementation.</i></p> <p>RESPONSE:</p> <p>Impacts to wildlife and plants are addressed in the DEIR, Section 5.4, <i>Biological Resources</i>. All identified impacts would be mitigated to a less than significant level.</p> <p>Based upon the above discussion and the analysis contained within the DEIR, no further revision of the DEIR would be required.</p>
K-17	<p><i>This comment asks what kind of monitoring would be provided at the parks and park hours.</i></p> <p>RESPONSE:</p>

	<p>Please see response to comments A-2, B-3, and K-10. MRCA Ordinance No. 1-2005 includes Section 3.1, which states that parks are closed from sunset to sunrise unless different hours are otherwise posted. No person shall be present in or remain in or upon parkland during hours that the property is closed. Park Rangers conduct periodic patrols of MRCA parks from 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. The proposed Plan includes the requirement that a Camp Host, staff maintenance person, or Park Ranger, who is wildland fire-trained, be on site at each park property during the times camping is permitted. See, also, Topical Response #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>
K-18	<p><i>This comment expresses concern that during Red Flag Days, no Park Rangers would be on duty patrolling the parks.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, K-10, and K-17. See, also, Topical Response #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>
K-19	<p><i>This comment concerns the issue of traffic control and requests additional information regarding the design (turnouts, signage, stop signs, etc.) and mitigation of potential dangers at Corral Canyon Road.</i></p> <p>RESPONSE:</p> <p>Traffic and circulation is evaluated within the DEIR, Section 5.15, <i>Transportation &amp; Parking</i>. The trailhead and camping areas proposed for Corral Canyon Park do not take access off Corral Canyon Road. These facilities take access from the parking lot on PCH located 0.5 miles east of the PCH/Corral Canyon Road intersection. Traffic generated by the project would not, in general, utilize Corral Canyon Road. The project traffic consultant (ATE) indicates that painted crosswalks are not warranted, and therefore, not recommended</p>

	<p>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). It is recommended that signs be installed on the trails to notify pedestrians/hikers of vehicle traffic at the road crossings.</p> <p>The PWP policies and implementation measures (see DEIR, Appendix C) 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 relative to the Sign Program is provided: <b><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></b></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>K-20</p>	<p><i>This comment states that the campsite planned as a “hike-in” site in Corral Canyon Park near the creek is about a half mile up from Pacific Coast Highway, and therefore, there would not have road access to the campsite to facilitate patrolling or fire response.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2 and A-4. Campsites are located approx. 1,200 ft from PCH. Access via foot, bike, horse, or ATV is possible at this location. At an average walking speed of 4 feet per second, it would be a five minute hike. In the event of an emergency, a more rapid response would be anticipated. On-site equipment would facilitate fire response from campers (fire extinguishers) and/or from wildfire trained specialists (fire hydrants/ hoses and portable, air-powered quick attack firefighting systems). Coupled with active vegetation management in/ around camp areas, as well as other measures outlined in the Fire Protection Plan, patrols and fire response at Corral Canyon (Camp Area 2) would be adequate. See, also, Topical Response #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>
K-21	<p><i>This comment states that the introduction of overnight camping in Corral Canyon would wreak havoc if a campfire were to spread.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2 and A-4. See, also, 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>Based upon the above discussion and the analysis contained within the DEIR; no further revision of the DEIR would be required.</p>
K-22	<p><i>This comment states that there are more than 1,000 campsites operated by federal, state, and local agencies in Malibu and 23 event, catering, and conference facilities, each able to accommodate 100 to 500 people, and asks why there is a need for additional facilities.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
K-23	<p><i>This comment asks where are the funds to create, maintain, and supervise the proposed improvements.</i></p> <p>RESPONSE:</p> <p>MRCA obtains its funds largely from Proposition A (1986), Los Angeles County tax revenue, and self-generated operational activities. According the MRCA Executive Director, current MRCA staffing is believed to be adequate to serve the proposed uses within the Plan area.</p>

	<p>The MRCA operations budget has increased every year for approximately the past 10 years and is not subject, in general, to the vicissitudes of state budget crises. According the MRCA Executive Director, funding for PWP would be a priority for MRCA. There may be fees associated with day use/ camping activities, although that income is not anticipated to not pay for all of the costs of Plan implementation. Potential day use and overnight fees would be comparable to or less than State Parks fees.</p> <p>DEIR Section 2.3.5 (Operations &amp; Maintenance) within the <i>Project Description</i> provides additional information on operations and maintenance.</p> <p>It should be noted, however, that project funding need not be analyzed within the context of CEQA.</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
<p>K-24</p>	<p><i>This comment states that we are in a budget crisis and asks how much it will cost the Fire Department to deal with another Corral Canyon Fire. The commenter also expresses their opinion that the Governor and other state officials would be looking for ways to reduce the possibility of fires, not increase their likelihood, which is what the proposed Plan is doing.</i></p> <p>RESPONSE:</p> <p>See response to comment K-23.</p>
<p>K-25</p>	<p><i>This comment states that all of Corral Canyon is categorized as a “very high fire hazard severity zone” with high “fuel load” and threatening fines for smokers and campfires is useless when no effective patrolling is in place presently.</i></p> <p>RESPONSE:</p> <p>Please see responses to comments A-2, A-4, and K-10. Effective</p>

	<p>patrolling, coupled with the other measures contained within the Fire Protection Plan, would be in place at Corral Canyon, to provide a greater level of fire security than that which exists under the current baseline condition. See, also Topical Responses #1 and #2. Please note that the Conservancy/ MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p>
<p>K-26</p>	<p><i>This comment questions locating a fire shelter and fire truck at the Corral Canyon Trailhead when there would be no road to access the campsite.</i></p> <p>RESPONSE:</p> <p>The Fire Safety section of the DEIR, Section 2.0, <i>Project Description</i>, provides information related to the proposed Fire Truck Storage Sheds. The following paragraphs provide additional details relative to the location, use and occupancy of these structures.</p> <p>The Plan includes two Fire Truck Storage Sheds, which would be unmanned, enclosed steel structures, located on a concrete slab, and utilized for the parking of fire engines and/or housing miscellaneous fire protection equipment. The Fire Truck Storage Sheds are proposed at Corral Canyon Park Parking Area and Malibu Bluffs Parking Area I.</p> <p>The fire trucks are intended to service parklands owned and/or managed by the Conservancy/ MRCA. The primary first responders to City/County Parks and residential areas for medical and fire emergencies would continue to be the responsibility of LACFD. All maintenance of fire trucks, when and if acquired by the Conservancy/ MRCA, would occur off-site at Conservancy/MRCA Vehicle Service Shops (located at Towsley Canyon or King Gillette Ranch); sirens would be tested on a regular basis at one of these off-site Conservancy/MRCA Vehicle Service Shops.</p> <p>The Corral Canyon Park and Malibu Bluffs locations were identified by MRCA staff as appropriate sites for the Fire Truck Storage Sheds because sufficient room was available at these locations and because they are strategically located near Pacific Coast Highway for ready access by either on- or off-site MRCA rangers and wildfire trained specialists in need of MRCA-authorized use of fire fighting vehicles and/or equipment.</p>

While use of the Fire Truck Storage Sheds would supplement fire fighting capabilities within the region, they are not considered a critical component to the successful implementation of the Fire Protection Plan.

The proposed Plan includes the potential for the siting of optional fire shelters at the bluff top camp area (Camp Area I) and adjacent to Corral Canyon Road near Trail 13b in Corral Canyon Park. LACFD may require the “last resort” fire shelters at these locations. Should fires ignite nearby when campers are on site and evacuation/relocation from the site is not possible or is unsafe, campers would temporarily shelter in the provided fire structures while the fire front passed, then evacuate as directed by fire officials/law enforcement.

Again, seeking shelter in a fire shelter is a last-resort contingency measure with early evacuation the top priority and an abundance of caution by removing people from the area on days when wildfire ignitions and spread are most likely.

In consultation with LACFD, MRCA Ranger staff, and Waterworks District No. 29, additional information/ plan clarification is provided below relative to water infrastructure, which is intended to supplement the existing discussion contained Section 2.4 of the DEIR *Project Description*.

Corral Canyon Park and Malibu Bluffs would receive water via a proposed extension of either a 10-in. or 12-in. main line off of PCH.

An emergency supply of water for fire protection purposes would be provided at Escondido Canyon Park, Latigo Trailhead, and Malibu Bluffs (Parking Lot #1 and #3) via a proposed 10,000-gallon water tank. The tank would be kept full at all times via a connection to municipal water supplies. The tank would not be connected to on-site hose bibbs or wildland fire hydrants, but a +4-inch standpipe outflow would be provided at each tank; the tank would be identified with signage for fire protection uses and available for fire pump truck hook-up as an emergency back-up supply of water in the event of failure of the municipal water delivery system.

For Corral Canyon potable water would be provided via a 6-inch diameter connection to a water main in PCH. This water would be boosted by a small pump station located near the service vehicle access area to serve the camp areas with domestic water. This boosted water will also supply water to the 10,000 gallon storage tank at the top of the knoll above Camp Area I. The 10,000 gallon storage tank will only be used to provide water to the wildland hydrants. To augment pressure and flow to the wildland hydrants, a stand pipe and Siamese connection are provided near the service vehicle access area. This will allow a pumper truck to take municipal water and pump it into the fire water line that services the wildland hydrants in the camp area.

As a backup to firewater pressures and flows at Corral Canyon, a gas powered booster pump is being provided at a central location in Camp Area I. The booster pump would be able to connect to the domestic supply and pump into the firewater line boosting the pressure and flow into the wildland hydrants. Additionally, the booster pump would be able to also connect directly to the 10,000 gallon storage tank supply line and be fitted with a fire hose and nozzle to fight fires directly. The gas powered booster pump, hoses and nozzles will be stored in a steel container centrally located in Camp Area I. The approximate 20-horsepower booster pump would be refueled (as needed) and inspected/ tested approximately four (4) times per year by wild-fire trained personnel. The booster pump would be housed within a 2 ft by 4 ft steel container. Any necessary refueling of the pump would occur without removing it from the steel container; any accidental fuel spillage would, therefore, be contained. The booster pump would be capable of providing 120 GPM and would be located in a central location between several campsites (with surrounding 20-ft fuel modification buffers) and on a trail (with approximately 10 ft in width of fuel modification).

All fire-fighting infrastructure would be inspected and maintained on a regular basis in accordance with the proposed *Coastal Campground Maintenance Management Plan* (see *Coastal Campground Maintenance Management Plan* under 2.3.5 *Operations & Maintenance* for additional discussion).

Based upon the noted clarification to water infrastructure above, the

	<p>use of a fire truck’s pumping unit stationed at Corral Canyon could be utilized to further pressurize fire water delivered to the Camp Area wildland fire hydrants.</p> <p>On-site equipment would facilitate fire response from campers (fire extinguishers) and/or from wildfire trained specialists (fire hydrants/hoses and portable, air-powered quick attack firefighting systems). Coupled with active vegetation management in/ around camp areas, as well as other measures outlines in the FPP, patrols and fire response at Corral Canyon would be adequate.</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>K-27</p>	<p><i>This comment questions whether the citizen’s of Malibu are entitled to any protection.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
<p>K-28</p>	<p><i>This comment expresses the commenter’s support for hiking and day activities in the Santa Monica Mountains if properly monitored.</i></p> <p>RESPONSE:</p> <p>Although this comment does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR, please see response to comments A-2, A-4, B-3, K-10, K-17, and K-18 regarding monitoring of the parks and proposed campsites. CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>

K-29	<p><i>This comment expresses the commenter’s concerns with the proposed Plan.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. See, also, Topical Responses #1 and #2.</p>
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L

**From:** Laura Z. Rosenthal [mailto:drlaurazr@gmail.com]  
**Sent:** Thursday, March 18, 2010 2:45 PM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** Malibu Park Plan

Dear Ms. Tamasi,

I am writing to express my concern and reservations about the SMMC Malibu Parks Plan. I am a Malibu Park resident and do not reside next to or even within 3 -5 miles of the proposed camping sites. However, the threat of wildfires from these camping sites will force a public safety nightmare in Malibu.

L-1

I am asking you to consider alternate camping sites that would present a very low risk of fire. These would include sites closer to the beach, in a clearing, in wind protected areas and the like. I am a Clinical Psychologist and therefore have some authority when I say that many people will not follow the rules and will light campfires, cigarettes and candles, thinking that they have the right to a warm fire while they are camping in our chilly summer night air. As a Malibu Public Works Commissioner I know only too well the difficulty getting needed water reserves into Malibu during fires and how inadequate our canyon roads can be during an evacuation.

L-2

This is NOT a case of NIMBYism but clearly a case of public safety.

L-3

In addition, I STRONGLY urge you to consider the alternate road entrance (from Kanan) to Ramirez Canyon that has been talked about for many years. It is the safer and saner route to enter your property. Please do not destroy the charm and rustic nature of Ramirez Canyon. This would also go for Escondido Canyon. As Jodi Mitchell said so eloquently - "(don't) pave paradise and put up a parking lot." The addition of parking lots, signage and structures will degrade the environment and the rural feeling of these neighborhoods.

L-4

I hope that you would consider a few ideas. First, increase the minimum stay for all campers to reduce traffic. Secondly, perhaps the City and SMMC could each contribute to a "litigation fund" that could be used for Park Ranger patrols 24/7/365 instead of costly and time consuming litigation.

L-5

I look forward to talking more about alternatives and cooperation instead of the current plans.

Thank you.

Sincerely,

Laura Rosenthal  
City of Malibu Public Works Commissioner

[drlaurazr@gmail.com](mailto:drlaurazr@gmail.com)

<p><b>Letter</b> L  <b>Commenter:</b> Laura Rosenthal  <b>City of Malibu Public Works Commissioner</b>  <b>Date:</b> March 18, 2010</p>	
<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 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</p>

	<p>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.</p> <p>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.</p> <p>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.</p> <p>The FEIR 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>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>L-1</p>	<p><i>This comment expresses concern and reservations about the Park Plan and the threat of wildfires from the proposed camping sites creating a public safety nightmare.</i></p> <p>RESPONSE:</p> <p>This comment does not identify an inadequacy in the analysis,</p>

	<p>conclusions or mitigation measures in the EIR. Fire issues are adequately discussed and analyzed within Section 5.6 of the DEIR.</p> <p>Further, as noted above, in an effort to be responsive to this comment and other comments received on the DEIR, the Conservancy/MRCA is being presented with a Modified Redesign Alternative for consideration and adoption in lieu of the proposed Plan. Under this alternative, in an effort to reduce fire concerns, camping would be clustered in two locations: Corral Canyon Park and Malibu Bluffs Conservancy Property. Both of these locations have access to PCH to facilitate access to highways in a fire event, and would limit the areas of camping in order to ensure proper patrol camping areas.</p> <p>Additionally, further restrictions on the use of cooking devices and lighting have been imposed in the Fire Protection Plan for this alternative. Specifically, the use of propane stoves and flammable lighting of any kind is prohibited in the Plan area. Instead, campers would be limited to an all weather electrical outlet that could only be used for small type electrical cooking appliances. Further, the Plan now provides for semi-permanent overnight accommodations for MRCA rangers/camphosts at these campsites (at time when camping is permitted) in order to effectively patrol activities, and facilitate emergency egress to further reduce any risks from fires.</p> <p>Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p>
L-2	<p><i>This comment requests that alternative camping sites be considered closer to the beach, in a clearing, in wind protected areas.</i></p> <p><b>RESPONSE:</b></p> <p>The proposed Plan improvements have been designed in consideration of topographic, geologic and natural resource constraints, as well as minimizing conflicts with adjacent residential development. Proposed trail and park improvements include primarily low-intensity uses consisting of access trails and low-impact camp areas which are sited and designed to be noninvasive on the natural topography and to minimize impacts to sensitive habitat areas. The majority of proposed campsites would be located in existing public use areas and in</p>

	<p>previously disturbed or non-sensitive areas. Furthermore, the proposed Plan includes park program limitations and restrictions on park use to address hazardous conditions (red-flag days and flash flood warnings) and includes a detailed and site-specific Fire Protection Plan, hydrology, and geologic constraints analyses, which have evaluated potential hazards associated with the proposed development and use of the parklands to ensure that maximum public access and recreational use of the parklands can be achieved consistent with public safety needs and the project objectives.</p> <p>Further, as noted above, the Conservancy/MRCA is being presented with a Modified Redesign Alternative for consideration and adoption in lieu of the proposed Plan detailed in the DEIR. Under this alternative, in an effort to reduce fire concerns, camping would be clustered in two locations: Corral Canyon Park and Malibu Bluffs Conservancy Property. Both of these locations have access to PCH to facilitate access to highways in a fire event.</p> <p>In consideration of the discussion above, no further revisions to the DEIR would be required.</p>
<p>L-3</p>	<p><i>This comment provides a personal opinion that people would not follow park rules restricting no campfires and no smoking. The commenter also notes the difficulty in getting needed water reserves into Malibu during fires and the inadequate canyon roads during an evacuation.</i></p> <p><b>RESPONSE:</b></p> <p>This comment does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR. Water availability and access is adequately discussed/ evaluated within the Plan FPP and DEIR, Section 5.6, <i>Fire Hazards</i>.</p> <p>In an effort to be responsive to this comment and others, as noted above in response to comment L-2, the Conservancy/MRCA is being presented with a Modified Redesign Alternative that attempts to lessen fire concerns. Specifically, restrictions on the use of cooking devices and lighting has been imposed in the Fire Protection Plan for this alternative prohibiting the use of propane stoves and flammable lighting of any kind in the designated camping areas within the Plan area. Campers would be limited to an all weather electrical outlet that could</p>

	<p>only be used for small type electrical cooking appliances. Further, the Plan now provides for semi-permanent overnight accommodations for MRCA rangers/camphosts at these campsites (at times when camping is permitted) in order to effectively patrol activities, and facilitate emergency egress to further reduce any risks from fires.</p> <p>Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process. In consideration of the discussion above, no further revisions to the DEIR would be required.</p>
<p>L-4</p>	<p><i>This comment requests consideration of an alternative road entrance from Kanan Dume Road to Ramirez Canyon Park. The commenter also requests preservation of the charm and rustic nature of Ramirez and Escondido Canyons.</i></p> <p>RESPONSE:</p> <p>The MRCA has pre-planned for wildfire emergencies (see FPP), which includes a relocation component. Access improvements for Ramirez Canyon Park have been a subject of discussion with LACFD in order to ensure the safe and orderly relocation of people within that portion of the Plan area.</p> <p>The following clarification language is provided regarding the Ramirez Canyon Road and Delaplane Road Widening discussion contained within the DEIR, Section 2.0, <i>Project Description</i>:</p> <p>“The proposed Plan includes <b><u>a preliminary design</u></b> for emergency ingress/egress road improvements for the Ramirez Canyon community, <b><u>with the actual improvements being implemented consistent with Los Angeles County Fire Department’s (LACFD) final design and timing requirements.</u></b> These <b><u>preliminary design</u></b> improvements include widening of the existing access road and removal of encroachments in the road easements, as necessary, to provide 20-ft clearance for emergency ingress/egress in the canyon along Delaplane Road and Ramirez Canyon Road, per <b><u>the initial</u></b> recommendations of the Los Angeles County Fire Department, as illustrated on project plans prepared by Penfield &amp; Smith (see DEIR, <i>Figure 2-11</i>). These improvements <b><u>(or other similar alternative measures required by the appropriate fire agency consistent with Fire Code</u></b></p>

**allowances) will would** enhance overall vehicular access along Ramirez Canyon Road and ~~will~~ **would** provide for improved emergency access to and from the Ramirez Canyon corridor.”

The following clarification language is provided regarding the Via Acero Secondary Emergency Access Improvements discussion contained within the DEIR, Section 2.0, *Project Description*:

“Pursuant to **the initial** recommendations of the Los Angeles County Fire Department, the Plan also includes **a preliminary design for** improvements to Via Acero to provide secondary emergency vehicular ingress/egress for Ramirez Canyon, as identified on the Penfield & Smith Modified project plans. The secondary emergency access improvements include extending the paved portion of Via Acero ~~within~~ **generally along the path of** an existing dirt road for approximately 1,400-ft to intersect with Kanan Dume, and widening of Via Acero to 20-ft over its entire length between Kanan Dume and Ramirez Canyon Road (approximately 2,938 ft).

**Improvements to Via Acero (or other similar alternative measures required by appropriate fire agency consistent with Fire Code allowances) shall be implemented consistent with Los Angeles County Fire Department’s (LACFD) final design and timing requirements.**”

The proposed Plan requires the use of vans and shuttles for Public Outreach Programs, Events, Gatherings, Tours, and Workshops at Ramirez Canyon Park to minimize traffic trips on Ramirez Canyon Road, and requires that such vehicles travel with maximum passenger capacity and in convoys, whenever feasible. Transportation to/from Ramirez Canyon Park for these pre-arranged group activities generally requires use of 15-passenger vans, except for Public Outreach Programs that may utilize 22-passenger vans, mini-coaches or small buses limited to a maximum of 30 feet in length. These measures further serve to limit vehicle trips and maintain ample capacity on Ramirez Canyon Road at all times for responding firefighter access and adjacent property owner relocation in the event of emergency.

Based on this concern, a Modified Redesigned Alternative is being proposed for consideration and adoption by the Conservancy/MRCA.

	<p>This alternative would include a two-phased implementation of the proposed alternative plan. Phase I would include continued baseline uses (e.g., small specialized programs, training, existing offices, etc.) at Ramirez Canyon Park with only minor improvements, generally limited to 1) the retrofit of the Ranger/ Maintenance Supervisor Residence as a fire shelter, 2) the installation of monitored interior sprinklers for fire suppression in all habitable structures, 3) miscellaneous improvements (if required by the appropriate fire agency) to the Barwood, Peach House, Art Deco, and Barn structures (as specified in Appendix MRA-5 and focused on providing building ignition resistance and prevention of ember intrusion), 4) installation of new fire hydrants, 5) road improvements to Ramirez Canyon Road, Delaplane Road (if required by the appropriate fire agency), including bridge/crossing improvements, providing as great as 20-ft clearance for emergency ingress/egress in the canyon along Delaplane Road and Ramirez Canyon Road (per initial recommendations of the LACFD), as illustrated on project plans prepared by Penfield &amp; Smith (see <i>Appendix MRA-2</i>, Figure MRA-12 and/or <i>Appendix MRA-3</i>, Sheets 39-44), and 6) passive recreation-related improvements. Phase II would include a full compliment complement to Phase I specialized programs and uses, including structural retrofits to the Peach House to be used as a fire shelter, and if required by the appropriate fire agency, roadway improvements (similar to those specified for Phase I above) to Via Acero as an emergency secondary access road (see <i>Appendix MRA-3</i>, Sheets 45-49), as well as large special events (sixteen 200-guest events/year) two accessible campsites, parking improvements, and improves accessible day use areas.</p> <p>Additionally, under the Modified Redesign Alternative, new parking and camping would be eliminated from Escondido Canyon Park.</p> <p>With respect to the preservation and charm of rustic areas, the intent of the Plan, through its policies and implementation measures, is to protect, preserve, and restore the natural environment while allowing for limited coastal recreational and educational opportunities.</p> <p>In consideration of the discussion above, no further revisions to the DEIR would be required.</p>
L-5	<p><i>This comment requests consideration of requiring a minimum stay for all campers to reduce traffic and consider establishing a "litigation fund" to be</i></p>

*used to fund 24/7 Park Ranger patrols.*

**RESPONSE:**

Analysis of project-generated traffic within the DEIR *Transportation & Parking* section does not justify consideration of minimum camper stays. Relative to the “litigation fund” comment, this comment does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR.

However, in an effort to respond to this comment and other comments, the Conservancy/MRCA is being presented with a Modified Redesign Alternative that would provide for permanent overnight accommodations for MRCA rangers to further ensure that campsites are patrolled at all times that camping is permitted.

Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.

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

-----Original Message-----

From: Robert Schilling [mailto:rfs@ucla.edu]  
Sent: Thursday, March 18, 2010 5:13 PM  
To: EIRcomments@smmc.ca.gov  
Subject: Comment on Malibu Open Use Plan

March 18 2010  
Comment on Malibu Open Use Plan  
SMMC  
5750 Ramirez Canyon  
Road, Malibu, California, 90265

It is terrific to learn that SMMC is upgrading and expanding trails in the Corral Canyon area.

M-1

Hike-in camping is understandably seen as a nice addition to the present array of recreational activities in the Santa Monica Mountains. However, the planned camping sites and rules for overnight camping were selected without sufficient attention to the dangers such camping poses to Corral Canyon residents, fire personnel, and users of the Santa Monica Mountains-including overnight campers themselves.

M-2

Land in federal, state and local parks and agencies and private holdings now include more than 1000 camping sites. Why is it deemed a good idea to have more camp sites in areas that are extremely difficult to defend against fire?

M-3

It is indeed mystifying to learn that the allowance of small stoves is proposed. The November 2008 fire was started as a small campfire. A mistake with a propane stove could easily turn into an uncontrolled fire. Given that the great bulk of campers will be out for 1-2 nights, would it really harm the camping experience so much to expect them to eat cold food or bring food in thermos containers?

M-4

As I understand it, there will be patrolling by rangers/law enforcement personnel only during authorized camping days. Ironically, the camping spots will not be patrolled on the most dangerous red flag days.

M-5

During fire season, fire departments are already stretched thin. Most observers of climate change predict longer periods of dry weather, and the Santa Ana winds will remain a regular feature of our SoCal weather that escalates the danger of any small fire. What is the wisdom of adding to the danger by allowing camping in canyons that have proven to be unmanageable fire hazards? The planned campsite in the Corral and Puerco canyons is sited in tall grass adjacent to chaparral. What more needs to be said about overnight camping, especially with stoves?

M-6

Plans for one or more of the camps call for a one inch hose and fire shelters. What are the plans for teaching campers to use this equipment?

M-7

How credible is a plan that stipulates that a fire truck will be parked at a trailhead when there is no road to the campsite?

M-8

I have spent most of my life camping, and hiking. I delight in seeing hikers using Corral Canyon and the rest of the Santa Monica Mountains. These mountains merit protection and regular use by individuals from all over SoCal. They also demand respect for the fire danger that they represent. The history of Corral Canyon, Puerco Canyon and other parts of the mountain range can lead to only one conclusion: overnight camping in remote areas presents too great a fire risk.

M-9

Thank you for listening to reason.

Robert Schilling

<p><b>Letter M</b>  <b>Commenter: Robert Schilling</b>  <b>Date: March 18, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>M-1</p>	<p><i>This comment expresses support for upgrading and expanding trails in the Corral Canyon area.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
<p>M-2</p>	<p><i>This comment expresses concern with the proposed Plan's camping sites and rules for overnight camping and the insufficient attention to the dangers posed by camping to Corral Canyon residents.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, B-3, K-2, and K-10. See, also, Topical Responses #1 and #2.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>M-3</p>	<p><i>This comment states that there are more than 1,000 camping sites in the area and asks why more camp sites are needed in an area extremely difficult to defend against wildfire.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall</p>

	<p>evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
<p>M-4</p>	<p><i>This comment expresses concern with the allowance of small cooking stoves and requests that cooking stoves be prohibited within the park areas to reduce potential fire risk.</i></p> <p>RESPONSE:</p> <p>Please see responses to comments A-2 and A-4. See, also, Topical Responses #1 and #2. The Modified Redesign Alternative, which is a project alternative being presented for consideration by the Conservancy/ MRCA Boards, would prohibit the use of open-flame cooking stoves and would only allow the use of flameless, electric hot plates or similar within the proposed campground areas. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>M-5</p>	<p><i>This comment states that park areas will only be patrolled during authorized camping days and not patrolled during red flag days.</i></p> <p>RESPONSE:</p> <p>Please see response to comments K-5 and K-18. In addition, the Parks, including trails, would be closed on Red Flag Days. Such closures would implement recommendations of the County of Los Angeles Fire Department. The wildland fire-trained camp hosts present onsite whenever camping is allowed would actively monitor campsite use. Rangers and park maintenance staff would also periodically visit campsites and trails. At these supervised campsites, visitors would be told to leave on Red Flag Days. Park properties would be posted and patrolled to inform visitors of Red Flag Day closures, and notification provided that violation of the Red Flag Day closure policy would be punishable by fines up to \$1,000. In addition, on Red Flag Days, flip signs at all established trailheads would indicate that the park is closed.</p>

	<p>Twenty-four patrols would occur during all red flag events. Access to parking would be limited by the gating of facilities during red-flag events.</p> <p>Finally, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp host, or staff maintenance persons 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 this cold camp policy. Please see Topical Responses #1 and #2.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>M-6</p>	<p><i>This comment expresses concern with camping, especially with stoves in the canyons where climate change would likely increase the number of dry weather days and Santa Ana winds.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, K-8, M-4, and M-5. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>M-7</p>	<p><i>This comment requests clarification on the plans for teaching campers how to operate the one-inch hose and fire shelters located adjacent to each campsite area.</i></p> <p>RESPONSE:</p> <p>Please see response to comment K-3 and K-7.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>M-8</p>	<p><i>This comment questions the functionality of locating a fire truck at the Corral Canyon trailhead where there is no road to the campsite.</i></p>

	<p>RESPONSE:</p> <p>Please see Response K-26.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>M-9</p>	<p><i>This comment expresses support for trails in the Corral Canyon area, but expresses concern with the potential fire danger associated with the proposed overnight camping.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Nevertheless, please see Topical Response #2 above.</p>

**From:** Dennis Seider [mailto:Seider@psmlawyers.com]  
**Sent:** Friday, March 19, 2010 11:04 AM  
**To:** EIRcomments@smmc.ca.gov  
**Cc:** Christi Hogin; Sharon Barovsky; rscha@parks.ca.gov; woody\_smeck@nps.gov; G. Greg Aftergood, Esq.; Steven A Amerikaner; zev@bos.lacounty.gov; dtabak@ecco-technologies.com; ebhmalibu@aol.com; lellenberg@charter.net; Spencer Lehman; lcgconstruction@aol.com  
**Subject:** response to EIR for the proposed Malibu Public Parks Access Enhancement Plan

Ms. Judi Tomasi/Gentlepeople:

I am a resident living at 26642 Latigo Shore Dr., Malibu, CA 90265 and am the current SMMC Advisory Board member from the City of Malibu.

This plan has some excellent suggestions but suffers from a serious systemic flaw in failing to include most of the Santa Monica Mountains Conservancy area. This piecemeal and somewhat arbitrary focus on Malibu, an important but relatively small piece of the area we are mandated by law to conserve and access, greatly increases taxpayer cost, increases our workload, promising duplicative and potentially inconsistent results, adverse environmental impacts in ESHA areas when other degraded but unconsidered alternatives exist, increases the risk of fire without an analysis of proximate and more defensible locals and will likely result in wasteful and redundant actions that will not become apparent until other public lands, both in and outside Malibu, are considered later in time.

N-1

Also absent from the EIR is any analysis of hiking times to, from and between current or projected camping facilities and natural attractions like the beach or Escondido Falls or projected need or levels of utilization based on the history of the same or similar facilities already located in or close to the study area. Examples of omitted facilities whose missing distance and utilization data would be helpful in planning needed locations and capacity include the **Malibu Beach RV Park** located at 25801 Pacific Coast Hwy Malibu, Ca 90265, (a camping facility available to the public year 'round without cost to taxpayers where tent camping starts at \$18.00 per night (weekly)) and the nearby wonderful but omitted campgrounds at Leo Carrillo, Sycamore Canyon and Malibu Creek State Parks.

N-2

The EIR further suffers from trying to place some campsites in ESHA/brush areas difficult to supervise or access with life saving or fire fighting equipment, using unproven and sometimes unique designs far from existing utilities which will be expensive to install and maintain, while ignoring the alternative camping facilities we already have or might have later in time in nearby State Parks or public lands.

N-3

Examples of camp sites that are proposed in dangerous and expensive to access areas that might better serve as day use areas include Bluffs, Ramirez, Escondido and Latigo. These are areas that should be used for parking and picnicking and are readily served by trails from other areas that are better camp sites.

N-4

Alternative sites that could be used for camping, many of which were not considered in the alternatives analysis, include State Park lands at the mouth of Topanga Canyon, which is already degraded and has all of the advantages of a world class camping facility such as Leo Carrillo--viz--adjacent to a handy highway underpass leading to a world class wind surfing point break and public beach, proximity to PCH allowing emergency vehicle access and connectivity to utilities and the mountain trail system and minimizing

N-5



**N**



**N-5**

**N-6**

fire risk by placing out of the brush and close to the beach . Other public lands that could be considered for camping that have the similar advantages of traffic safety, beach and mountain access, utility and trail proximity, lack of adverse environmental impact and good emergency vehicular access, include Malibu Lagoon/Canyon State Parks (not considered in this report), Corral Canyon (an area considered but underutilized), Zuma Canyon (not considered ), Pt. Dume State Beach (aka Westward Beach--a great place for camping on the beach that could include bonfires--not considered) and Trancas Canyon (mentioned but not considered).

Finally the problem that has plagued all of Southern California for all of its recent history---wildfires starting on public lands other than as covered in the EIR, most frequently caused by downed power lines, unsupervised camping and arson--is not addressed and should be as the facilities we are planning to build and that which has already been built is at risk and saying we have placed ourselves in harms way is a poor excuse for a response.

Please provide a response to these comments.

Thank you for your kind consideration.

Dennis

Dennis J. Seider  
Of Counsel  
[seider@psmlawyers.com](mailto:seider@psmlawyers.com)

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**PARKER SHUMAKER MILLS LLP**  
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<p><b>Letter N</b>  <b>Commenter: Dennis Seider</b>  <b>Parker Shumaker Mills, LLC</b>  <b>Date: March 19, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>N-1</p>	<p><i>This comment states that the proposed Plan suffers from a serious systemic flaw in failing to include most of the Santa Monica Mountains Conservancy Area. The commenter also notes that the analysis is piecemeal and somewhat arbitrary with its focus on Malibu and should analyze alternatives with more fire defensible areas.</i></p> <p>RESPONSE:</p> <p>The Plan area is adequately described within the DEIR for purposes of analysis of impacts associated with implementation of Plan improvements.</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, are evaluated to minimize potentially significant environmental effects associated with the proposed Plan's projects, while achieving most of the Plan's objectives (see 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 added to the FEIR for consideration by the Conservancy/MRCA Boards.</p> <p>Although KGR has previously been rejected by the Coastal Commission, we offer the following additional commentary:</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 Malibu coastal zone. Although the park is partially located in the Coastal Zone, it is located beyond the first major ridgeline paralleling the sea, at the inland edge of the Coastal Zone boundary, and involves a completely different microclimate and associated resources than the parklands within the proposed Plan.</p> <p>In consideration of the discussion above, no further revisions to the DIR would be required.</p>
<p>N-2</p>	<p><i>This comment states that the DEIR fails to analyze hiking times between current and proposed camping facilities and natural attractions within the Plan area or provide projected need or levels of utilization of park areas. The commenter also notes that specific park and recreational facilities that provide camping were omitted.</i></p> <p>RESPONSE:</p> <p>An analysis of hiking times between current and proposed camping facilities and natural attractions, projected need and/or utilization of park areas in close proximity to the proposed Plan is information/analysis that is not necessary in order to assess the potential environmental impacts of the Plan. As a result, this particular</p>

	<p>aspect of the commenter’s comment addresses the merits of the proposed Plan and does not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR.</p> <p>With respect to the commenter noting that specific park and recreational facilities providing camping were omitted, the DEIR includes Table 5.14-2 that lists a number of City, County, State, and Federal park and recreational facilities located within or in close proximity to the City of Malibu that provide recreational opportunities, including camping facilities for residents and visitors. The list focuses on those facilities within the City of Malibu or in close proximity to the City.</p> <p>In consideration of the discussion above, no further revisions to the DEIR would be required.</p>
<p>N-3</p>	<p><i>This comment states that the DEIR suffers from trying to locate campsites in ESHA areas which would be difficult to supervise or access in case of an emergency. The commenter also notes that the location of the proposed campsites far from existing utilities would be expensive to install and maintain, and the DEIR should consider alternative camping facilities in nearby State Parks or other public lands.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, K-12, L-2, M-5, and N-1. The proposed campsites are located in close proximity to adjacent roadways. Impacts to ESHA while permissible under the LCP Overlay were avoided to the extent feasible; all such impacts would be adequately mitigated on a 3:1 basis. Wildfire-trained camp hosts, Park Rangers, or MRCA staff maintenance workers would be on-site at all times when camping is permitted and would be responsible for active supervision of the campsites. Utility connections are readily accessible and/or located within close proximity to the camp areas; extension of services is entirely feasible and would have limited impacts as the installation of any necessary utility lines and would generally be confined to roadways and existing and/or proposed trail corridors, which are or would be subject to regular disturbance. The Conservancy/MRCA consideration of installation and maintenance costs need not be evaluated within an EIR.</p>

	<p>In consideration of the discussion above, no further revisions to the DEIR would be required.</p>
N-4	<p><i>This comment states that the campsites proposed at Malibu Bluffs, Ramirez Canyon Park, Escondido Canyon Park, and Latigo Trailhead should be used for day use areas.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Nevertheless, please see Topical Responses #1 and #2; the MRA which is being proposed for consideration would cluster camping in primarily two locations at Corral Canyon and Malibu Bluffs Conservancy Property, which would allow for more readily accessible oversight and management, while converting Escondido Canyon Park and Latigo Trailhead to day-use areas only in contrast to the camping that is identified under the Proposed Plan.</p>
N-5	<p><i>This comment states that other camp areas, such as Topanga State Park, Leo Carrillo State Beach, Malibu Lagoon, Zuma Canyon, Point Dume State Beach, Trancas Canyon, and Corral Canyon were not considered in the alternatives analysis.</i></p> <p>RESPONSE:</p> <p>Please see response to comment N-1.</p> <p>In consideration of the above, no further revisions to the DEIR would be required.</p>
N-6	<p><i>This comment states that downed power lines, unsupervised camping, and arson were not addressed in the DEIR as the most frequently caused source of fire.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, K-2, and K-10. A Fire</p>

Protection Plan (FPP) has been prepared for each park area (see DEIR, *Appendix I* for specific details). Each FPP provides a redundant layering of prevention, protection, suppression and pre-planning methods and measures that have been proven to reduce fire risk. The combined fire protection system designed for the proposed Plan includes fuel reduction/treatment, enhancement and maintenance of ingress/egress routes, park and trail access control, options for emergency relocation and contingency sheltering areas, and restriction of open flames in all Park areas, amongst others. The system significantly reduces the fire risk associated with the Plan and the project area. Furthermore, page 5.6-33 of DEIR Section 5.6, *Fire Hazards*, provides a discussion of the fire history in Malibu, which includes information provided by the California Department of Forestry and Fire Protection on the causes of fires. This information provides background information as to the primary cause of fires in the area, which assisted in the preparation of the park specific Fire Protection Plans designed to minimize the fire risk in the park areas. See, also, Topical Response #2.

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



Bambi B Young  
 William J McCarthy  
 2050 Newell Road  
 Malibu CA 90265

March 19, 2010

SMMC  
 5750 Ramirez Canyon  
 Road, Malibu, California, 90265  
 EIRcomments@smmc.ca.gov

Re: Comment on Malibu Open Use Plan  
 Draft Environmental Impact Report SCH #2009091018 February 2010

To whom this may concern:

We are writing regarding two important omissions in the EIR draft report relating to fire-hazard mitigation for proposed camping sites in Corral Canyon Park. The plan's lack of adequate provisions for preventing unauthorized use of the hike-in campgrounds or for protecting Corral Canyon Road from fires that may originate from those sites will pose significant risks to hundreds of residents in the communities above the proposed camping locations.

O-1

Our concerns arise from the fact that the devastating Corral fire of November 24, 2007 was the direct result of a campfire set by a group of young people who were partying on park land at the top of the canyon in reckless disregard of the park's nighttime curfew and that night's severe Red Flag wind-advisory conditions. Even though Corral Canyon homeowners had warned park authorities repeatedly that such hazardous activities were common in the park during off-hour periods, there was little, if any, patrolling of the area after closing time, and so the inevitable happened. The ensuing fire destroyed 50 homes, damaged 30 additional structures, cost state and local governments \$6 million for firefighting efforts, and imposed losses of at least \$30 million on homeowners and their insurance companies. This experience contravenes the claim in the draft EIR that, "none of the historic wildfires in the Santa Monica Mountains have campfire origins" (§5.6-34).

O-2

Given this history, we have every reason to believe that the proposed campgrounds, particularly those that are not easy to see from any road, will be tempting party sites for revelers similar to those who started the Corral fire. Because such groups have shown few qualms about violating park regulations in the past, it is not likely that they will be deterred by "notification...that violation of the Red Flag day closure policy may be punishable by fines up to \$6,000" (§5.6-111). If that warning is not backed by round-the-clock patrolling during Red Flag days or other periods of closure, we believe that it is just a matter of time before illicit smoking or campfires set by inebriated youths will unleash another firestorm.

O-3

Moreover, even when the proposed facilities are open and under supervision, campers will be allowed to use propane stoves, which need to be lit, and may unintentionally generate sparks in an environment not far removed from highly combustible chaparral and high grasses. While the draft EIR describes fire shelters and other protections provided to campers in the event that they get trapped in an out-of-control wildfire, the proposed hazard mitigation measures do not satisfy the Los Angeles County Fire Department's requirement that **all** structures and places of assembly be provided with an approved emergency access road no less than 20' in width.

O-4

Brush clearance and fire extinguishers are not enough. Every resident who wishes to build in the canyon must also provide a 20'-wide access drive -- for good reason. If there is no such passage clear to the source of a fire, emergency responses will be delayed, fire trucks won't be able to reach the site, and firefighters may have to go in on foot, decreasing their effectiveness and increasing the risk that they will be injured. Any delays make it more likely that even a small fire can spread to adjacent uncleared vegetation or debris, rapidly compounding the hazard. And while (according to the EIR) campers may be able to evacuate to Pacific Coast Highway within a few minutes' hike, residents will not have that option. Whether a fire at a hike-in camp site stems from authorized or illegal activities, failure to control it immediately will threaten nearby Corral Canyon Road, which is the only route for residents to use in getting into or out of the canyon. We do not see how the EIR can be considered complete until it addresses this very real and very significant hazard.

O-5

We support the expenditure of state resources to make it possible for all California residents to enjoy our coastal views. But it is difficult to believe that ample camping facilities could not be sited on the beach or in safe inland areas. Moreover, we question the cost-effectiveness of plans that make it likely that the state will soon again have to spend millions battling blazes that were preventable. If camping is to be permitted in Corral Canyon, whose chaparral and tall grasses are highly combustible during Santa Ana conditions, then continual monitoring by state parks personnel or other law enforcement personnel is necessary, as are access roads to allow quick emergency responses. If the state does not have the resources to construct and monitor these proposed camping sites in a manner that would protect the safety of both residents and campers, then no camping should be permitted until resources have been found.

O-6

Sincerely,



William J. McCarthy & Bambi B. Young

<p><b>Letter</b>    <b>O</b>  <b>Commenter:</b>    <b>William J. McCarthy and Bambi B. Young</b>  <b>Date:</b>    <b>March 19, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>O-1</p>	<p><i>This comment expresses concern with the lack of adequate provisions in the proposed Plan for preventing unauthorized use of hike-in campgrounds or protecting Corral Canyon Road from fires that may originate from the campsites.</i></p> <p>RESPONSE:</p> <p>The proposed Plan requires all hike-in campers to register through the Plan’s proposed reservation and onsite registration system that would require campers to acknowledge and agree to all park rules including, but not limited to, the prohibition on campfires and the “cold camping” regulation.</p> <p>In addition, consistent with standard park management protocol, periodic patrols would be conducted by Park staff (e.g., Park Rangers, Camp Host) of each campsite area to ensure that all campers are registered campers and that all campers are complying with park rules and regulations.</p> <p>It should be noted further, in response to comments raised on the DEIR, the Conservancy/MRCA is being presented with a Modified Redesign Alternative. This alternative would limit camping to primarily two parks: Corral Canyon Park and Malibu Bluffs Conservancy Property in an effort to reduce fire risk. Both sites are located in close proximity to PCH to facilitate highway access in a fire event, and are considered areas with lower intensity fire behavior and near other open space areas for relocation purposes.</p> <p>Additionally, a Fire Protection Plan is included in the FEIR for this Modified Redesign Alternative and for each park area, and further and</p>

	<p>includes the following additional measures to ensure any fire risk is reduced further. First, the drop box registration system has been eliminated and all camping fees would be collected in person. Furthermore, 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 flammable devices would be strictly enforced. The only approved cooking devices would be small electrical cooking appliances compatible with the park provided all-weather electrical outlet. Further, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp hosts, or a staff maintenance person to monitor and enforce this cold camp policy and further reduce any fire risk associated with the Plan. Additionally, all MRCA rangers and camp hosts will be public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to issue citations to strictly enforce this cold camp policy.</p> <p>See, also, Topical Response #2.</p> <p>Based upon the above discussion and the analysis contained within the DEIR, no further revision to the DEIR would be required.</p>
<p>O-2</p>	<p><i>This comment expresses concern with the origin of the Corral Canyon Fire which was a result of a campfire set by a group of young people partying in the canyon and notes that the cause of the Corral Canyon Fire contravenes the claim in the DEIR that none of the historic wildfires in the Santa Monica Mountains have campfire origins.</i></p> <p>RESPONSE:</p> <p>Thank you for your comment. The MRCA acknowledges that unsupervised, illegal campfires were found to be causative of the Corral Canyon Fire located within the Santa Monica Mountains; thank you for this correction. It should be noted, however, that the Corral fire did not start “in” Corral Canyon, but in a cave on a remote ridgeline above Corral Canyon. It did have human agency, but was not in a recognized and supervised campground. The PWP proposes camping only in areas that are proximate to PCH, easily to patrol, and have none of the remote locational characteristics of the cave where the Corral Fire started. Please see Topical Response #2 for more</p>

	<p>detailed information regarding fire issues.</p> <p>It should be noted further, in response to comments raised on the DEIR, the Conservancy/MRCA is being presented with a Modified Redesign Alternative (MRA). This alternative would limit camping to primarily two parks: Corral Canyon Park and Malibu Bluffs Conservancy Property in an effort to reduce fire risk. Both sites are located in close proximity to PCH to facilitate highway access in a fire event, and are considered areas with lower intensity fire behavior and near other open space areas for relocation purposes.</p> <p>Additionally, a Fire Protection Plan is included in the FEIR for this Modified Redesign Alternative and for each park area. Please refer to FEIR Section 14.0 for evaluation of the MRA with respect to fire issues.</p> <p>In consideration of the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>O-3</p>	<p><i>This comment expresses concern with use of the proposed campgrounds by groups inclined to party and disregard park rules and regulations. The commenter notes that “around the clock” patrolling is necessary during “Red Flag” days or other periods of closure to ensure compliance with park rules and regulations.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, B-3, K-10, K-12, K-18, K-26, and M-5. Also see Topical Response #1 and #2.</p> <p>In consideration of the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>O-4</p>	<p><i>This comment expresses concern with the use of propane stoves and the potential for causing a wildfire. The comment also states that the DEIR failed to satisfy the LACFD requirement that all structures and places of assembly be provided with an approved emergency access road no less than 20-feet in width.</i></p> <p>RESPONSE:</p> <p>Please see response to comments O-1, A-2, A-4, and K-9. In addition,</p>

	<p>if required by the responsible fire agency, the proposed Plan includes emergency ingress/egress road improvements for the Ramirez Canyon community. These improvements include widening of the existing access road and removal of encroachments in the road easements, as necessary, to provide 20-ft clearance for emergency ingress/egress in the canyon along Delaplane Road and Ramirez Canyon Road, per recommendations of the Los Angeles County Fire Department, as illustrated on project plans prepared by Penfield &amp; Smith (see DEIR Section 2.0, <i>Project Description</i>, Figure 2-11). These improvements would enhance overall vehicular access along Ramirez Canyon Road and would provide for improved emergency access to and from the Ramirez Canyon corridor.</p> <p>Furthermore, DEIR Section 5.6, <i>Fire Hazards</i>, page 5.6-50 provides specific requirements for fire access roads consistent with the County and State Fire Codes. With respect to the commenter’s reference to “places of assembly”, the 2007 California Fire Code defines “assembly” as a gathering together of 50 or more persons for such purposes such as deliberation, education, instruction, worship, entertainment, drinking, dining or awaiting transportation, while the same definition is applied to “assembly building”, but with the addition that the assembly would occur in a building or portion of a building. As Ramirez Canyon Park would be the only park area proposed to include events where 50 or more persons may gather, the proposed Plan includes specific emergency fire access requirements consistent with County and State Fire requirements.</p> <p>Please also see Topical Responses #1 and #2.</p> <p>In consideration of the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>O-5</p>	<p><i>This comment states that brush clearance and fire extinguishers are not enough; access to the sources of fire must be available in order to control a fire immediately to reduce the potential threat to Corral Canyon Road, which is the only access in and out of the canyon for area residents.</i></p> <p>RESPONSE:</p> <p>Please see response to comments O-1, A-2, A-4., and K-26. In addition, the proposed Plan includes a Fire Protection Plan (see DEIR,</p>

	<p><i>Appendix I)</i> that includes site specific risk assessments for the Plan area and each park property included in the Plan. The Plan improvements include several additional fire protection features including water storage tank and wildland hydrants at each park property; fire truck storage sheds for Corral Canyon Park and Malibu Bluffs are also proposed.</p> <p>Please also see Topical Responses #1 and #2.</p> <p>In consideration of the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>O-6</p>	<p><i>This comment expresses concern with the lack of adequate provisions in the proposed Plan for monitoring the proposed campsites in a manner that would protect the safety of residents and campers. The commenter also states that no camping should be permitted until resources have been identified to provide continual monitoring by park staff or law enforcement personnel and construction of access roads to camp areas.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, K-10, K-23, K-26, O-1, O-4 and O-5.</p> <p>Please also see Topical Responses #1 and #2.</p> <p>In consideration of the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>

P

**From:** donna [mailto:daw90265@verizon.net]  
**Sent:** Saturday, March 20, 2010 8:30 AM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** over night camping

Help!

My fire insurance is over \$3700.00 to go with any main stream carrier and the others are close to \$5000. If they will take you as an insured. Our only option is CA Fair Plan and that only covers fire. You must buy separate liability policies. jAfter so many lost their homes to fire by vandals what makes you think people won't build fires?? Because they are honest ...grow up? My home survived the Corral Canyon fire but why would you choose to put us at risk again??? There are plenty of camping sites in the area. Please reconsider we fear for our homes, property, animals and neighbors.

P-I

Donna Williams  
Corral Canyon homeowner

<p><b>Letter P</b>  <b>Commenter: Donna Williams</b>  <b>Date: March 20, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>P-1</p>	<p><i>This comment expresses concern with locating campsites in Corral Canyon. The commenter states that fire insurance is difficult to obtain and why does MRCA think vandals would not build fires again in the canyon. The commenter requests reconsideration of placing campsites in Corral Canyon.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Nevertheless, please see Topical Responses #1 and #2.</p>

**From:** Steve & Michelle Poswillo [mailto:poswillo@yahoo.com]  
**Sent:** Saturday, March 20, 2010 10:55 AM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** Proposed New Campsites in Corral Canyon, Malibu, CA 90265

**Santa Monica Mountains Conservancy  
Mountains Recreation and Conservation Authority  
Attn: Ms. Judi Tasmasi  
5750 Ramirez Canyon Rd  
Malibu, CA 90265**

**Subject:** Proposed New Campsites in Corral Canyon, Malibu, CA 90265

I am writing to express my concern with the proposed public campsite to be located in Corral Canyon, Malibu, CA 90265. This canyon is an extreme fire hazard area and has been subject to multiple fires over the years that have taken at least one life, and destroyed many homes. The most recent event was the Corral fire of late 2007 that was started by reckless young men and resulted in the destruction of more than 50 homes.

Q-1

I am an active camper and enjoy the simple pleasures that this pastime provides. I do support improved public parkland access and camping at locations where it is safe to do so and appropriately managed and supervised. In my mind, and I am sure many others, camping is synonymous with fires and outdoor cooking, and while I recognize the proposed campsite is to be "cold", the reality is that this rule will be broken, and probably frequently. My own camping experiences in recent years has driven me from revisiting some of my favorite campsites due to the small, but growing number of "campers" who have a disregard for regulations and ignore orders from camp hosts.

Q-2

The proposed location of the Corral camp site is not easily accessible by emergency services and in a remote area that does not lend itself to quick containment if a fire were to start. As a resident of Corral Canyon this creates great anxiety for me and my family, as we only have one road out of the canyon, and that exit would require us to pass through any blaze moving up the canyon from a fire started in the vicinity of the proposed campsite.

Q-3

I oppose any camping in high fire hazard areas. I request that you review the current proposal to allow camping in Corral Canyon with the recognition that it will be impossible to realistically restrict the use of campfires and open flame cooking equipment, and that reality has the potential to cause devastating effect on life and property.

Q-4

Sincerely,

Steve Poswillo  
26202 Fairside Rd  
Malibu, CA 90265

<p><b>Letter Q</b>  <b>Commenter: Steve Poswillo</b>  <b>Date: March 20, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>Q-1</p>	<p><i>This comment expresses concern with locating campsites in Corral Canyon. The commenter notes the extreme fire hazard and the number of fires over the years in the area. The commenter also notes the destruction caused by the Corral Canyon Fire in 2007 by reckless young men.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Nevertheless, please see Topical Response #2.</p>
<p>Q-2</p>	<p><i>This comment expresses support for camping, but in safe areas that are appropriately managed and supervised. The commenter also notes that despite the proposed campsites being designated “cold” campsites; people will build fires, since camping is synonymous with fires and outdoor cooking.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>

	<p>Please see Topical Response #2 and response to comments A-2, A-4, and K-10.</p> <p>It should be noted further, in response to comments raised on the DEIR, the Conservancy/MRCA is being presented with a Modified Redesign Alternative. This alternative would limit camping to primarily two parks: Corral Canyon Park and Malibu Bluffs Conservancy Property in an effort to reduce fire risk. Both sites are located in close proximity to PCH to facilitate highway access in a fire event, and are considered areas with lower intensity fire behavior and near other open space areas for relocation purposes.</p> <p>Additionally, a Fire Protection Plan is included in the FEIR for this Modified Redesign Alternative and for each park area, and further and includes the following additional measures to ensure any fire risk is reduced further. First, the drop box registration system has been eliminated and all camping fees would be collected in person. Furthermore, 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 flammable devices would be strictly enforced. The only approved cooking devices would be small electrical cooking appliances compatible with the park provided all-weather electrical outlet. Further, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp hosts, or a staff maintenance person to monitor and enforce this cold camp policy and further reduce any fire risk associated with the Plan. Additionally, all MRCA rangers and camp hosts will be public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to issue citations to strictly enforce this cold camp policy.</p>
<p>Q-3</p>	<p><i>This comment expresses concern with the lack of accessibility by emergency services in case of a fire to the proposed campsites at Corral Canyon Park.</i></p> <p>RESPONSE:</p> <p>Please see response to A-2, A-4, K-10, and K-26.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>

Q-4	<p><i>This comment expresses the author's opposition to any camping in high fire hazard areas and requests MRCA reconsider the proposed Plan to include campsites in Corral Canyon Park.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the "lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response." This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA's decision-making body. Please, also, see response to comment Q-2 and Topical Response #1 and #2.</p>
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**From:** Derek Tabak [mailto:kingfasteners@verizon.net]  
**Sent:** Saturday, March 20, 2010 5:15 PM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** response to EIR for the proposed Malibu Public Parks Access Enhancement Plan

Ms. Judi Tomasi/Gentlepeople:

I am a resident living at 2842 Sea Breeze Dr., Malibu, CA 90265 and have lived at this address for 35 years.

This plan has some excellent suggestions but suffers from a serious systemic flaw in failing to include most of the Santa Monica Mountains Conservancy area. This piecemeal and somewhat arbitrary focus on Malibu, an important but relatively small piece of the area as a Malibu resident we are mandated by law to conserve and access, greatly increases taxpayer cost, increases our workload, promising duplicative and potentially inconsistent results, adverse environmental impacts in ESHA areas when other degraded but unconsidered alternatives exist, increases the risk of fire without an analysis of proximate and more defensible locals and will likely result in wasteful and redundant actions that will not become apparent until other public lands, both in and outside Malibu, are considered later in time.

R-1

Also absent from the EIR is any analysis of hiking times to, from and between current or projected camping facilities and natural attractions like the beach or Escondido Falls or projected need or levels of utilization based on the history of the same or similar facilities already located in or close to the study area. Examples of omitted facilities whose missing distance and utilization data would be helpful in planning needed locations and capacity include the **Malibu Beach RV Park** located at 25801 Pacific Coast Hwy Malibu, Ca 90265, (a camping facility available to the public year 'round without cost to taxpayers where tent camping starts at \$18.00 per night (weekly)) and the nearby wonderful but omitted campgrounds at Leo Carrillo, Sycamore Canyon and Malibu Creek State Parks.

R-2

The EIR further suffers from trying to place some campsites in ESHA/brush areas difficult to supervise or access with life saving or fire fighting equipment, using unproven and sometimes unique designs far from existing utilities which will be expensive to install and maintain, while ignoring the alternative camping facilities we already have or might have later in time in nearby State Parks or public lands.

R-3

Examples of camp sites that are proposed in dangerous and expensive to access areas that might better serve as day use areas include Bluffs, Ramirez, Escondido and Latigo. These are areas that should be used for parking and picnicking and are readily served by trails from other areas that are better camp sites.

R-4

Alternative sites that could be used for camping, many of which were not considered in the alternatives analysis, include State Park lands at the mouth of Topanga Canyon, which is already degraded and has all of the advantages of a world class camping facility such as Leo Carrillo--vie--adjacent to a handy highway underpass leading to a world class wind surfing point break and public beach, proximity to PCH allowing emergency vehicle access and connectivity to utilities and the mountain trail system and minimizing fire risk by placing out of the brush and close to the beach . Other public lands that could be considered for camping that have the similar advantages of traffic safety, beach and mountain access, utility and trail proximity, lack of adverse environmental impact and

R-5



**R**

good emergency vehicular access, include Malibu Lagoon/Canyon State Parks (not considered in this report), Corral Canyon (an area considered but not utilizing a more appropriate location), Zuma Canyon (not considered ), Pt. Dume State Beach (aka Westward Beach--a great place for camping on the beach that could include bonfires--not considered) and Trancas Canyon (mentioned but not considered).

↑  
R-5

Finally the problem that has plagued all of Southern California for all of its recent history--- wildfires starting on public lands other than as covered in the EIR, most frequently caused by downed power lines, unsupervised camping and arson--is not addressed and should be as the facilities we are planning to build and that which has already been built is at risk and saying we have placed ourselves in harms way is a poor excuse for a response.

R-6

Please provide a response to these comments.

Best regards,

Derek S. Tabak



King Industrial Products Inc.

Tel: 818 222 2133

Fax: 818 222 2366

<p><b>Letter R</b>  <b>Commenter: Derek Tabak</b>  <b>Date: March 20, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>R-1</p>	<p><i>This comment states that the proposed Plan suffers from a serious systemic flaw in failing to include most of the Santa Monica Mountains Conservancy Area. The commenter also notes that the analysis is piecemeal and somewhat arbitrary with its focus on Malibu and should analyze alternatives with more fire defensible areas.</i></p> <p>RESPONSE:</p> <p>Relative to consideration of Alternatives, please see response to comment N-1. Additional comments do not identify an inadequacy in the analysis, conclusions or mitigation measures in the EIR.</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Nevertheless, please see Topical Responses #1 and #2.</p>
<p>R-2</p>	<p><i>This comment states that the DEIR fails to analyze hiking times between current and proposed camping facilities and natural attractions within the Plan area or provide projected need or levels of utilization of park areas. The commenter also notes that specific park and recreational facilities that provide camping were omitted.</i></p> <p>RESPONSE:</p> <p>Please see response to comment N-2.</p>

	<p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>R-3</p>	<p><i>This comment states that the DEIR suffers from trying to locate campsites in ESHA areas which would be difficult to supervise or access in case of an emergency.</i></p> <p><i>The commenter also notes that the location of the proposed campsites far from existing utilities would be expensive to install and maintain, and the DEIR should consider alternative camping facilities in nearby State Parks or other public lands.</i></p> <p>RESPONSE:</p> <p>Please see response to comment N-3.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>R-4</p>	<p><i>This comment states that the campsites proposed at Malibu Bluffs, Ramirez Canyon Park, Escondido Canyon Park, and Latigo Trailhead should be used for day use areas.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Nevertheless, please see Topical Responses #1 and #2.</p> <p>A Modified Redesign Alternative has been proposed for consideration and adoption by the Conservancy/MRCA. Under this alternative, concentrated campsites have been developed through a clustering of campsites limited primarily to two parks: Corral Canyon Park and the Malibu Bluffs Conservancy Property. Further, under this alternative, no campsites are proposed at Escondido Canyon Park, the Latigo Trailhead Property and remote camping locations have been removed from Ramirez Canyon Park.</p>

<p>R-5</p>	<p><i>This comment states that other camp areas, such as Topanga State Park, Leo Carrillo State Beach, Malibu Lagoon, Zuma Canyon, Point Dume State Beach, Trancas Canyon, and Corral Canyon were not considered in the alternatives analysis.</i></p> <p>RESPONSE:</p> <p>Please see response to comment N-5.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>R-6</p>	<p><i>This comment states that downed power lines, unsupervised camping, and arson were not addressed in the DEIR as the most frequently caused source of fire.</i></p> <p>RESPONSE:</p> <p>Please see response to comment N-6.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>

**S**

**From:** innerbeach@aol.com [mailto:innerbeach@aol.com]  
**Sent:** Sunday, March 21, 2010 8:43 PM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** OPT OUT

Please do not allow overnight camping in the Malibu hills. We cannot endure another firestorm!!!

| **S-I**

Michael Manheim and Janus Cercone  
20 year residents  
Malibu

<p><b>Letter S</b>  <b>Commenter: Michael Manheim and Janus Cercone</b>  <b>Date: March 21, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>S-1</p>	<p><i>This comment expresses concern with overnight camping in the Malibu Hills and requests that overnight camping not be allowed.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p> <p>Furthermore, in response to comments raised on the DEIR, the Conservancy/MRCA is being presented with a Modified Redesign Alternative. This alternative would limit camping to primarily two parks: Corral Canyon Park and Malibu Bluffs Conservancy Property in an effort to reduce fire risk. Both sites are located in close proximity to PCH to facilitate highway access in a fire event, and are considered areas with lower intensity fire behavior and near other open space areas for relocation purposes.</p> <p>Under the Modified Redesign Alternative, additional widening of roads would provided (as required by the appropriate fire agency) in order to ensure adequate fire access.</p> <p>Additionally, a Fire Protection Plan is included in the FEIR for this Modified Redesign Alternative and for each park area, and further includes the following additional measures to ensure any fire risk is reduced further. First, the drop box registration system has been</p>

eliminated and all camping fees would be collected in person. Furthermore, 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 flammable devices would be strictly enforced. The only approved cooking devices would be small electrical cooking appliances compatible with the park provided all-weather electrical outlet. Further, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp hosts, or a staff maintenance person to monitor and enforce this cold camp policy and further reduce any fire risk associated with the Plan. Additionally, all MRCA rangers and camp hosts will be public officers designated pursuant to the MRCA Park Ordinance as authorized by the Public Resources Code and would be able to issue citations to strictly enforce this cold camp policy.

See, also, Topical Responses #1 and #2.

-----Original Message-----

From: BD Weiss [mailto:taskers.alley@gmail.com]  
Sent: Sunday, March 21, 2010 10:01 PM  
To: EIRcomments@smmc.ca.gov  
Subject: Comments on Draft EIR for Malibu Camping Plan

To say I am disheartened by the draft EIR would be a gross understatement. Now before I get into all the flaws let me state that I am a huge fan of camping and trail access. As a matter of fact I could not be happier with the proposed trail additions to Corral Canyon. The camping concerns me greatly though. I happen to live in Corral Canyon's Malibu Bowl neighborhood. I have seen firsthand what unsupervised camping and fires lead to. Corral Canyon lost about 20% of its homes to an unsupervised fire in November 2007.

T-1

I have stated from the onset of this debate that is the campsites were properly supervised I'd have no argument with them. That was before I found out the planned location of your "hike in" campsites. It surprises me that Dudek, having worked on CWPPs are suddenly so ignorant of wildfire issues and planning. The following is a short list of the issues I have with this misguided camping plan:

T-2

. "Cold Camping" as defined by Dudek allows propane stoves, which, last I checked, emit a flame. Let's face it, any flame in this area under dry and windy conditions is asking for a disaster. Red flag conditions are not the only dangerous periods for fires in the Santa Monica Mountains. You know this as well as I do.

T-3

. The guidelines for patrolling only require supervision during authorized camping. Camping during Red Flag is not to be authorized therefore there will not be patrols during Red Flag conditions!

Having watched you develop this plan I have been confused by what the SMMC considers adequate supervision. I hike the trails in this canyon regularly. I have never met anyone from the SMMC except when ticketing cars in the parking lot. I've seen unsupervised hikers during severe Santa Anna conditions. This morning (3/21) I hiked the proposed campsite and found mounds of trash and cigarette butts. If this exists now how can you expect anyone to believe things will improve when you allow people to spend the night without rangers IN THE CAMPGROUND!

T-4

. The campsite planned between Corral and Puerco is located in an area covered in tall grass and chaparral. These are quickly ignited, fast burning fuels. A fire beginning in these campsites would spread uphill to an area with poor fire road access. Unless you plan to clear hundreds of square meters of brush and campers unfortunate enough to be on the scene of a fire would likely perish.

T-5

. The campsite planned as a "hike in" site is planned for Corral Canyon near the creek about a half mile up from Malibu Seafood. There will not be road access to this site to facilitate patrolling or fire response.

T-6

Although you plan a one inch hose reel for this camp, do you really think this will help? The idiots that burned our canyon in Nov 07 couldn't be burdened to phone 911. Does anyone really think they would have used a hose if one were available? Lets face it simply planning a hose reel is a panacea NOT a solution. If the SMMC believes a hike in camp is so urgently required is such an ill chosen spot why won't you commit to a 24/7 ranger presence in this campsite?

T-7

. SMMC has plans for Fire Shelters at these campsites. Who is going to teach people how to use these shelters? A friend of mine lost all she owned in the 07 fire. A good amount of her belongings were in the same type container you propose to use as a fire shelter. I'm thinking this is not such a good idea.

T-8

. I must admit, that Dudek worked on a CWPP confuses me. The planned location for the hike in campsite will destroy a beautiful meadow. You can't have flowers and a spot for campsites in the same exact spot can you? Now if we accept that "developing" this spot is required for the greater public good please explain to everyone in a rational way how this spot makes sense. Without road access this site will not be patrolled at night. Without road access this spot will not be defensible in the event of wildfire. If

T-9



T



T-9

you do put in a road you destroy the site. Oh, I quite forgot to ask, how do you justify the proximity to the stream? For an organization dedicated to preserving wild lands you seem very determined to destroy this one. Why is that?

T-10

Did anyone at the SMMC ever actually read the Dudek proposal? I don't mean to be flippant, it's just that the things I point out are so painfully obvious.

T-11

I have to be honest, as a resident of Malibu Bowl the location of the hike in site horrifies me. An accidental fire at this site under normal conditions will likely burn across Corral Canyon Rd in 10 minutes. The LA County Fire Dept takes 15 minutes to respond to Malibu Bowl in perfect conditions. So, you are proposing a site that, should a fire start, will cut access for emergency response as well as block egress to every resident of Corral Canyon. Does this seem responsible to you? Do you really believe your organization is absolutely immune from lawsuits? Should an accident cost the state another \$7M in fire fighting and Insurance companies \$500M I don't think you will walk away unscathed. This planning is happening in full public view. Again, I am aghast that Dudek sold you this "bill of goods".

T-12

The argument the SMMC made to the Coastal Commission was fallacious.

Malibu has more than 1,000 campsites operated by federal, state and local agencies and private operators. Can anyone tell us why we need another one

T-13

-- in the most dangerous, fire-prone canyon in California no less. It is obvious that camping in Corral Canyon has nothing to do with public need.

I'd love to find out what is really driving this.

Where are the funds coming from to create, maintain and supervise this new site? We are in a budget crisis. How much it will cost the Fire Department to deal with another Corral Canyon conflagration? We would think the Governor and other state officials would be looking for ways to reduce the possibility of fires, not increase their likelihood. But that is just what the SMMC would be doing by introducing overnight camping into the dangerous canyon areas above Malibu.

T-14

All of Corral Canyon is categorized as a "Very High Fire Hazard Severity Zone" with a very high chaparral "fuel load." Threatening fines for smokers and campfires is useless when no effective patrolling is included. As a reminder, you currently have many cigarette butts already on your property. Patrolling is clearly insufficient. The SMMC has not proposed any additional patrolling. How do you justify this?

T-15

The SMMC plans to put up a shelter and park a fire truck at the trailhead (Malibu Seafood). This doesn't make much sense if there is no road to the campsite! Wouldn't it make more sense to locate the fire truck and supervision AT THE CAMPSITE?

T-16

This list is far from complete but then I am only a state resident. Coming up with a thorough analysis is not my job, it was Dudek's job and they blew it.

T-17

Brian Weiss  
LA County Resident

<p><b>Letter T</b>  <b>Commenter: Brian Weiss</b>  <b>Date: March 21, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>T-1</p>	<p><i>This comment expresses support in general for camping and trail access. However, the author expresses great concern with the proposed camping at Corral Canyon Park, where unsupervised camping and fire led to the destruction of about 20% of the homes in the area.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Nevertheless, please see Topical Response #2.</p> <p>In response to a number of concerns and issues raised, a Modified Redesign Alternative has been proposed for consideration by the Conservancy/MRCA. 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 FEIR includes an analysis of the MRA as well as a MRA Fire Protection Plan.</p>
<p>T-2</p>	<p><i>This comment expresses concern with the proposed “hike-in” campsites and lack of supervision of these campsites.</i></p>

	<p>RESPONSE:</p> <p>Please see response to A-2, A-4, and K-10. Also, see Topical Responses #1 and #2. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>T-3</p>	<p><i>This comment expresses concern with the potential fire hazard from the allowed use of propane stoves at the proposed campsites.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, and K-10. The Fire Protection Plan (FPP) (see DEIR, Appendix I) 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. As noted in the FPP, in addition to the required management of vegetation for a 20-foot radius around campsites and the presence of multiple fire protection apparatus within the camp areas, hospitality stations with fire safe shields will provide a stable, safe, non-flammable cooking surface for approved camp stoves. All campsites will have permeable, non-flammable surfaces (dirt, decomposed granite, etc.). Any dropped camp stove, therefore, would not result in the ignition of a grass fire that could spread.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p> <p>However, in response to a number of concerns and issues raised, a Modified Redesign Alternative has been proposed for consideration by the Conservancy/MRCA. 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</p>

	<p>permitted at the location. The Final EIR includes an analysis of the MRA as well as a MRA Fire Protection Plan.</p> <p>See, also, Topical Responses #1 and #2.</p>
<p>T-4</p>	<p><i>This comment states that the proposed Plan’s guidelines for patrolling campsites would only occur during Red Flag conditions.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, B-3, K-10, and T-3. In addition, the Fire Protection Plan (FPP) (see <i>Appendix I</i>) 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; the FPP includes a discussion of site specific fire protection measures that address red flag conditions. The DEIR <i>Project Description</i> (Section 2.0) further describes patrolling efforts in the “Ranger Services, Patrols, and Enforcement” section. All park rules and regulations will be enforced consistently by park rangers and designated staff. Twenty-four hour patrols will be conducted during red flag conditions. Patrolling and supervision would, therefore, be adequate.</p> <p>Furthermore, MRCA Ordinance No. 1-2005 includes Section 3.1, which states that parks are closed from sunset to sunrise unless different hours are otherwise posted. No person shall be present in or remain in or upon parkland during hours that the property is closed. Park Rangers conduct periodic patrols of MRCA parks from 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.</p> <p>Finally, the Modified Redesign Alternative would provide permanent overnight accommodations for wildland fire-trained MRCA rangers, camp host, or staff maintenance persons 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 this cold camp policy. Please see Topical Responses #1 and</p>

	<p>#2.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>T-5</p>	<p><i>This comment states that the proposed campsite planned between Corral and Puerco is located in an area covered in tall grass and chaparral, which is quickly ignited due to fast burning fuels. The commenter also notes that a fire beginning at this campsite would spread uphill to an area with poor fire road access and campers unfortunate enough to be onsite would likely perish.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, B-3, K-6, K-8, K-10, and K-26. Vegetation in/ around camp areas would be actively managed to prevent the ignition/ spread of wild fire. See, also, Topical Responses #1 and #2.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>T-6</p>	<p><i>This comment expresses concern with the proposed “hike-in” campsite (Camp Area 2) planned for Corral Canyon Park where no access would be available for patrolling or fire response.</i></p> <p>RESPONSE:</p> <p>Please see response to comments K-7 and K-10. Furthermore, trail width is a minimum of 5 feet to Corral Camp Area 2. Campsites are located approx. 1,200 ft from PCH. Access via foot, bike, horse, or ATV is possible at this location. At an average walking speed of 4 feet per second, it would be a five minute hike. In the event of an emergency, a more rapid response would be anticipated. On-site equipment would facilitate fire response from campers (fire extinguishers) and/or from wildfire trained specialists (fire hydrants/ hoses and portable, air-powered quick attack firefighting systems). Coupled with active vegetation management in/ around camp areas, as well as other measures outlined in the FPP, patrols and fire response at Corral Canyon (Camp Area 2) would be adequate.</p> <p>Further, a Modified Redesign Alternative has been proposed for</p>

	<p>consideration by the Conservancy/MRCA. Under the MRA, Corral Canyon (Camp Area 2) would be a day-use picnic area only; no campsites or restrooms would be provided in this area of the Park.</p> <p>Please see Topical Responses #1 and #2.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>T-7</p>	<p><i>This comment expresses concern with the proposed “hike-in” campsite (Camp Area 2) in Corral Canyon Park and the effectiveness of the proposed one-inch hose to combat a fire. The commenter also states that should a campsite be located in this area, MRCA should commit to 24/7 ranger presence at this campsite.</i></p> <p>RESPONSE:</p> <p>Please see response to comments K-12, K-17, T-4, and T-6.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>T-8</p>	<p><i>This comment questions the functionality of the location of fire shelters at the proposed campsites and who is going to teach people how to use the shelters.</i></p> <p>RESPONSE:</p> <p>Please see response to K-26. The FPP addresses required vegetation management in/around the fire shelters which is a critical component to enhancing the safety of these structures. The FPP includes measures to educate registered visitors on the use of such structures as well as MRCA ranger training/ supervision of the use of such structures (“Temporary On-site Sheltering – Contingency Option”). It should be noted that the optional fire shelters are considered a contingency, “last-resort” alternative, and that all efforts would be first directed to relocate visitors away from harm. See, also, Topical Response #2.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>T-9</p>	<p><i>This comment expresses confusion with the location of the proposed “hike-</i></p>

	<p><i>in” campsite (Camp Area 2) in Corral Canyon Park, which would destroy a beautiful meadow, and without road access, the campsite would not be patrolled at night or defensible in the event of a wildfire.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, and L-2. Site selection was guided by PWP policies (see DEIR, <i>Appendix C</i>, Section 4.2) intended to minimize impacts to Environmentally Sensitive Habitat Areas (ESHAs) to the greatest extent feasible while also providing for public coastal recreation. The majority of the Plan’s park-specific improvements have been sited in previously disturbed areas. This is the case for a substantial portion of Corral Camp Area 2 (see Tables 5.4-17, 5.4-18 and Figure 5.4-5i3c); road access is not required to this camp area (see Response to Comment T-6).</p> <p>Further, a Modified Redesign Alternative has been proposed for consideration by the Conservancy/MRCA. Under the MRA, Corral Canyon (Camp Area 2) would be a day-use picnic area only; no campsites or restrooms would be provided in this area of the Park. See, also, Topical Response #2.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>T-10</p>	<p><i>This comment questions the proposed location of the Corral Canyon Park improvements in close proximity to the stream.</i></p> <p>RESPONSE:</p> <p>Please see response to comment L-2. In addition, the DEIR includes Mitigation Measure BIO-1.15 which requires campsites to be located a minimum 100 feet from the top of bank of all streams or from the outer edge of riparian vegetation, whichever is the most protective. Reduced stream corridor setbacks may be permitted for low-impact campsites if a qualified biologist or environmental resource specialist determines, to the satisfaction of the reviewing body, that potential impacts to riparian corridors will be avoided or appropriately mitigated and that there is no alternative site design to meet these setback requirements given other environmental constraints such as sensitive habitat, archaeological resources or topography.</p>

	<p>Furthermore, mitigation measures (see DEIR Section 5.4, <i>Biological Resources</i>) are required where limited impacts would result in the implementation of the project. Of the approximately 1,800 acres included within the PWP, a little over 21 acres of impacts would result to sensitive vegetation communities, which is approximately 1% of the Plan area. Mitigation for these impacts would occur at a 3:1 ratio of mitigation to impacts. The majority of wildlands would be preserved under the PWP.</p> <p>Further, a Modified Redesign Alternative has been proposed for consideration by the Conservancy/MRCA. Under the MRA, Corral Canyon (Camp Area 2) would be a day-use picnic area only; no campsites or restrooms would be provided in this area of the Park. See, also, Topical Responses #1 and #2.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
T-11	<p><i>This comment questions whether anyone at the SMMC read the Dudek proposal.</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>
T-12	<p><i>This comment expresses concern with the proposed “hike-in” overnight camping site (Camp Area 2) in Corral Canyon Park and the limited emergency access to Corral Canyon Road residents in the event of a wildland fire.</i></p> <p>RESPONSE:</p> <p>DEIR Section 5.6, <i>Fire Hazards</i>, speaks to fire modeling results and impacts associated with the plan. Residents living off of Corral Canyon Road (see DEIR Figures 5.6-6 and 5.6-7) live in an area designated by the Los Angeles County Fire Department as a “Very High Fire Hazard Severity Zone,” which has been subject to fire several times over the past 100 years. Any fire risk relative to limited emergency access at Corral Canyon Road is a part of the existing environmental setting/</p>

	<p>baseline. Use of existing trails at Corral Canyon, as well as access along PCH and Corral Canyon Road by local residents and visitors is an existing condition under which irresponsible and/or illegal behavior could result in catastrophic consequences. The FPP improves upon existing MRCA/ Conservancy fire policies and management strategies and will reduce the risk of wildfire within the Plan area, will improve the ability to safely relocate people from the area during a wildfire event (or temporarily shelter them under emergency conditions), and will improve the ability to fight fires on the properties and protect PEP and neighboring resources irrespective of the cause or location of ignition.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p> <p>Further, a Modified Redesign Alternative has been proposed for consideration by the Conservancy/MRCA. Under the MRA, Corral Canyon (Camp Area 2) would be a day-use picnic area only; no campsites or restrooms would be provided in this area of the Park.</p>
<p>T-13</p>	<p><i>This comment states that the argument made by SMMC to the California Coastal Commission was fallacious and that Malibu has more than 1,000 campsites operated by federal, state, and local agencies and private operators. The commenter also questions why additional campsites are needed, particularly in a high fire hazard canyon, where it has nothing to do with public need.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
<p>T-14</p>	<p><i>This comment asks where the funds are coming from to create, maintain, and supervise the proposed campsites in Corral Canyon Park. The commenter also states that the State is in a budget crisis.</i></p> <p>RESPONSE:</p>

	<p>DEIR Section 2.3.5 (Operations &amp; Maintenance) within the <i>Project Description</i> provides information on operations and maintenance; project funding/ financial feasibility need not be analyzed within the context of CEQA.</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
<p>T-15</p>	<p><i>This comment states that Corral Canyon is designated a “Very High Fire Hazard” area and threatening fines for smokers and campfires without effective patrolling would be useless. The commenter also states that existing patrolling is insufficient and that the proposed Plan has not included additional patrolling as part of the Plan.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, B-3, K-10, K-12, K-17, and T-4. See, also, Topical Response #2.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>T-16</p>	<p><i>This comment expresses concern with the placement of a fire shelter and fire truck at the Corral Canyon Park Trailhead, when there is no road access to the campsites. The commenter also states that it would make more sense to locate the fire truck and supervision at the campsite (Camp Area 2).</i></p> <p>RESPONSE:</p> <p>Please see response to comments K-6, K-26, and T-6. Locating a fire truck shed at Camp Area 2 would result in unacceptable impacts to ESHA. Resources and measures identified on-site and in near proximity (as outlined in the FPP) would provide adequate fire prevention and protection.</p> <p>Further, a Modified Redesign Alternative has been proposed for consideration by the Conservancy/MRCA. Under the MRA, Corral</p>

	<p>Canyon (Camp Area 2) would be a day-use picnic area only; no campsites or restrooms would be provided in this area of the Park. See, also, Topical Responses #1 and #2.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>T-17</p>	<p><i>This comment questions the thoroughness of the analysis provided in the DEIR.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Nevertheless, please see Topical Response #2.</p>

**From:** Ebhmalibu@aol.com [mailto:Ebhmalibu@aol.com]  
**Sent:** Monday, March 22, 2010 2:06 AM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** Comment to EIR For Malibu Parks Public Access Enhancement Plan

I wish to comment on the above EIR:

The EIR failed to consider or adequately deal with the significant affects of allowing overnight camping, albeit so called "cold camping" in the areas covered by the Plan. The EIR has failed to balance the moderate benefit of access to a few overnight campsites verses the risks to the environment, wildlife, residents, visitors and the economics of the Malibu area and the State of California.

U-1

I have been a resident of Malibu for over 30 years and live on the beach between Corral and Latigo Canyons (two areas where campsites are planned). I have been through virtually every fire in Malibu. The last one, started by an illegal campfire, in Corral Canyon (where campsites are planned) quickly involved both Corral and Latigo Canyons causing a wall of fire to come down the hill, and embers to jump Pacific Coast Highway threatening houses on the beach. (See photographs attached taken from my house and my block on Latigo Shore Drive).

U-2

Thus I suggest that the EIR must consider or more fully consider the following specific matters:

- While the plan calls for one ranger to be on duty in any park when camping occurs, it is not clear that there will be sufficient budgeting to pay for such a ranger in the future. It is also unrealistic to assume one lone ranger can patrol the area of the park on a constant basis. Other issues can occupy a Ranger's time. No sufficient contingency plan is provided or considered.

U-3

-Individuals, at night, when there is less visibility, are likely to smoke, for example, after dinner, and fall asleep with burning cigarettes. There is also no guarantee that overnight campers will not start a fire with the use of candles or illegal fires. There is no assurance that such individuals faced with an accidentally started fire, will have the training, knowledge or will to use whatever fire suppression equipment is close to the campsites. Most likely they will simply flee the area. Thus the EIR failed to consider or propose any contingency plan in such event. All the fire suppression equipment in the world will not help if unused.

U-4

-It is unrealistic to believe that overnight camping will not disturb wildlife. For example, from my house on the other side of the highway, we can hear the night calls of coyotes hunting their prey freely within the

U-5



U

open area. The presence of humans will either deter wandering animals, used to exploring and feeding at night without restriction, or if it does not, the EIR fails to consider the danger to the humans and animals if we accept the statement that animals will be unaffected and thus could freely roam through campsites. Since many individuals these days carry firearms, there has been no consideration of what would happen if, in the middle of the night, a prowling mountain lion were to come upon a "cold" campsite. Since, by definition, there would be no fire to scare the animal away, it is likely that a disastrous confrontation might take place risking the lives of both animal and human. No consideration was given to that scenario.



U-5

-The EIR failed to balance the risks that simply one spark can have on the entire Santa Monica Mountains. The areas planed for campsites are rife with flammable brush which can be ignited by a single spark from a match lighting a cigarette, a camping stove or a candle, even if there are not "open flames" allowed. As the Conservancy should know, the affects of a fire are devastating. Not only can the destruction to the land, wildlife and human life and property take years to repair, thus restricting access to the Santa Monica Mountains resource by countless hikers and nature lovers, but the economic strain on the State of California caused by fighting such fires has not been taken into account in balancing the equities of this plan.

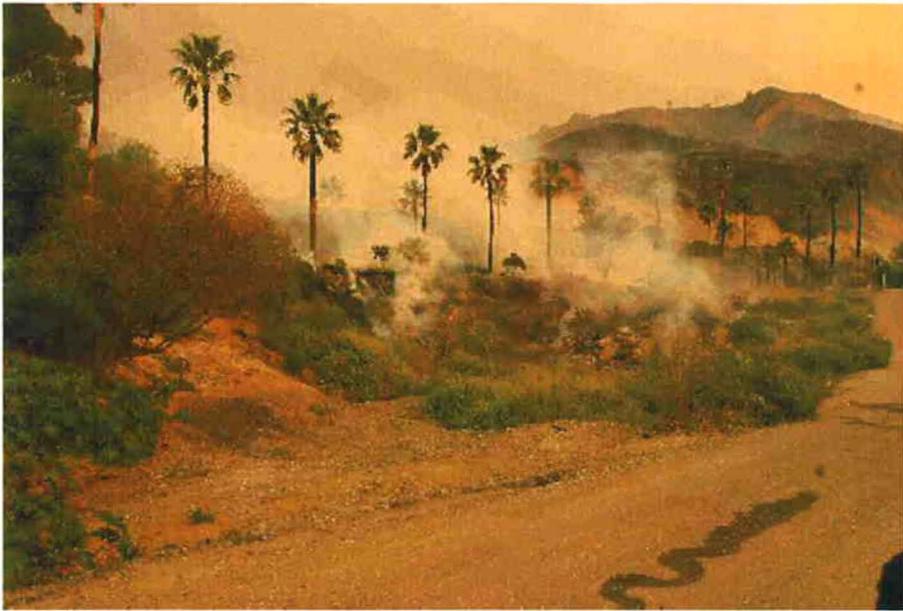
U-6

In conclusion, while there are many good things about the Access Enhancement Plan, I submit that the benefit to a small number of individuals of adding a few campsites, laid against the danger to the State, the environment, wildlife and access of individuals to the entire Santa Monica Mountains if a fire is accidentally or intentionally started, have to be considered much more carefully by the authors of the EIR.

U-7

I think you for your consideration.

E. Barry Haldeman  
26674 Latigo Shore Drive  
Malibu, CA 90265  
telephone: (home) 310/457-4903  
(office) 310/201-3569



<p><b>Letter U</b>  <b>Commenter: E. Berry Haldeman</b>  <b>Date: March 22, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>U-1</p>	<p><i>This comment states that the EIR failed to consider or adequately address the significant affects of allowing overnight camping in the Plan area. The commenter also states that the EIR failed to balance the moderate benefits of access to a few overnight campsites versus the risks to the environment, wildlife, residents, visitors, and economics of the City of Malibu and State of California.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2 and A-4. In addition, DEIR subsection 5.6.2 of Section 5.6, <i>Fire Hazards</i>, provides a detailed impact analysis of the proposed Plan that includes overnight camping. The proposed Plan includes Fire Protection Plans (FPPs) for each of the five park areas, which provide detailed analysis of the proposed Plan improvements and the Plan’s potential risk for wildfire, and its impact on the fire response capabilities. The FPPs provide a redundant layering of prevention, protection, suppression and pre-planning methods and measures that have been proven to reduce fire risk. The combined fire protection system designed for the proposed Plan includes fuel reduction/treatment, enhancement and maintenance of ingress/egress routes, park and trail access control, options for emergency relocation and contingency sheltering areas, and restriction of open flames in all Park areas, amongst others. The system significantly reduces the fire risk associated with the Plan and the project area. Furthermore, DEIR subsection 5.4.2 of Section 5.4, <i>Biological Resources</i>, provides a detailed impact analysis of the potential for the Plan’s proposed improvements to directly or indirectly impact sensitive vegetation communities and populations of native and/or sensitive plant and animal species. Discussion of project-related social or economic damage is not required by CEQA.</p>

	<p>In response to oral and written comments, however, a Modified Redesign Alternative has been proposed for consideration and adoption by the Conservancy/MRCA. Features have been added in the MRA to further address the community’s environmental 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 FEIR includes an analysis of the MRA as well as a MRA Fire Protection Plan. See, also, Topical Responses #1 and #2.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>U-2</p>	<p><i>This comment states that the author has been a resident for over 30 years in the area and has been through virtually every fire in Malibu, including the Corral Canyon Fire that quickly came down Corral Canyon threatening his house on the south side of Pacific Coast Highway.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Nevertheless, please see Topical Response #2.</p>
<p>U-3</p>	<p><i>This comment requests clarification as to the funding to pay for park rangers and questions whether one lone ranger can patrol the area of the park on a constant basis.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, B-3, K-10, K-12, K-17, K-23, and T-14. See, also, Topical Response #2.</p>

	<p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
U-4	<p><i>This comment expresses concern with overnight camping and the potential for campers to smoke and/or start illegal campfires, and the lack of training/knowledge of campers to use onsite fire suppression equipment.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, K-3, and K-7. See, also, Topical Response #2.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
U-5	<p><i>This comment states that it is unrealistic to believe that overnight camping will not disturb wildlife. The commenter also states that the EIR fails to consider the danger to humans and animals in allowing campers in areas where wildlife exist, which is likely to cause a disastrous confrontation between humans and animals.</i></p> <p>RESPONSE:</p> <p>Please see response to comment U-1. In addition, DEIR Section 5.4, <i>Biological Resources</i>, Impact BIO-11 addresses potential impacts to wildlife from increased human presence near natural areas facilitated by the proposed improvements. This impact discussion in the DEIR discusses how the proposed Plan has been designed to avoid and/or minimize impacts to sensitive and special-status biological resources by focusing on constructing campsites and associated infrastructure in disturbed, upland, and non-native land adjacent to existing trail corridors where human activity already exists, thus reducing impacts to wildlife movement and reducing adverse edge effects. Furthermore, the DEIR states that the proposed Plan provides for low-impact camping opportunities; thus, implementation of the proposed Plan improvements is not expected to permanently restrict or impede wildlife movement within the study area. Moreover, upon Plan completion, wildlife species will continue to move unrestricted through the study area to other areas of high biological value.</p> <p>Lastly, DEIR Section 5.4, <i>Biological Resources</i>, includes a number of mitigation measures BIO-10.1 through BIO-10.14 (see DEIR Section</p>

	<p>5.4, <i>Biological Resources</i>, for more detail), such as avoiding/minimizing the use of lighting, implementing campground noise restrictions, providing lockers for trash and food storage, and requiring all dogs to be on a leash at all times, which are designed to reduce potential impacts to wildlife to a less than significant level.</p> <p>In addition, a Modified Redesign Alternative has been proposed for consideration and adoption by the Conservancy/MRCA. Under this alternative, concentrated campsites have been developed through a clustering of campsites limited primarily to two parks: Corral Canyon Park and the Malibu Bluffs Conservancy Property. Further, under this alternative, no campsites are proposed at Escondido Canyon Park, the Latigo Trailhead Property and remote camping locations have been removed from Ramirez Canyon Park. As indicated in Section 3.4 of the FEIR (Volume IV), although impacts to sensitive vegetation communities and sensitive wildlife habitat would be similar to that of the Proposed Plan, impacts to sensitive plant species, native trees, and wildlife movement would be reduced compared to the Proposed Plan as a result of a reduction in campsites and parking. The overall reduction in the number of campsites and other facilities proposed under the MRA would, therefore, facilitate the further avoidance of wildlife impacts located within the Plan.</p> <p>Based on the above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>U-6</p>	<p><i>This comment states that the EIR failed to balance the risks that one spark can have on the entire Santa Monica Mountains. The commenter also states that the economic strain on the State of California caused by fighting fires has not been taken into account in balancing the equities of the proposed Plan.</i></p> <p>RESPONSE:</p> <p>Please see response to comment T-12. DEIR Section 2.3.5 (Operations &amp; Maintenance) within the <i>Project Description</i> provides information on operations and maintenance; project funding/ financial feasibility need not be analyzed within the context of CEQA. Please note that the Conservancy/MRCA Boards will take into consideration all comments and suggestions during the decision-making process. Please, also, see Topical Response #2.</p>

	<p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>U-7</p>	<p><i>This comment states that the benefit to a small number of individuals by adding campsites versus the fire danger, whether accidentally or intentionally started to residents, wildlife, environment, and the State of California requires more careful analysis in the EIR.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Please, also, see Topical Response #2.</p>

V

**From:** ajsteinberg@aol.com [mailto:ajsteinberg@aol.com]  
**Sent:** Monday, March 22, 2010 9:16 AM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** no overnight camping in canyons of Malibu

I want to voice my family's strenuous objection to the overnight camping plan being considered for Winding Way and Latigo Canyon in Malibu. Having survived the Thanksgiving wildfires that ravaged our neighborhoods, we have a clear understanding what devastation careless campers and visitors can do in the middle of the night. With extremely limited means of escape, you would be putting hundreds of people in death's way if this irresponsible plan is implemented. The City, Coastal Commission and all planning agencies exist to protect our open spaces and THE PEOPLE WHO LIVE ADJACENT TO THEM.

V-I

A.J., Peter, Hollie and Spencer Steinberg 310-457-7990  
Escondido Drive, Latigo Canyon

<p><b>Letter V</b>  <b>Commenter: A.J., Peter, Hollie and Spencer Steinberg</b>  <b>Date: March 22, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>V-1</p>	<p><i>This comment expresses concern with overnight camping in the Malibu Hills and requests that overnight camping not be allowed.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p> <p>See, also, Topical Responses #1 and #2.</p>

W

**From:** YELLPROD@aol.com [mailto:YELLPROD@aol.com]  
**Sent:** Monday, March 22, 2010 9:51 AM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** overnight camping

My name is Yvette Lang-Einczig and I live at 5084 Latigo Canyon Road. I am extremely frightened that overnight camping might get approved and allowed to happen in Malibu. My house nearly burnt down during the 2008 Thanksgiving fire which was caused by some out of town inconsiderate idiots. By opening up camping our back yards, Malibu will be filled with these out of town inconsiderate idiots who don't care about the residents and their community. It will only be a matter of time before another fire is set by these people. It will also open up our beautiful community to hoards of inconsiderate idiots that will use our mountains as their personal trash dumps and parking lots. The general public don't care about the beauty of our community....have you ever been around on a summer weekend and seen all the garbage left around when everyone goes home? Do not let this happen. I am strongly against this. Yvette Lang-Einczig

W-I

<p><b>Letter W</b>  <b>Commenter: Yvette Land-Enczig</b>  <b>Date: March 22, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>W-1</p>	<p><i>This comment expresses concern and opposition to the Plan’s proposed overnight camping in Malibu.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion is on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p> <p>Nevertheless, a Modified Redesign Alternative has been proposed for consideration and adoption by the Conservancy/MRCA. Under this alternative, concentrated campsites have been developed through a clustering of campsites limited primarily to two parks: Corral Canyon Park and the Malibu Bluffs Conservancy Property. Further, under this alternative, no campsites are proposed at Escondido Canyon Park, the Latigo Trailhead Property and remote camping locations have been removed from Ramirez Canyon Park.</p> <p>See Topical Response #1.</p>

X

**From:** Sharon F. Klinger [mailto:sharonklinger@verizon.net]  
**Sent:** Monday, March 22, 2010 10:34 AM  
**To:** EIRcomments@smmc.ca.gov  
**Subject:** Overnight camping in Corral Canyon

March 22, 2010

Santa Monica Mountains Conservancy,

I am a resident of Corral Canyon, residing at 1966 Newell Road. I suffered a major financial loss in the fire of 2007. At the time our family evacuated our home, traffic was very congested in our canyon. As you know, the wildfire was started by a group of partygoers who lit a campfire and then left quickly when the fire spread. They did not even telephone 911 or the Fire Department to report this.

X-1

It has come to my attention that you are considering overnight camping along new trails that would pass by our home. I am opposed to this because there is no access to public toilets and there are no campsites with fire pits. Anyone attempting to sleep outside, even in the summer would need additional warmth and although there is a no fire, no smoking ordinance in place, certainly we lack enough Rangers to patrol the area. Automobiles that park along Corral Canyon would impede traffic should an emergency take place.

X-2

Our homeowners insurance was cancelled after the 2007 fire and it was difficult to obtain reasonably priced insurance after that incident. I am very apprehensive about our ability to insure our home should you allow overnight camping. Please think about the families who live here and do so because of the lush foliage and wildlife. Keep campers in a safe campsite and out of our backdoors. Think of everyone's safety.

X-3

Sharon F. Klinger  
1966 Newell Road  
Malibu, CA 90265

<p><b>Letter X</b>  <b>Commenter: Sharon F. Klinger</b>  <b>Date: March 22, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>X-1</p>	<p><i>This comment expresses concern with overnight camping in the Malibu Hills and requests that overnight camping not be allowed.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p> <p>See, Topical Response #1 and #2.</p>
<p>X-2</p>	<p><i>This comment expresses the author’s opposition to the Plan’s proposed campsites and trails in Corral Canyon due to concerns with lack of access to public toilets, adequate patrols to ensure no smoking and campfires, and obstructed access along Corral Canyon Road from visitors parking along the roadway.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, B-3, K-10, K-12, K-17, T-6, and X-1. Also see Topical Response #1 and #2.</p>
<p>X-3</p>	<p><i>This comment expresses concern with obtaining fire insurance should overnight camping be allowed in Corral Canyon.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall</p>

	<p>evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. See also Topical Response #2.</p>
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March 22, 2010

Santa Monica Mountains Conservancy  
Mountains Recreation and Conservation Authority  
Attn: Ms. Judi Tamasi  
5750 Ramirez Canyon Road  
Malibu, California 90265

I have a grim prediction to make: If the Santa Monica Mountains Conservancy moves forward with its plan to introduce overnight camping in Corral Canyon, a campfire will spread and wreak havoc, endangering both campers and the already devastated residents of our fire-ravaged community.

Y-1

After losing everything I own in the November 2007 Corral Canyon Fire, I have gone through two years of living hell -- moving from place to place, scrambling to borrow extra money to supplement insufficient insurance funds, sacrificing endless hours dealing with bureaucracy instead of my personal and professional responsibilities.

Many times during this process I thought, "Why am I bothering? This is just too hard, too expensive, too maddening. Why don't I just sell the lot, take the money and move someplace more hospitable -- in every sense of the word?"

Part of what convinced me to stay and overcome these challenges was the incredible rise and strengthening of our community in the wake of the fire. We have come together to help one another and do everything in our power to MAKE SURE THIS NEVER HAPPENS AGAIN.

Y-2

So I have remained -- and have rebuilt. Finally, I thought I reached light at the end of the tunnel, until I learned of the planned campsite in Corral Canyon. Having read and reviewed the EIR Draft Report and having personally walked through the proposed site this past weekend I am completely baffled by how the SMMC could propose such a thing. This is simply arrogant, and completely scornful of what we have suffered -- and the peril we continue to face.

Malibu has more than 1,000 campsites operated by federal, state and local agencies and private operators. Why do you choose to locate another one in the most dangerous, fire-prone canyon in California? Malibu has 23 events, catering and conference facilities that can each accommodate 100 to 500 people. What's the possible justification for a "need" for more?

Y-3

Moreover, where are the funds coming from to create, maintain and supervise this new site? I thought we were in a budget crisis. Speaking of which, has anyone given any thought to how much it will cost the Fire Department to deal with another Corral Canyon conflagration? With all the costs to taxpayers for wildfire suppression over

Y-4

# JAG

the last year, I would think the Governor and other state officials would be looking for ways to reduce the possibility of fires, not increase their likelihood. But that is precisely what you will be doing by introducing overnight camping into the dangerous canyon areas above Malibu.

Y-4

The nightmares of dying in a fire that I finally stopped having a year ago have returned -- that is when I can sleep, as this unbelievable, reckless new proposal has me up worrying night after night. If you move forward with this proposal as currently structured, I have NO doubt whatsoever that my nightmares about another devastating fire in Corral will become a hideous, inevitable reality -- and that the "light" I so hopefully glimpsed at the end of the tunnel is only another wave of flames to engulf us all.

Y-5

That is why I am begging you to find a reasonable alternative to the current plan. This site falls within land categorized as a "Very High Fire Hazard Severity Zone" with a very high chaparral "fuel load." In particular:

Y-6

- The Corral Canyon community has just one access road in and one access road out -- the same road -- Corral Canyon Road at PCH. A wildfire erupting near the proposed campsite locations will block evacuations and impede emergency response.
- Corral Canyon has its own unique weather patterns and a natural wind tunnel within the canyon. Wind gusts have been documented up to 90 mph on any given day. The wind speed during both the October & November 2007 fires was clocked at 70mph. Moreover, onshore flow at speeds much lower than those triggering red flag conditions pose a particular threat to Corral Canyon, yet there is no provision in the EIR to define policy under such conditions.
- There is no provision in the EIR for notifying first responders when a fire erupts.
- There is no provision in the EIR for brush clearance and fuel modification on the surrounding hillsides to make a "fire break."
- The guidelines for patrolling only require supervision during authorized camping. Camping during Red Flag conditions is not authorized and therefore there won't be 24-hour supervision at that time leaving the camp area vulnerable to reckless behavior.

Y-7

Y-8

Y-9

Y-10

Y-11

How could the marginal benefit of an additional campsite in Malibu possibly justify this obvious risk? Please, please reconsider -- or at the very least work with our community to come up with a plan we can all live with, literally.

Y-12

Sincerely,



Jennifer A. Grossman

<p><b>Letter Y</b>  <b>Commenter: Jennifer Grossman</b>  <b>Date: March 22, 2010</b></p>	
<p><i>Introduction</i></p>	<p>In response to comments, two topical responses have been created (Topical Response #1 – the Modified Redesign Alternative &amp; 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.</p>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>Y-1</p>	<p><i>This comment expresses concern with overnight camping in Corral Canyon and potential devastating effects from a campfire.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p> <p>See, Topical Responses #1 and #2.</p>
<p>Y-2</p>	<p><i>This comment expresses concern with overnight camping in Corral Canyon.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Please see Response to Comment Y-1 and Topical Responses #1 and #2.</p>
<p>Y-3</p>	<p><i>This comment states that there are more than 1,000 campsites operated by federal, state, and local agencies in Malibu and 23 event, catering, and conference facilities, each able to accommodate 100 to 500 people, and asks why there is a need for additional facilities.</i></p>

	<p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
Y-4	<p><i>This comment asks where the funds are coming from to create, maintain, and supervise the proposed campsites in Corral Canyon Park. The commenter also states that the State is in a budget crisis.</i></p> <p>RESPONSE:</p> <p>See response to comment K-23. DEIR Section 2.3.5 (Operations &amp; Maintenance) within the Project Description provides information on operations and maintenance; project funding/ financial feasibility need not be analyzed within the context of CEQA.</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
Y-5	<p><i>This comment expresses concern with the proposed Plan.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body.</p>
Y-6	<p><i>This comment requests finding a reasonable alternative to the proposed Plan</i></p>

	<p><i>campsites in Corral Canyon, an area categorized as a “Very High Fire Hazard Severity Zone”.</i></p> <p>RESPONSE:</p> <p>Please see response to comments L-2, N-1, Y-1, and Topical Responses #1 and #2.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
Y-7	<p><i>This comment expresses concern with limited emergency access in and out of Corral Canyon.</i></p> <p>RESPONSE:</p> <p>Please response to comment T-12 and Y-1.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
Y-8	<p><i>This comment expresses concern with the wind tunnel effects and on-shore flows within Corral Canyon.</i></p> <p>RESPONSE:</p> <p>The tunnel effects within Corral Canyon are noted. 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</p>

	<p>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 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.</p> <p>See also Topical Response #2.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>Y-9</p>	<p><i>This comment states that there is no provision in the EIR to notify first responders when a fire erupts.</i></p> <p><b>RESPONSE:</b></p> <p>The Los Angeles County Fire Department has primary fire protection responsibility in Malibu and the Santa Monica Mountains; all calls to 911 with respect to fire will be responded to. In addition, the Conservancy/MRCA property at Ramirez Canyon Park is the Western Sector Emergency Command Center for fire/disaster/public safety emergencies. As such, MRCA is equipped with full computer and radio dispatch capabilities in the event of any emergency.</p>

	<p>See also Topical Response #2.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
<p>Y-10</p>	<p><i>This comment states that there is no provision in the EIR for brush clearance and fuel modification on the surrounding hillsides to make a “fire break”.</i></p> <p><b>RESPONSE:</b></p> <p>Please see response to comment A-4. The proposed Plan includes Fire Protection Plan’s for each park that provides a redundant layering of prevention, protection, suppression and pre-planning methods and measures that have been proven to reduce fire risk. The combined fire protection system designed for the proposed Plan includes fuel reduction/treatment, enhancement and maintenance of ingress/egress routes, park and trail access control, options for emergency relocation and contingency sheltering areas, and restriction of open flames in all Park areas, amongst others. The system significantly reduces the fire risk associated with the Plan and the project area.</p> <p>As part of each FPP, fuel modification areas are identified and have been designed to gradually reduce fire intensity and flame lengths from advancing fire by reducing fuels, placing thinning zones, and restricted vegetation zones adjacent to each other on the perimeter of structures and adjacent naturally vegetated areas; in addition, irrigated zones would be required at Ramirez Canyon Park. Fuel modification requirements will vary at each park property depending on site-specific characteristics and the type of improvement/uses proposed. Site-specific planting and spacing requirements apply to all Parks, as described in DEIR <i>Appendix I</i>.</p> <p>Furthermore, the Los Angeles County Fire Department has primary fire protection responsibility in Malibu and the Santa Monica Mountains; and therefore, is responsible for installing and maintaining any fire/fuel breaks in the area deemed necessary by the Fire Department.</p> <p>See also Response to Comment Y-1 and Topical Response #2.</p>

	<p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
Y-11	<p><i>This comment states that there would be no supervision during Red Flag conditions, particularly at the camp areas.</i></p> <p>RESPONSE:</p> <p>Please see response to comments A-2, A-4, B-3, K-10, K-12, K-17, K-26, and T-4. See also Topical Response #2.</p> <p>Based on the discussion above and the analysis contained within the DEIR, no further revisions to the DEIR would be required.</p>
Y-12	<p><i>This comment asks how you justify the marginal benefit of an additional campsite in Malibu versus the fire risk.</i></p> <p>RESPONSE:</p> <p>CEQA Guidelines Section 15088(a) specifies that the “lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response.” This comment does not address an environmental issue. Your opinion on the proposed project is important, however, and your comment will be included in the FEIR presented for review and consideration by the Conservancy/MRCA’s decision-making body. Please, also, see Topical Response #2.</p>

Z



March 18, 2010

Santa Monica Mountains Conservancy  
Attn: Ms. Judi Tamasi  
5750 Ramirez Canyon Road  
Malibu, California 90265

RE: Comment on the Malibu Parks Public Access Enhancement Plan – Public Works Plan Draft  
Environmental Impact Report

Dear Ms. Tamasi,

The California State Coastal Conservancy has received the draft Environmental Impact Report for the Malibu Parks Public Access Enhancement and Public Works Plan. The plan proposes to increase public access to protected open space and the coast through the creation of new trails and improved public park facilities.

The Coastal Conservancy has worked in partnership with the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority to help the public acquire many of these open space properties specifically for the purpose of improving public access and protecting coastal resources. This plan will achieve those goals and is consistent with the mission of the State Coastal Conservancy. Our agency supports the implementation of the plan and we look forward to working with you to increase public access to these valuable public resources.

Z-I

Sincerely,

A handwritten signature in blue ink, appearing to read "Sam Schuchat".

Sam Schuchat  
Executive Officer

1330 Broadway, 13th Floor  
Oakland, California 94612-2512  
510-286-1015 Fax: 510-286-0470

<p><b>Letter</b> Z  <b>Commenter:</b> Sam Schuchat  <b>Executive Officer, California State Coastal Conservancy</b>  <b>Date:</b> March 22, 2010</p>	
<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 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</p>

	<p>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.</p> <p>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.</p> <p>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.</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>
<p><b>COMMENT NO.</b></p>	<p><b>RESPONSE</b></p>
<p>Z-1</p>	<p><i>This comment expresses the Coastal Conservancy's support of the Conservancy's Malibu Parks Public Access Enhancement Plan.</i></p> <p>RESPONSE:</p> <p>The Coastal Conservancy's ongoing support to achieve its goals to</p>

	improve public access and protect coastal resources, is acknowledged and appreciated. The Conservancy and Coastal Conservancy will continue to work together collaboratively to increase public access to the coastal park areas.
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