List of Comments Received

List of Comments Received on the Santa Teresa Grazing Management Plan
Initial Study/ Negative Declaration

1. Roland Lebrun
2. Woody Collins
Dear Mr. Courtney,

Thank you for pointing me to the Initial Study. I am respectfully requesting that you extend the public comment period to July 15th for the following reasons:

1) The initial study is dated April 15 2013 but stakeholders did not receive the notice of intent to Adopt a Negative Declaration until May 15th:

2) The Initial Study is a 32-page document that refers extensively to a 223-page document known as the Grazing Management Plan (GMP)
3) The Community Meeting scheduled for Saturday June 8th at 5:30 PM was cancelled without any prior notification.

4) Last but not least, the current plan proposes to obliterate a regional park currently used as an urban park and a major wildlife corridor between Almaden Valley and Coyote Valley, so a Negative Declaration without any mitigation does not appear appropriate (see attached picture).

Thank you.

Roland Lebrun.
Response 1-1

Once the Initial Study for the Santa Teresa Grazing Management Plan ("the Project") was completed on April 15, 2013, a Negative Declaration and Notice of Intent was prepared for mailing to nearby property owners, residents and neighbors. As part of the public notification process, the Parks Department utilized a comprehensive mailing list for the property owners, residents, and neighbors surrounding the park. The County Parks Department mailed out approximately 650 Notices of Intent to the property owners, within 150 feet of Santa Teresa Park; in addition notices were also mailed out to those who attended the public meeting held June 8, 2011 at the Santa Teresa Golf Course Banquet facility. The Notice of Intent provided a 30 day public review period from May 15, 2013 to June 14, 2013. Per CEQA requirements, Section 15073 (a): The lead agency shall provide a public review period of not less than 20 days. The Parks Department provided the public with a review period of 30 days as a courtesy to allow the public additional time for review and submitting comments.

The public notice provided a tentative date of June 25, 2013, for the Board of Supervisors to consider and adopt the Initial Study/Negative Declaration for the project. Due to additional project requirements, the project will not be considered by the Board on June 25, 2013, and will be scheduled for later this summer.

Response 1-2

The Initial Study (discussed at the June 8, 2011 public meeting) and Negative Declaration were prepared as part of the Department’s environmental assessment in determining whether or not there would be potential significant environmental effects as a result of the proposed implementation of the Santa Teresa Grazing Management Plan. A determination was made after the preparation of the Initial study that the proposed project would not have a significant effect on the environment. The Initial Study references the Draft Grazing Management Plan because the Initial Study was prepared per CEQA guidelines to review the potential for significant environmental effects prior to the Project being implemented.

Response 1-3

The County Parks Department did not send out public meeting notices or schedule a public meeting at Santa Teresa County Park on June 8, 2013. A public meeting was held on June 8, 2011 from 5:30 pm to 7:00 pm at Santa Teresa County Park to provide the public with information regarding the Santa Teresa Grazing Management Plan and solicit feedback on the project.
The Santa Teresa Grazing Management Plan is a site specific, phased approach to re-introduce managed-cattle grazing to the Park to improve management of annual grassland, oak woodland and serpentine grassland habitats, with an emphasis on promoting serpentine-based plant species (including protected and typical plant species) and other associated plants that provide potential habitat for the federally threatened Bay checkerspot butterfly (BCB). Managed-grazing programs have been identified as a sound management tool in the recovery and management of serpentine species (Recovery Plan for Serpentine Soils Species of the San Francisco Bay Area, USFWS 1998 & conservation strategy in the Santa Clara Valley Habitat Plan, 2012). In addition to the management of primary serpentine habitat, the Plan will provide a guide for managing and improving habitat for other sensitive species, vegetation fuel loads, and pest plant encroachment, balanced with recreational access and enjoyment. Improvements that would need to be constructed would include livestock infrastructure elements such as perimeter and internal fencing, three types of gates (cattle movement gates, general vehicle access gates, and recreational access gates), and watering facilities to complement existing stock ponds, including water tanks, pumps, troughs and pipelines to provide supplemental water and improve cattle distribution. The intent is to install the cattle infrastructure (such as water sources and fences) away from the public use facilities to reduce potential conflicts. Similar to the roughly 17,000 acres of managed-cattle grazing currently occurring on County Park lands, these areas will remain open to the public. Santa Teresa County Park provides the department the opportunity to design and locate cattle grazing infrastructure to disperse grazing animals throughout the landscape while limiting their proximity to recreational facilities by utilizing features such as gates, trails, fencing, etc.
Attached are my comments on the proposed reroute of the Rocky Ridge Trail in conjunction with the Santa Teresa Grazing Management Plan.

I have been out of town for the last several weeks and have not had a chance to take a look at the file of additional information referenced in your notice of 5/14/13 so I don't know if it contains specific detail about the reroute.

My comments are based on earlier conversations with Greg about rerouting Rocky Ridge. I apologize in advance if my information is out of date and the proposed reroute will address the issues I raise in my comments.

Is the "file of additional information" available electronically/online or will I have to drive up to Garden Hill to review it?

Will I need to make any special arrangements to see it or can I just drop by?

thanks ... woody
These comments pertain to the proposed reroute for the Rocky Ridge Trail.

The segment of the Rocky Ridge Trail running from its junction with the Mine Trail to the switchbacks just beyond the puncheon has several problems and this reroute should be an opportunity to correct all of them. I’ve spent quite a bit of time working on Rocky Ridge over the past 6 or 7 years and these are the problems I’ve observed, broken down by sub-segment.

Sub-segment 1 - From the Mine junction to the sharp left turn.

This sub-segment parallels Santa Teresa Creek and the Mine trail which lies on the opposite side of the creek. It has two major problems.

The first is that there as several large seeps in the hillside above it and the trail becomes a quagmire during the rainy season. The Trail Crew has recontoured much of this sub-segment which has helped move water off it but the lower part of the trail still holds water and the entire sub-segment remains quite muddy following any sizable rain. Consequently users walk/ride off the sides of the trail when it is wet, creating a multi-track situation.

The second is that users wishing to access Rocky Ridge from Fortini or Style Ranch (and vice versa) have to traverse a short (approximately 1/4 mile) loop on this segment and Mine via the Mine/Rocky Ridge trail junction. The two trails parallel each other here and are separated by Santa Teresa Creek.

Many users are unwilling to make this arduous journey and have created several short-cut trails across Santa Teresa Creek. Park staff have for many years attempted to discourage this by erecting T-post and welded wire fencing along the creek but the fences are discontinuous, unsightly and users regularly knock them down. Recently Dan Clark erected a much sturdier fence across the main volunteer trail but I have little doubt that users will find another way around it. In addition to creating unsustainable volunteer trails, this activity disturbs Santa Teresa Creek which carries water much of the time and has fish and other aquatic life in it.

Sub-segment 2 - from the sharp left turn up to the puncheon.

This sub-segment parallels an un-named branch of Santa Teresa Creek up Big Oak Valley, making a moderate ascent to a serpentine outlook and dropping steeply down to the puncheon. It too has several major problems.

The first is that in closely following the creek branch, it is shaded during the winter months and the heavy clay soil doesn’t have a chance to dry out which leads to more multi-tracking.

The second is that the drop down to the puncheon is very short and very steep and is prone to badly erode. I believe there have also been several cycling accidents here over the years.

There are also several stands of Loma Prieta Hoita, *Hoita strobilina*, (endemic to Santa Clara and San Mateo Counties and listed CNPS 1B.1, S2) located creek side along this segment which could be subject to disturbance. Additionally the serpentine outlook above the puncheon, which serves as a frequent resting point for many users, contains a significant population of Santa Clara County Dudleya, *Dudleya*
*Abramstii ssp. setchellii*, a federally listed species (FE, CNPS 1B.1) found only in Santa Clara County. Unfortunately many of these are growing on the ground and since most users are unaware of their presence (if not their existence) they are sometimes trampled.

**Sub-segment 3 - the puncheon and lower leg of the switchbacks**

The puncheon itself is in good condition but the lower leg of the switchback is a disaster. There are several very large seeps in the hillside above it and every few years they dump a huge amount of water onto the trail, causing catastrophic erosion that wipes out much of the trailbed. Two or three years ago the Trail Crew reworked this sub-segment, installing several large grade reversals and drains. This held up for awhile but last winter, during which we had very little sustained rainfall, the water over-ran the grade reversals and again seriously eroded the trail bed. Even in years with little rainfall, this sub-segment’s northern exposure prevents it’s heavy clay soil from drying out making it difficult to traverse.

**Proposed Reroute**

I have been out-of-town for several weeks and have not had a chance to see the detailed documentation for the reroute but my understanding is that the current plan is

- to leave Sub-segment 1 in its current location
- to relocate the puncheon farther down the valley below it’s current location and to relocate Sub-section 2 to the south side of the creek where it will connect with Sub-segment 3
- to leave Sub-segment 3 (the lower leg of the switchbacks) in it’s current location.

I believe this would be a mistake for several reasons.

It would not address any of the problems on Sub-segment 1 (water retention, multi-tracking and cross-cutting Santa Teresa Creek) or of Sub-segment 3 (erosion on the lower leg of the switchbacks).

While it would eliminate the steep descent onto the puncheon on Sub-segment 2 but I fear it would, in all likelihood, make the water retention and multi-tracking on this sub-segment worse. The south side of the creek in this location also has several seeps on it and frequently becomes boggy. I’m afraid a reroute through this area would encounter much the same problems as does Sub-section 3 (the lower leg of the switchbacks).

**Suggested Modifications**

Most of the problems can be addressed by rerouting this segment of Rocky Ridge higher on the hillside, deeper into Big Oak Valley, and following the terrain’s natural contour.

This would move Sub-segment 1 above the seeps and away from Santa Teresa Creek, keeping it drier and discouraging cross-cutting the creek.

It would keep Sub-segment 2 on the north side of the Big Oak Valley creek branch, but move it farther uphill exposing it to more winter sunshine which should keep it drier and reduce multi-tracking as well as protecting the Loma Prieta Hoita and Santa Clara County Dudleya.
It should be possible to mitigate the problems with Sub-segment 3 by extending the trail up Big Oak Valley on the north side of the creek, past the current puncheon and bypassing the first leg of the switchback. This would mean moving the puncheon farther up the valley above it's present location.

I understand the desire to minimize the scope of the reroute (and any additional CEQA work), but this is the perfect opportunity to make significant and lasting improvements to one of the most heavily used trails in Santa Teresa.

I apologize in advance if my understanding of the reroute is out-of-date and these issues have already been addressed.
Response 2-4

In order to implement the suggestion of relocating the trail to a higher elevation and further into Big Oak Valley, new trail construction would be required in both riparian habitats and more serpentine grasslands. Not only would this impact the ability to manage the serpentine grasslands with cattle, it would also result in additional trail construction in serpentine grasslands. The County Parks Department's recommended re-route includes construction in annual grasslands and is adjacent to the riparian drip line.

Relocating the trail above Segment 1 and the seeps will result in new trail construction in serpentine grasslands, rock outcroppings and serpentine shrublands. The County Parks Department has addressed this section with rocking (a Court-ordered remediation from an illegal vehicle access and trespass on parklands). Additionally, the County Parks Department will be narrowing the trail to 4-6 feet in width to restrict vehicle access.

Constructing a new trail further into Big Oak Valley through serpentine shrublands and grasslands would be considered a take on species in serpentine habitats that would be subject to the Santa Clara Valley Habitat Plan permit restrictions and fees.

Relocating the trail to a higher elevation on Rocky Ridge would result in the construction of new trail on serpentine grassland habitat, and subject to Santa Clara Valley Habitat Plan restrictions and fees. The County Parks Department's recommended re-route ties the trail into existing trail system which has had annual volunteer events to reduce soil loss and maintain seeps and springs within their swales and not travel down the trail. This does result in impacted trails during the wet season. However, the County Parks Department has a trail closure process in place that closes trails access to mountain bikes and horses when the trails are in wet conditions, whereby mountain bikes and horses accessing the trails would leave a permanent depression on the trails.

Response 2-5
See 2-4