F. List of Comments Received

List of Comments Received on the Calero County Park Trails Master Plan and associated Initial Study / Mitigated Negative Declaration

1. State of California, Governor’s Office of Planning and Research
   Scott Morgan, Director, State Clearinghouse

2. Joyce McKee (verbal comment)

3. Barbara White

4. Santa Clara Valley Water District

5. Glenn A. Bothwell (received after 30-day public comment period)
G. Responses to Written and Verbal Comments

This chapter presents each written or oral comment received by both individuals and agencies on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Calero County Park Trails Master Plan (“Trails Master Plan”) by the County of Santa Clara, Parks and Recreation Department (“County Parks Department”) during the 30-day public review period of the IS/MND between July 10, 2013 and August 9, 2013. Each comment letter is followed by the corresponding responses. The numbering of the responses to comment corresponds to the comment number in the margins of the comment letters.

Comment Letter 1 State Clearinghouse

Response 1-1: This is an acknowledgment from the State Clearinghouse that the project has complied with their requirements for draft environmental documents pursuant to the California Environmental Quality Act (CEQA) and that no State agencies submitted comments through the Clearinghouse. This letter does not require a response.
August 9, 2013

Elish Ryan
Santa Clara County, Dept. of Parks and Rec.
Sec. 298, Garden Hill Dr.
Los Gatos, CA 95032

Subject: Calero County Park Trails Master Plan
SCH#: 2013072023

Dear Elish Ryan:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on August 8, 2013, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

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

Sincerely,

Scott Morgan
Director, State Clearinghouse
SCH# 2013072023
Project Title Calero County Park Trails Master Plan
Lead Agency Santa Clara County

Type MND Mitigated Negative Declaration
Description The proposed Draft Calero County Park Trails Master Plan (Trails Master Plan) provides a framework for expansion of the existing park trail system into a multi-use trail network over 10-year time period, while supporting protection and enhancement of the sensitive cultural and environmental resources within the park. The Trails Master Plan nearly doubles the mileage of the existing trail system. Equestrians and hikers currently use approximately 20 miles of trails. At final build-out, the expanded trail system will be approximately 36 miles and will offer many trails for walkers with dogs on-leash and mountain bikers while still retaining historic, limited trial use for equestrians and hikers on some trails. In addition, the Trails Master Plan will provide regional trail connections as identified in the Santa Clara County Countywide Trail Master Plan (1995).

Lead Agency Contact
Name Elish Ryan
Agency Santa Clara County, Dept. of Parks and Rec.
Phone 408 355 2235
Email
Address Sec. 299, Garden Hill Dr.
City Los Gatos

Project Location
County Santa Clara
City San Jose
Region
Lat/Long 37° 11' 13.15" N / 121° 46' 30.59" W
Cross Streets Entrance at 23205 McKean Road, approximately 3 miles SW of U.S. Hwy 101
Parcel No.
Township
Range
Section
Base

Proximity to:
Highways Hwy 101
Airports
Railways
Waterways Calero Reservoir
Schools
Land Use Regional Park; County: A, A H: A HS-sr, Regional Park, Existing; City: R-1-1, Open Hillside

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Aborption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Paparian; Landuse

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 3; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 2; Native American Heritage Commission; State Lands Commission

Date Received 07/10/2013 Start of Review 07/10/2013 End of Review 08/06/2013
July 29, 2013

Polaris Kinison Brown
EMC Planning Group
301 Lighthouse Way
Monterey, CA  93940

SUBJECT: Verbal Response to Calero County Park Trails Master Plan Initial Study/Mitigated Negative Declaration

Dear Polaris,

On July 29, 2013, I received a call from Joyce McKee, who resides at 21201 Bertram Road, San Jose, CA  95120. As a resident within the vicinity of the Calero County Park Trails Master Plan project, she had received the Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration for the project.

Ms. McKee stated that she was opposed to the walk-in entrance proposed in the project to be located on Bertram Road. It is her stated opinion that this entrance will be a nuisance and a safety hazard, encouraging people to park illegally on Bertram Road. She stated that this is already a persistent problem on that street and that she has contacted the Sheriff’s Department. She has also been in contact with County Roads and Airports requesting that traffic control measures be put in place to reduce the parking problem. She has also observed people illegally entering the park at this location at night and loitering behind her house. A park entrance on Bertram Road, even if just for local residents to access by foot, horse, or bicycle will be a problem as many people in the neighborhood will want to drive to this location. She was happy to learn that other locations to access the park would be available and encouraged us to change to Trails Master Plan to eliminate the Bertram Road option based upon its impact to local residents.

Ms. McKee was asked to submit written comments per the instructions on the Notice of Intent. But since that conversation, we have not received any written comments, so this letter serves as documentation of their verbal response to the Draft Initial Study/Mitigated Negative Declaration.

Sincerely,

Elish Ryan
Planner III

Cc: Julie Mark, Deputy Director of Administration
    Jane Mark, Senior Planner

Board of Supervisors: Mike Wasserman, Dave Cortese, Ken Yeager, S. Joseph Simitian, Cindy Chavez

County Executive: Jeffrey V. Smith
Comment Letter 2. Joyce McKee (Verbal comment documented in July 29, 2013 memo)

Response 2-1: Comment noted. Trail access at the Bertram Road entrance location has been discussed and identified as part of the proposed trails master plan for neighborhood walk-in access based on public input and interest. Concern about trail entrance location and limited public parking is noted and will be considered in the future development of the project designs.

Response 2-2: Comment noted. Trail access at this location will be subject to the County of Santa Clara’s Ordinance Code Section B14-14.1 which requires posted hours of access. Effective May 1, 2007, the hours of access for trail use are sunrise to sunset. Trail hours are to be treated independently of the regular park hours of access from 8 AM to sunset, which will not change. After hours activities will be addressed by County Park Rangers on-call and with support from deputies from the Sheriff’s Office. The County Parks Department will enforce park use in accordance with Ordinance Code Section B14-14.1, where Park Rangers will patrol the County’s park system year round for parking and traffic enforcement.
From: Barbara White
Sent: Tuesday, July 30, 2013 11:47 AM
To: Ryan, Elish
Cc: Supervisor Yeager; Wasserman, Mike; Cortese, Dave; Supervisor Simitian
Subject: Negative Declaration Calero Park

Dear Elish,

I have reviewed the Negative Declaration for the Calero Parks Master Plan, and I have a couple of comments regarding issues that I don’t believe have been properly mitigated. My concerns are about the addition of mountain bikes to trails that, in the past, have been restricted to hikers and equestrians. As a frequent horseback rider in Calero Park, I know that many of the trails proposed for multi-use would not be safe because of the instinctive behavior of equines and the somewhat scofflaw attitude of many bikers. These are two separate matters, obviously, but the point is that many of the trails proposed for multi-use at Calero are dangerous for such use at this time. The Chisantuk Peak trail, because of its blind corners, steep areas, narrow width and drop-offs is a perfect example. I note that changes are proposed for some sections of this trail, but I can’t imagine any changes that would be so great as to ensure safety.

I am concerned about the Operations and Maintenance section on page 30. It states that the decision to implement staff increases will be dependent on many things, including budgetary constraints. Such budgetary constraints, and resulting lack of enforcement of trail rules in recent years, have resulted in mountain bikers riding with impunity in parks everywhere. Apparently, they know they won’t be caught and they feel entitled to ride wherever they want, as it is, because these are public lands. How will bikers breaking the speed limit or going into the equestrian area be prevented when there is no enforcement? I think the enforcement should be visible and active before new users are allowed into the park, rather than stating it will be dependent on a range of factors. This seems to ignore the need for safety in an effort to appease a loud, new user group. Sort of putting the cart before the horse. Wouldn’t it be more prudent to realign the trails, have adequate enforcement, and then, thereafter, introduce new users into the mix?

Page 127 of the document discusses recreation and asks the question, \(^3\) Would the project affect existing or future recreational opportunities? \(^2\) The impact checked on the chart is, \(^3\) Less than significant impact. \(^2\) I strongly disagree with that. The project is going to have a very large impact on existing equestrian opportunities. The trail experience for equestrians on blind single track trails, knowing that a mountain bike could appear at any time, will be very negative. I know equestrians who do not ride in Canada del Oro because bikes are allowed in there. I know equestrians, including myself, who no longer go to Almaden Quicksilver because of the bikes. The Calero experience could become one of fear, diminishing the quality of the trail experience and potentially causing equestrians to go elsewhere.

At the June 5th meeting, one of the men in the audience, who claimed to be both a mountain biker
and equestrian, said the problems could be resolved if only the equestrians would spend 15 minutes a day training their horses. He should know what he said is false, and it should have been challenged on the spot. Yes, horses can be trained to not be fearful of bikes in just a few training sessions. What cannot be trained out of them (or me, for that matter) is an instinctive flight response to a silent, moving object coming around a blind corner at speed. Wide roads with a good line of sight are appropriate for multi-use. Narrow, twisty trails are a recipe for disaster. As I have mentioned to you before, my horses are trained, yet I have been in two collisions on multi-use trails with bikers who lost control of their bikes and skidded into my horses. This is not fun for anyone. If mountain bikes and other mechanized forms of transportation are to be allowed into parks, please let them have their own trails. I, for one, would rather have half the trails for horseback riding and know they are safe and enforced, than share trails (or ride trails where legal use is not enforced) and have to worry about either collisions with mountain bikes or a frightened horse going over into the abyss from a single-track, cliff side trail.

Please remember that hikers and horses are not evolving. Mountain bikes are. They are changing into bikes than can go anywhere, at increasing speed. Many of the bike riders are not out there to commune with nature. In truth, many of them are looking for thrills, faster times, and bragging rights. I wonder what the Parks¹ definition of ³mountain bike² is. Does this mean trail roller blades or mountain skateboards or any wheeled contraption of the future is allowed? How about a bicycle with a silent motor to get up the hills?

I urge you to proceed cautiously, in the name of safety. All outdoor activities come with risk; every park user knows that. However, to knowingly add an incompatible user group on hazardous trails, with no assurance of enforcement, to an existing user group doesn't make sense to me. I don't believe a Negative Declaration is appropriate with such unresolved issues. Thank you very much for the opportunity to comment.

Sincerely,

Barbara White
Response 3-1: The Calero County Park Trails Master Plan (“Trails Master Plan”) will retain approximately 7.5 miles of trails as limited use for equestrian and hiking only. In addition, the Trails Master Plan proposes expanding multi-use trails which will include hiking, hiking with dogs on-leash, equestrian and off-road mountain bicycling uses to approximately 26.6 miles of trails, as part of the policy implementation which is consistent with Board-approved policies and priorities identified in the Santa Clara County General Plan (1995-2010), Santa Clara County Countywide Trails Master Plan Update (“Countywide Trails Master Plan,” November 1995) and the Strategic Plan for the Santa Clara County Parks and Recreation System (August 2003).

Expanded multi-use trails will be designed and constructed to meet the County’s approved Countywide Trails Master Plan trail design guidelines that are based on ongoing trail management experience, trail user feedback and recreation industry Best Management Practices. Trail design for multi-use trails shall follow design guidelines in Figure G-3, which recommends a range of 6’-0” to 12’0” depending on the terrain, and single-trail trails shall follow design guidelines in Figure G-4, which recommends 4’-0” to 6’-0” as optimum trail widths.

The County Parks Department has considered the potential for differing types and levels of impacts between different users on the trails and on the environment through extensive trail assessment and field work, as well as environmental site analyses which identified suitable terrain for each of the multiple user groups, including hikers, hikers with dogs on-leash, equestrians and mountain bicyclists. The Calero County Park Trails Master Plan considers these differences in trail users and proposes alternate trail route options that would avoid significant impacts to both the environment and the trail users. In addition, the County Parks Department’s trail design guidelines, the BMPs in the Trails Master Plan and the IS/MND, lessons learned from building multi-use trails in other County Parks (i.e. Coyote Lake-Harvey Bear Ranch County Park) and other provisions will be used in developing the specific trail alignments in order to avoid site-specific impacts both at time of construction and as public use is implemented.

Response 3-2: The Chisnantuck Peak trail is proposed to be upgraded to a multi-use trail which will also provide regional trail connectivity through Calero County Park. Trail improvements will be refined based on the topography and alignment adjustment in the field. The purpose of the Trails Master Plan was to provide an initial assessment of preferred trail alignment based on existing landscape resource conditions. Recommendations for trail alignments are conceptual and will require further field study and construction modifications before constructing suitable new trails to accommodate the multiple users in the park. The trail design criteria are based on successful experiences in other County parks and continued assessment of trail conditions for safety. The County Parks Department applies Best Management Practices incorporating dips, grade reversals, gentle rises at trails junctions, and sinuous routes with varied trail slopes and lines of sight to moderate speed on the trails, as part of the trail design and
construction to ensure safe trail uses and varied recreational trail experiences in the trail system.

Response 3-3: The County Parks Department would implement the Countywide Trails Master Plan policies M-1.0 through M-6.0, which provide for trail use management, trail monitoring and maintenance.

County Park Rangers will be monitoring trail use as part of their regular patrol functions. As part of their patrol and enforcement duties, County Park Rangers are trained and certified to enforce speed regulations. If trail use safety is compromised based on trail use experiences and management, the County Parks Department can recommend trail restrictions and/or closure until appropriate design modifications or enforcement strategies are implemented. With project improvements phased over time and as trail alignments are opened to the public, staffing needs for Calero County Park will gradually increase and shared staff arrangement would need to be re-evaluated.

In addition to County Park Rangers, volunteer patrols (i.e. Trail Watch volunteers) aid in the patrol presence of the park.

Response 3-4: The Trails Master Plan recognizes the need to implement improvements to new trail uses prior to public use, where “Improvements to existing trails requiring upgrades before they can be designated as multi-use trails are expected to be part of this strategy” (Draft Trails Master Plan - page 71). The County Parks Department anticipates the Trails Master Plan will be implemented in phases incrementally over a 10 year period.

Response 3-5: See Response 3-1 above. Personal trail use experience varies among cyclists and equestrian users on multi-use trails. To accommodate multi-use and enhance for safety, trails are being redesigned to slow cyclist speeds and improve sight lines. Existing trails in the County Park system have been redesigned as needed in response to trail management experiences, best practices, new trail design guidelines/standards, public comments and trail user experiences.

Response 3-6: County Ordinance Code Section B14-33.1 restricts vehicles or motorized uses on trails, with the exception of authorized maintenance and emergency service vehicles and wheelchairs to accommodate access that complies with the 2010 American Disability Act (ADA) federal guidelines. However, with the need to comply with 2010 ADA federal guidelines, access may be allowed by Other Power-driven Mobility Devices (OPDMD) with some site based restrictions and limitations (ADA Power Driven Mobility Devices / Procedure 311 – dated March 2013). Future consideration of electric bicycle use on trails would require an assessment of the appropriate site conditions, terrain, and compatibility with the environment, current trail uses and other considerations before these uses are allowed on trails.
August 7, 2013

Ms. Elish Ryan
Santa Clara County Parks and Recreation Department
298 Garden Hill Drive
Los Gatos, CA 95032

Subject: Calero County Park Draft Trails Master Plan and Draft Initial Study/Mitigated Negative Declaration

Dear Ms. Ryan:

The Santa Clara Valley Water District (District) has reviewed the Calero County Park Draft Trails Master Plan dated May 2013 and the Draft Initial Study (IS)/Mitigated Negative Declaration (MND) dated July 8, 2013 and received by the District on July 11, 2013.

As noted in the above referenced documents, the District owns the land for Calero Reservoir which is leased to the County for recreational uses and inclusion in the Calero County Park via the Reservoir Master Lease. The project also includes two proposed crossings of the District’s Almaden-Calero Canal and associated property which is not included in the Master Reservoir Lease. Any work on the District’s easements or fee title property will require the issuance of a District permit as per the District’s Water Resources Protection Ordinance. Additionally the proposed crossings of the Almaden-Calero Canal will require amendment of the lease to include this land which requires action by the District Board of Director’s prior to issuance of any permits. The District is to be considered a responsible agency under CEQA since the project will require discretionary District permits and Board action for amendments to the lease.

Based on our review of the proposed project as shown on the above referenced documents we have the following comments:

1. The District’s Almaden Valley Pipeline, a 72-inch diameter high pressure raw water transmission pipeline, is located within a District easement along the southerly side of McKean Road. The access road to the proposed San Vicente staging area will cross this easement and pipeline and will require a District permit. The District can provide plans for the pipeline and the easement deed upon request.

2. Plans for the individual projects need to clearly show District lands, easements and facilities.
Ms. Ryan  
Page 2  
August 7, 2013

3. Plans for all the improvements located within District fee title property and easement will need to be submitted for permit review and issuance, including staging areas, new restroom facilities, utilities, stormwater detention facilities, fencing and signage at the canal crossings, planting, etc.

4. Planting for the project needs to be in conformance with the Guidelines and Standards for Land Use Near Stream and the District’s Water Resources Protection Manual. The Master Plan and MND/IS do not discuss conformance with these documents.

5. Page 69 of the Biological Resources section of the IS notes there is no impact to watercourses etc.; however, bridges are proposed over various creeks and even if done with clear spans there can be impacts though they may not be significant. Additionally, the Master Plan notes that Trail #13 will require several bridges or culverts which is not consistent with the IS analysis as culverts would clearly impact the creek.

The District looks forward to continuing to work with County Parks staff as this project continues to progress. Please provide a copy of the final Master Plan and other project documents/plans when available for District review. Reference District File Number 20418 on further correspondence regarding this project. If you have any questions or need further information, you can reach me at (408) 630-2322.

Sincerely,

Colleen Haggerty, P.E.
Associate Civil Engineer
Community Projects Review Unit

cc: S. Tippets, C. Haggerty, File

20418_56009ch08-07
Comment Letter 4. Santa Clara Valley Water District (August 7, 2013 letter)

Response 4-1: Comment noted. The County acknowledges the Santa Clara Valley Water District (SCVWD)’s policies and ordinances that may require District land lease amendments and permits for proposed improvements on SCVWD lands. This includes proposed plantings which would need to meet with SCVWD Guidelines and Standards for Land Use Near Streams and the District’s Water Resources Protection Manual.

Response 4-2: The Initial Study checklist for Section D. Biological Resources, item #14 has been revised accordingly to “less than significant impact” instead of “no impact” to address the proposed bridge and culverts in the Trails Master Plan. See Section H. Summary of Edits to the Initial Study and Trails Master Plan.

In regards to the proposed bridges and culverts for trail crossings, the County Parks Department would implement policies, trail Maintenance guidelines for bridge design, design guidelines and BMPs to avoid and minimize potential impacts to the creek and would ensure that no impacts to riparian habitat would occur with maintenance activities within or adjacent to water courses. These include:

Countywide Trails Master Plan Design Guidelines:

**D-1.3.3.2** Trail crossings of freshwater stream zones and drainages shall be designed to minimize disturbance, through the use of bridges and culverts, whichever is least environmentally damaging

**D-1.3.1.4** Biological resource assessments shall be conducted as specific trail routes are implemented. These assessments will include mitigation recommendations as appropriate. These guidelines do not substitute or replace any existing codes, rules, or regulations of land managing and permitting agencies that may govern trail development, but in addition to them. Necessary permits from these agencies will be obtained when trail alignments result in impacts to their jurisdictional areas.

Santa Clara Valley Habitat Plan Conditions:

**Condition 3.** Maintain Hydrologic Conditions and Protect Water Quality
**Condition 4.** Avoidance and Minimization for In-Stream Projects
**Condition 5.** Avoidance and Minimization Measures for In-Stream Operations and Maintenance

Included in the above Habitat Plan conditions are aquatic avoidance and minimization measures (Table 6-2 of the Santa Clara Valley Habitat Plan) that address stream crossings, trail crossings of freshwater stream zones and drainages, appropriate design, placement and sizing of culverts, which the County Parks Department would implement as part of the project’s compliance with the Habitat Plan.
Santa Clara County Parks

Attention: Jane Marks, Sr. Planner
298 Garden Hill Drive
Los Gatos, CA 95032

RE: Calero County Parks Trail Expansion

Dear Jane,

I am the nearest neighbor to the Casa Loma Trailhead entrance to the park. My house looks upon the meadow that the negative declaration sites as the future expansion area for picnic tables and a parking lot. I am opposed to turning this environmentally sensitive area into another parking lot.

I have some concerns regarding the trail expansion project and its Negative declaration.

1. I believe the meadow on Casa Loma Road would need its own EIR as it is home to many species that may be endangered or at least of concern. The reports commitment to biological monitoring during planning and construction is far less than what would be required if this was a private project. The county needs to be held to the same standards as private developers.

2. Santa Clara County Parks needs to include fuel reduction planning in their expansion plan and set aside money to fund this maintenance. I am concerned that by opening up this remote area to more people the risk of fire is significantly increased.

   County Parks currently does very little to maintain its property along Casa Loma Rd.

   Many trees and or large limbs from trees in the meadow have fallen and nothing has been done to clear the dead wood or trim the remaining tree to preserve their health. These trees need an arborist to save them. The EIR talks about replacing trees of a certain size that may need to be cut for trail expansion yet it does nothing to preserve what it has. This land is in the City limits and the City of San Jose has strict rules about weed abatement and yet Parks does nothing to reduce the risk of fire through cutting, diskng or grazing.

   Open space, next door, spends a lot of resources reducing their fuel for fires. We recently had a fire 200 yards from the trailhead and if it hadn’t been for the grazing that had been done that fire would have been much more difficult to control and certainly could have reached my property line.

3. At the community meetings I expressed my concern that the Casa Loma staging area should not be opened for bikes until the other trailheads are opened for bikes. Opening Casa Loma before the others
would put unacceptable pressure on this relatively small lot and narrow road. This new pressure from cyclists needs to be spread throughout the park and not focused on 1 spot. I don’t see anything in the plan that says this will happen. Please consider it.

4. Casa Loma Road is maintained by the City of San Jose in the area where it runs along the Park property. There is a problem with that. The City of San Jose does very little to maintain this section of Casa Loma Rd. Trees have overgrown from both sides which narrows the road and causes cars to travel along the center which creates quit a problem when two cars are traveling in opposite directions. The original road is composed of multiple layers of oil and screenings. (No section of asphalt). Since the opening of the existing staging area several years ago the city has done almost nothing to maintain this road. Increasing traffic will only make it worse. County Parks needs to take responsibility for the maintenance or at least get a commitment from the City that they will do it. Our road is a series of potholes and patches. It can’t take more pressure without maintenance.

5. The report identifies two historical structures within the park yet makes no commitment to preserving them. Before we spend money building new structures and trails we need to know that the historical structures we have will be preserved. The barn on Casa Loma Road is in desperate need of repair. If work is not done to reinforce the structure and patch the roof it will certainly fall down within the next decade if not the next few years.

Sincerely,

Glenn A. Bothwell
333 Casa Loma Road
Morgan Hill, CA
Response 5-1: As part of fulfilling the requirements of the California Environmental Quality Act (CEQA), the County Parks Department conducted a program-level biotic resource study as well as Biotic Resources Evaluation for the Initial Study/Mitigated Negative Declaration for the Calero County Park Trails Master Plan. In addition, the County Parks Department would need to comply with the biological monitoring requirements of the Santa Clara Valley Habitat Plan (VHP) conditions for covered activities, along with numerous detailed Best Management Practices that the County Parks Department implements for trails and support facilities improvements. Prior to construction, the County Parks Department will complete a site-specific biological survey for resources for preservation and protection, if known species occurrences are known to occur in the area.

In a follow-up discussion with the commenter on August 16, 2013, the commenter clarified that this comment was intended to address the need for additional environmental review and documentation for any new proposed staging areas along Casa Loma Road, in the event that the County Parks Department would need to consider a new parking area in the meadows along Casa Loma Road. Commenter explained his concern if the shared parking arrangement on the existing Open Space Authority’s Canada del Open Space Preserve staging area would not be able to accommodate the additional visitor uses with the introduction of mountain bicycle uses to Calero County Park. To comply with CEQA, the County Parks Department would conduct the appropriate environmental review and assessment for any proposed expansion of parking uses along Casa Loma Road.

Response 5-2: Comment noted. The County Parks Department implements the County of Santa Clara Ordinance Codes for Fire Prevention (Sections B14-21.1 through 21.5) and has procedures in place to prevent wildfires as defined in a Memorandum of Understanding with CalFire for Fire Prevention and Operational Procedure (revised August 2012). County Ordinances include a Board-adopted “No Smoking Ordinance (Ordinance No. NS-625.5: Smoking Pollution Control Ordinance)” which include all County park areas, and procedures are in place to prevent fires through preventative measures and procedures when performing work in remote/backcountry areas (i.e., during fire season, work that has a risk of starting a fire is ceased when the relative humidity is less than 30% or on a designated Red Flag Day). In addition, the Department implements Guideline D-5.5 for Wildland Fire Suppression from the Countywide Trails Master Plan, which states:

**D-5.5 Wildland Fire Suppression:** Regional Staging Areas should be designed to optimize fire suppression capability in the area and to reduce the potential for wildland fire ignitions.

The County Parks Department and CalFire maintain a fuel break along Bald Peaks Trail in Calero County Park and participates in inter-jurisdictional emergency services planning. This designated fire break is part of the SCVWD Watershed Protection PL566 Project that includes Casa Loma Road to the Santa Cruz Mountains. Additionally, the
County Parks Department is working on infrastructure improvements to return a managed cattle grazing program to the Canada del Oro portion of Calero County Park. The Department has been working on proposed improvement, repair and replacement of boundary fencing to contain cattle at Calero County Park, and is researching water needs and availability to sustain cattle grazing on parkland. Due to budget constraints, the grazing program is taking longer than anticipated, but the Department is working toward this as budget and staffing allows.

The County Parks Department implements trail maintenance standards for pruning and vegetation management along trails. In backcountry and remote/natural areas, downed materials and vegetation provide habitat value to wildlife. Those values are weighed with forest health and safety when determining if downed materials can remain in the landscape. When those materials are adjacent or within fire code regulations for defensible space and clearance, the Department does remove that vegetation to meet those standards and regulations.

Response 5-3: Comment noted. The Open Space Authority’s staging area at Canada del Oro Open Space Preserve along Casa Loma Road currently allows mountain bicycle access and uses. With the Authority’s permission to allow shared parking for the trail users accessing Calero County Park, the additional mountain bicyclists would not result in any additional impacts to the existing staging area which already accommodates this use.

Response 5-4: Comment noted. The County of Santa Clara, Roads and Airport Department owns a portion of Casa Loma Road, specifically, a 0.80 mile segment starting from the midline of McKean Road, where the County’s maintenance of the road is identified in the chip seal program in 2019. For maintenance of the County’s portion of the road, the area is subject to the County’s Integrated Pest Management (IPM) Ordinance Code Section B28 which requires the use of non-pesticide management and other sustainable practices. For the portion of Casa Loma road that is owned by the City of San Jose, the County Parks Department would not be taking responsibility for maintaining City of San Jose’s portion of the roadway.

Response 5-5: Comment noted. The County will be considering the Casa Loma Barn as part of future recommendations in a separate planning process for the “Unused Structures Inventory/ Assessment.” For the Bailey-Fellows House and surrounding ranch complex near the Park Ranger office, the facility is owned by the Santa Clara Valley Water District, where there are no immediate plans for future use or management.