

Appendix A

Comment Letters

Oswalt, Caitlyn@Wildlife

From: Oswalt, Caitlyn@Wildlife
Sent: Monday, October 31, 2022 4:23 PM
To: Trails@Parks
Cc: Wildlife R2 CEQA; Wood, Dylan@Wildlife; Moeszinger, Patrick@Wildlife; Wilson, Billie@Wildlife
Subject: CEQA Comments for IS-ND FLSRA and FPSHP RTMP; SCH# 2022090416

Dear Mr. Jason Spann,

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Completion of an ND from California Department of Parks and Recreation for the Road and Trail Management Plan (Plan) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California’s **Trustee Agency** for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code., § 1802.) Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW’s lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in “take” as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required. CDFW also administers the Native Plant Protection Act, Natural Community Conservation Act, and other provisions of the Fish and Game Code that afford protection to California’s fish and wildlife resources.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the California Department of Parks and Recreation in adequately identifying and, where appropriate, mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

COMMENTS

1. On page 13, Section 2.6, Tier 1 Environmental Review, it states that the IS/ND is tiered off two separate CEQA documents. These documents include the Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park General Plan/Resource Management Plan and associated environmental impact report (EIR), as well as the

A01-01

Road and Trail Change-in-Use Evaluation Process and associated program environmental impact report (PEIR). This CEQA document should only be directly tiered off one document. Please clarify the tiering process of this IS/ND and how each document relates to each other.

**A01-01
cont.**

2. The CEQA document is declared to be an Initial Study with proposed Negative Declaration. CEQA allows for a “Mitigated Negative Declaration” in which mitigation measures are proposed to reduce potentially significant effects to less than significant (14 CCR § 15369.5). Since the Project would have impacts that would require mitigation to bring them down to less than significant, then declaring the CEQA document to be an Initial Study with a proposed Mitigated Negative Declaration would be more appropriate. To address this comment, CDFW recommends changing the CEQA document from an “Initial Study with proposed Negative Declaration” to an “Initial Study with a proposed Mitigated Negative Declaration”.

A01-02

3. Table 4.3-1, PLANTS-1, WILDLIFE-1 describes pre-screening for potential locations of new construction or site alteration activities. It states if avoidance of impacts to populations of special status species is not possible mitigation will be used as required and appropriate. Under a Negative Declaration the proposed project cannot have a significant effect on the environment that it would require mitigation to reduce the impacts to less than significant. If mitigation will be required for later tiered CEQA documents, consider changing this CEQA document to a Mitigated Negative Declaration.

A01-03

4. The Affected Environment section on page 60 of the IS/ND is based off the Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park General Plan/Resource Management Plan, published in June 2010. CDFW recommends using current conditions as the baseline for this IS/ND. This can be achieved through conducting a new Biological Assessment to ensure the biological baseline of this project is current. A current Biological Assessment will provide more accurate data for each project using this tiered IS/ND.

A01-04

5. Tables 4.3-2 and 4.3-3 on pages 62, 64, and 65 list the special-status plant and animal species that have the potential to occur within the boundaries of the Plan Area. This table is based on data provided in June 2010. A recent biological survey will produce a more accurate biological baseline. For this reason, CDFW recommends updating Tables 4.3-2 and 4.3-3 with more recent data.

A01-05

6. Page 67 section a, the IS/ND stated that to reduce impacts to less than significant the following measures were recommended within the IS/ND, GEN-4, BIO-3 through BIO-5, BIO-12 through BIO-17, and BIO-19 through BIO-21. Measure BIO-19 is for the flagging, fencing, and the monitoring of special-status plants. This type of measure is considered mitigation as without its implementation, significant impacts could occur to special status plant species. CDFW recommends changing section a from less than significant to less than significant with mitigation.

A01-06

7. Page 68 section c, states “all permit/agreement conditions would be implemented, reducing any potential impacts to a less-than-significant level.” Measures for biological resources that rely on future approvals or agreements as a means to bring identified significant environmental effects to below a level of significance are considered deferred mitigations. CEQA Guidelines §15126.4 (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. Because there is no guarantee that these approvals or cooperation with all of the involved entities will ultimately occur, the mitigation measures are unenforceable and do not reduce the impacts to biological resources to a less-than-significant level. CDFW recommends forming mitigation measures that are actionable and enforceable.

A01-07

8. The IS/ND has identified lakes, perennial, intermittent, and ephemeral rivers, streams, and other hydrologically connected aquatic features. The IS/ND did not analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned aquatic features and associated biological resources/habitats that may occur because of the Plan. Therefore, the IS/ND should propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level including but not limited to Plans impacts to water temperature, water nutrient concentrations, and turbidity.

A01-08

9. The IS/ND has identified Project activities that will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Notification is required for any activity that may do one or more of the following:
- a. Substantially divert or obstruct the natural flow of any river, stream, or lake;
 - b. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
 - c. Deposit debris, waste, or other materials where it may pass into any river, stream, or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Upon receipt of a complete notification, CDFW will determine if the Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. The Project as currently proposed in the IS/MND will require an LSA Agreement. An LSA Agreement will include measures necessary to protect existing fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, the IS/MND should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, minimization, mitigation, and monitoring and reporting commitments.

A01-09

ENVIRONMENTAL DATA

CEQA requires that information developed in mitigated negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

A01-10

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

A01-11

CONCLUSION

Pursuant to Public Resources Code §21092 and §21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the IS/ND to assist in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Caitlyn Oswald, Environmental Scientist at (916) 358-4315 or caitlyn.oswalt@wildlife.ca.gov.

Sincerely,

Caitlyn Oswald

(She/Her)

Environmental Scientist | 916.358.4315
North Central Region – Region 2
California Department of Fish and Wildlife



Central Valley Regional Water Quality Control Board

31 October 2022

Jason Spann
 California Department of Parks and Recreation
 PO Box 942896
 Sacramento, CA 94296
Jason.Spann@parks.ca.gov

COMMENTS TO REQUEST FOR REVIEW FOR THE NEGATIVE DECLARATION, FOLSOM LAKE STATE RECREATION AREA ROAD AND TRAIL MANAGEMENT PLAN, SCH#2022090416, EL DORADO, PLACER, AND SACRAMENTO COUNTIES

Pursuant to the State Clearinghouse's 22 September 2022 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Negative Declaration* for the Folsom Lake State Recreation Area Road and Trail Management Plan, located in El Dorado, Placer, and Sacramento Counties.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

A02-01

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

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cont.**

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

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cont.

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

A02-01
cont.

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter Minkel

Peter Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento

Robert H. Sydnor
AERC California State Trails Advocate
AERC Trail Master · Calif. Certified Engineering Geologist #968
916-335-1441 • RHSydnor@gmail.com



American Endurance Ride Conference

National Office: P.O. Box 6027 • Auburn, CA 95604
www.aerc.org • 866-271-2372 • office@aerc.org

Robert Hadley Sydnor
A.E.R.C. California Statewide Trails Advocate
RHSydnor@gmail.com 916-335-1441

October 28, 2022

**Subject: Comments on Public Review Draft
dated September 21, 2022 for
Road and Trail Management Plan
Folsom Lake State Recreation Area**

Dear California State Parks Officials:

attention: Ms. Alexandra Stehl, Strategic Planning and Recreation Services Division Chief; and Jason DeWall, Northern Field Division Chief

There are **significant legal flaws and errors** in this CEQA document dated September 21, 2022.

1. The State CEQA guidelines require that the **authors of the document be listed** in the rear pages of the report (just before any appendixes). Their full names, titles, street addresses, phone numbers, years of professional experience in CEQA preparation, and individual email address must be shown. Each author is required to be legally named in full, with their academic degrees listed by university, and it is required to show which chapters were authored by each person. It is **not legal** for a CEQA document to be cleverly “authorless.”

The backstory is that I am a **co-author** of the **State CEQA Guidelines**, and I was formerly in state civil service for three decades and am a CEQA specialist.

B01-01

2. When written public comment are received by California Department of Parks and Recreation, it is legally required to **publish these written comments in full**. My **three-page letter** dated February 28, 2022, cannot legally be **glossed-over** summarized in **one sentence**. My full letterhead, my full name, and all three pages are required to be published in an Appendix. That way, other members of the public (particularly equestrians and hikers) can read my scientific credentials, my state license numbers, and my three pages in full.

B01-02

3. Within the Superior Court of each county, several judges are especially trained in CEQA law. When there is a CEQA lawsuit, these cases are heard by these expert judges. CEQA laws are not randomly assigned to judges who specialize in criminal cases or civil law. Within Sacramento County, there are several Superior Court Judges who are experts in CEQA law. California Department of Parks and Recreation and their (incompetent) CEQA consulting planning firm (*cleverly* with no name, no authors), are **predestined to lose** in Sacramento Superior Court.

B01-03

4. To avoid this **legal failure**, it is recommended that California Department of Parks and Recreation **recirculate** the document dated September 21, 2022, with **second edition** perhaps dated December 2022, that has been editorially revised to correct legal errors. This new edition should have a minimum review period of **Sixty Days**, which essentially restarts the clock under CEQA rules.

B01-04

5. **Mountain bikers** are already **illegally using the Brown's Ravine Trail**. State Park signage has been deliberately **vandalized by mountain bikers**. State Parks officials have never (yet) arrested and cited mountain bikes on this trail. Illegal trail use and vandalism of official signs needs to be properly enforced.

B01-05

6. The **cell-phone reception** is limited and often dark along Brown's Ravine Trail. That means that it is not possible, in the event of a tragic emergency, to call 911 for emergency help, resulting from a serious crash between a horse and a fast-speeding mountain bike on a blind turn.

B01-06

An important safety mitigation measure would be for a cell-phone company (such as AT&T or Verizon) to install at **least three cell phone towers**. This will be highly useful for ambulance and rescue workers to respond in a timely manner when a crashed equestrian and/or mountain biker's life is at stake.

7. In routine communications, State Park Rangers will also benefit from three new cell phone towers in this area. This would help with emergency response to boating accidents and drownings. *So:* cell-phone towers would be a win—win situation for everyone. B01-07

8. There are several open-space areas that could be marked with a circled **H** white symbol so that rescue helicopters would know where to safely land. These circled **H** helicopter landing sites would need to be leveled by mechanical earth-moving machines (*e.g.*, bulldozers).
Besides the Brown’s Ravine Trail area, these **H** Helicopter emergency landing sites will also be highly useful boating accidents and near-drownings on this arm of Folsom Lake. Again, a win—win situation for public safety. B01-08

9. Elsewhere within Folsom Lake State Recreation Area, **mountain bikers** have illegally built bike-jumps that are hazardous and unsafe. Horses are prey animals so they will instinctively evade an abrupt encounter by a speeding mountain bike. Broken bones and broken necks typically result. Who will be **legally responsible** for the medical costs of these potential tragic accidents? Personal injury litigation for huge sums of money *may* result. B01-09

10. The future second edition of the Road and Trail Management Plan should consider the **safety** benefits of a **second parallel trail** that is dedicated to mountain bikes and e-Bikes. There should be no lateral passages between the two trail systems. That would avoid any “accidental” incursions of high-speed mountain bikes onto the safe horse trail. Fallen dead trees can be pulled into place to block any lateral passages. B01-10

11. **eBikes** are a known ***hazardous “gateway” for motorcycles*** and faster classes of eBikes. We need official signage to send these users to Prairie City State Vehicle Recreation Area. B01-11

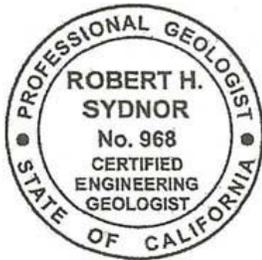
12. **Public safety** is of **paramount importance**. Public safety is not and cannot be cleverly relegated to a low-level of importance. This dilution will not prevail in Sacramento Superior Court. B01-12

13. A full-width mountain bike trail (essentially a jeep road) would also help to provide access to firetrucks in the event of a forest fire. This would increase public safety. Horrible forest-fires (like the nearby 2022 Mosquito Fire and 2021 Caldor Fire) are here to stay because of climate change. We need to **plan for fire safety. Detailed plans for controlled burns** need to be added to this document and scheduled after winter rains in January and February .

B01-13

Respectfully submitted,

Robert H. Sydnor



Robert Hadley Sydnor
A.E.R.C. California State Trails Advocate
A.E.R.C. Trail Master (*licensed trail maintenance*)
Fellow, Geological Society of America
Board Member, Mother Lode Unit
of Backcountry Horsemen of California



Mother Lode Unit PO Box 702, North Highlands, CA 95660-0702, bchcmlu.org

Subject: Comments on Public Review Draft for Road and Trail Management Plan Folsom Lake State Recreation Area.

BCHC Mother Lode Unit is **opposed** to any change in use trail designation in the Folsom State Recreation Area.

Listed in the section 1.1 under Purpose of the Road and Trail Management Plan. Public Review Draft, Sept 2022. 4 of some of your bullets are:

- Maximize visitor use and experiences
- Reduce potential safety issues
- Minimize impacts to natural and cultural resources
- Limit impacts on the natural environment to a level acceptable under CEQA/NEPA

Take **no action**, the CIU program is flawed.

- Browns Ravine Trail to Old Salmon Falls (separate standalone decision from RTMP)
- Los Lagos Trail
- Middle Ridge Trail
- Monte Vista Trail
- Pioneer Express Trail (various segments)
- Shady Trail
- Snipes Pershing Ravine Trail
- Snowberry Trail

Factors: Human Safety, User conflict, Habitat protection

Trail experience/ trail system – State Park Trail Planners should be looking at the use and trail experience each user group is after. Multi-use is and has been an outdated term for many years now. (multi-use originally was used to acknowledge bikes on the trail.) Branching out with better trail designs would be a safer transition to bring the trail systems up to date for the additional user groups. Slow user (foot, hoof) vs fast users (bikes), a parallel trail in some places would better support the trail system.

Bikes advertise moto cross with challenging banked turns, jumps with speed challenging courses. needing a faster trail design without the slower human and animal traffic. Folsom Lake SRA has proven unwilling or incapable of enforcing the long-standing no-bikes rule on Browns Ravine Trail, nor the 15-mph limit around the lake on other trails, so it's implausible to claim that there will be future enforcement of an added e-bike class-type.

B02-01

Law enforcement would not be able to discern a class 1 electric bike in the field from a Class 2, 3 or an electric bike that has been modified out-of-class. Hence Law enforcement would be non-existent.

B02-02

A portion of the trail needs to stay protected for the slower moving trail user to go without the risk of being hit by a racing faster moving user group. By adding mountain biking and electric bikes the CA State parks is disenfranchising the slower moving public sector by allowing this one user group access to all trails. There by removing any natural experience that the slower moving users are recreating to find.

B02-03

In Closing this document does not meet CEQA requirements because:

1. Authors by chapter, their credentials and emails addresses are missing just before the appendixes.
2. Public comments must be published in full (not summarized), along with the author's credentials.
3. The trail features are not accurately described (narrow tread with steep drop offs and numerous blind turns).

B02-04

B02-05

Respectfully,
Randy Hackbarth,
BCHC Mother Lode Unit President
trlryder@pacbell.net

From: rivenes@sbcglobal.net
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Friday, October 21, 2022 4:48:22 AM

n't often get email from rivenes@sbcglobal.net. [Learn why this is important](#)

To: California State Parks Email: trails@parks.ca.gov
Re: Folsom Lake SRA and Folsom Powerhouse SHP RTMP

Sierra Foothills Audubon Society has around 500 members in Placer County. It is the mission of the Sierra Foothills Audubon Society to educate ourselves and others to the variety and the beauty of our natural environment and to protect our wildlife and natural places.

We do not support allowing bikes on the sections of the Pioneer Express trail as detailed in:

- o ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing
- o BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment
- o BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road.

The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only. There are fewer and fewer safe trails where we are able to hike with our families and enjoy the outdoors without worrying about dangerous encounters with high-speed bikes.

It is highly probable that current users of the Pioneer Express will be disenfranchised if additional sections are opened to bicycles, especially where the trails are narrow, single track trails. When bikes are allowed on trails with other slower users, multi-use quickly becomes the exclusive use of the bikes.

The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. That part of the Pioneer Express Trail is multi use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe.

There are already issues with bikes riding illegally, or not following regulations and yielding to equestrians and hikers. There is nothing in the Plan as to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail safety reporting programs.

B03-01

B03-02

B03-03

Please do not make an exception to the passive recreation uses of these sections of the Pioneer Express trail that include walking and birdwatching.

Thank you for your consideration.

Don Rivenes
Conservation Chair
Sierra Foothills Audubon Society

**B03-03
cont.**

Rourke Healey

From: lbha@garlic.com
Sent: Saturday, October 29, 2022 3:41 PM
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP

Set forth below, please see comments on the above-referenced project from Loomis Basin Horsemen's Association.

Loomis Basin Horsemen’s Association (LBHA) is a 501(c)3 nonprofit corporation with a membership of 235 individuals. Our members are residents of Placer County. LBHA has reviewed the above-referenced project. Our comments, set forth below, will focus primarily on the subject of allowing bikes (which will include e-bikes, as designated through the Department’s e-bike policy) on the historical Pioneer Express Trail.

The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move supplies up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only. The majority of our membership consists of families who ride for pleasure and to enjoy nature’s beauty in a peaceful environment. There are fewer and fewer safe trails where families are able to ride, hike and run where they can enjoy the outdoors without worrying about dangerous encounters with high-speed bikes.

B04-01

The goals of the mountain bike community are totally the opposite than the goals of hikers, runners, dog walkers and equestrians. The main goal of bikers is speed. Even though bikers may not race each other physically, many record their times and post them online for others to see. Some then go out to see if they can better the time. Many bikers wear earbuds while they ride so they are often unaware of their surroundings. Bikers are looking down at the trail, as they must, to see where they are putting their wheels. This, combined with speed on downhill slopes, creates a dangerous condition for other trail users.

It is highly probable that current users of the Pioneer Express will be disenfranchised if additional sections are opened to bicycles, especially where the trails are narrow, single-track trails. When bikes are allowed on trails with other slower users, multi-use quickly becomes the exclusive use of the bikes. Trail usage in the Doton and Browns Ravine area, the Darrington Trail, and the Granite Bay Center Trail has changed. This is also true of the Forest Hill Divide Loop Trail. Traditional trail users have abandoned the trail due to safety and quality of life issues or use those trails only during weekdays when fewer bikes are using the trail. There are existing issues with bikes not following regulations and yielding to equestrians and hikers. The other existing conflict is that mountain bikers may be slow going uphill, but they are traveling at high speeds on the downhill side. There is no enforcement of current regulations.

B04-02

Even though Parks states one of their purposes is to “reduce potential safety issues,” the only mention of “trail safety” action is to “initiate education programs for trail users on proper trail etiquette and trail safety.” Education has been the only thing Parks has done about trail safety in the past 30 years. There is nothing in the Plan as to how Parks shall assign trail-specific rangers, institute enforcement of safety rules, or establishment of a public trail safety reporting program and a searchable database, or a system in which the public or Parks can return a trail to “hiker-horse” after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, to ensure bikes don’t travel at a high rate of speed.

B04-03

The bikes have lots of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn’t used by the equestrian community because high-speed bikes have made it unsafe.

B04-04

It is also problematic for families with young children because of high-speed bikes not yielding to hikers.

We are all citizens of Placer County who pay taxes to support whatever form of activity we prefer in our communities. However, that does not mean that all users should have access to all activities. Sometimes, it is simply not safe to combine some user groups. Combining slow moving users with high-speed users is unsafe. This is especially true on some of this trail which has poor sight lines, blind corners, and sharp curves with steep drop offs. The result of a bike and horse colliding on one of these areas is a spooked horse with nowhere to go but over the edge, causing probable death or serious injury to both horse and rider.

**B04-04
cont.**

If bikes want technical trails, where speed is possible without endangering other trail users, separate trails should be built to accommodate them. Horses are not allowed on all trails. We understand this is a safety issue and accept the fact that we can't go everywhere.

B04-05

The bikes need to understand that just because the trail is there, does not make it safe (for others) for them to be able to use it. Not at the expense of others' safety.

LBHA supports multi-use trails. An example of multi-use trails in our area supported by LBHA in recent years is Hidden Falls. These trails have been designed and constructed as multi-use trails. There are many other trails in our area which are suitable to be considered multi-use.

It is the opinion of LBHA that the Pioneer Express Trail does not meet the criteria of a multi-use trail. Much of the trail is single track with blind corners. There is simply nowhere for a horse and rider to go when meeting a bike on certain segments of the trail. It is for this reason that we do not support allowing bikes on the sections of the Pioneer Express Trail as detailed in:

- ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing
- BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment
- BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road
- BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1

B04-06

We do support the following:

- BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route
 - Officially signed as hiker/equestrian
- Adding facilities to Equestrian Staging Areas
 - BPGB#5 Granite Bay Horse Assembly area
 - NFAR #2. Rattlesnake Bar Equestrian Staging Area

Thank you for considering our comments. We are available to further discuss our concerns at any time.

Loomis Basin Horsemen's Association



Via Email
October 30, 2022

California Department of Parks and Recreation
Planning Division
Roads and Trails Program
trails@parks.ca.gov

Re: Folsom Lake State Parks Road and Trail Management Plan (RTMP)

Dear Planning Division:

The Folsom Auburn Trail Riders Action Coalition (FATRAC) Board of Directors thanks you for considering our prior comments throughout this RTMP process and including a number of trails within the Folsom Lake State Recreation Area (FLSRA) as part of the change-in-use (CIU) process. We particularly appreciate the separation of the Brown's Ravine Trail CIU, that was started many years ago, from the RTMP. It is also fantastic to see that the RTMP is being analyzed through an initial study and negative declaration, rather than a full-blown EIR. Please consider this letter as FATRAC's comments on the Draft *Folsom Lake SRA and Folsom Powerhouse SHP Road and Trail Management Plan and Initial Study/Negative Declaration*.

As a point of order, and suggestion for future public draft documents, we have significant concerns with the process by which the Planning Division and FLSRA publicized this September 2022 version of the RTMP (9/22 RTMP). Nowhere in the 9/22 RTMP does the Planning Division detail what changes were made between the May 2022 version of the RTMP (5/22 RTMP) and the 9/22 RTMP as is typical in California Environmental Quality Act (CEQA) and similar planning documents. After FATRAC reached out to Department of Parks and Recreation (DPR) staff, the changes between the two documents were summarized on the RTMP website. This was done approximately two weeks after the comment period on this 9/22 RTMP opened. While we appreciate that the 5/22 RTMP is not a CEQA document, and therefore DPR was not required to respond directly to comments, an explanation of why comments and suggestions made on that document were or were not included in the 9/22 RTMP would have been helpful and appropriate. Such an explanation would also make the process transparent for all interested stakeholders outside of DPR. We believe a transparent process helps improve stakeholder confidence in the decisions that are eventually made.

In correspondence with DPR staff, it was suggested that the volume of comments—i.e. the over 1,600 comments that FATRAC solicited on a change.org petition¹, plus many individual comments submitted by cyclists—on the 5/22 RTMP had minimal influence on DPR's decision making. This consolidated method was suggested to us by DPR's Deputy Director of the Strategic Planning and Recreation Services Division. FATRAC is of the view that this comment

¹As documented at the end of this letter. Gathering co-signatories was suggested as a more efficient method than lots of form letters or encouraging high volumes of similar versions of essentially the same sentiment

B05-01

volume clearly demonstrates a huge community interest in increased levels of bike-legal trails and features now and in the future as described in our comments.

We appreciate that some modest improvements were made in this 9/22 RTMP, including the alternating day pilot program on the Pioneer Express Trail between Beek's Bight and Auburn (NFAR #8, but see comments below), a bit more fleshing out of the plan for North Granite Bay (BPGB #4), the North Fork Low Water Route (BPGB # 10), and providing a bikepacking option in the Peninsula area (SFAR #1). We also appreciate the extension of the bells-on-bikes program parkwide, and are happy to assist with that. However, the RTMP still fails to provide a diverse range of experiences befitting a state *recreation* area. (Pub. Res. Code § 5019.56, subd. (a) ["Improvements [at state recreation areas] may be undertaken to provide for recreational activities, including, but not limited to, camping, picnicking, swimming, hiking, **bicycling**, horseback riding, boating, waterskiing, diving, winter sports, fishing, and hunting."].) It seems to rely on CIU or systemizing existing trails rather than building new trails (other than in the Peninsula area). FATRAC encourages DPR to also explore additional opportunities to build new progressive trails in addition to exploring CIUs and incorporation of existing user-built recreational facilities. Essentially we feel that DPR should catch up to other land managers in regards to new progressive trail building. The U.S. Forest Service does it. CalFire does it. The Bureau of Land Management does it. Even other management units within the DPR system do it on occasion (see: Culvert Trail in the Auburn State Recreation Area). FLSRA should do it too.²

**B05-01
cont.**

The RTMP provides an inadequate commitment to a bike park or skills loop to replace the bulldozed Granite Bay jumps. It fails to redesignate the Middle Ridge Trail as open to bikes, despite the available evidence showing that cyclists use Middle Ridge in significant numbers with few if any reported incidents, whereas it is used by very few horses.

Finally, and perhaps most importantly, most of the proposed increases in bike access have minimal, if any, real commitment to implement. Essentially they are left to DPR's discretion essentially as "we will get to this maybe someday." In comparison it has been over 20 years since the Brown's Ravine Trail CIU push kicked off. This RTMP process stalled out for most of a decade. FATRAC is concerned with DPR's track record on following through on things that it suggests "may" happen.

The RTMP is an appreciated but relatively modest step forward, especially given the realistic timelines for implementation. Considering how long it took to start this process, FATRAC is concerned that locking in this modest step forward for the next 20 or so years will be seen with hindsight as a missed opportunity to equitably and appropriately provide for the needs of the diverse and growing user base. Therefore, we urge you to do more related to progressive mountain bike access. Below are our specific comments and requests for changes to the 9/22 RTMP.

Specific Items in the Draft RTMP That Should Be Addressed

1. Lack of bike park or trail feature options. During the 2014 meeting between FATRAC and DPR, development of a bike park in the South Granite Beach area, or at least an area with technical features, was discussed. Although the 9/22 RTMP includes one reference (p. 2) to "exploring" development of a bicycle skills park or technical riding area, there appears to be no specific commitment to seeing such a feature built.

B05-02

² This comment does not only apply to state recreation areas. But it especially applies to state recreation areas.

There is an obvious need for advanced bike features demonstrated every time unauthorized bike jumps are built by the community, and subsequently bulldozed by land managers. This cycle is changing throughout the United States and in surrounding areas. One need only look at the wildly successful bike parks in Auburn and Fair Oaks to see how appreciated and well-used these features are. Both of those parks are on local park district land, and DPR does have experience with similar—though obviously different in many ways—parks through its OHV program. As a state recreation area, FLSRA is a perfect location for these kinds of activities to be strongly supported beyond just “explore the possibility of.”

**B05-02
cont.**

2. Lack of progressive trail options. Through this process, DPR has the opportunity to make FLSRA a true recreation area for all users—including cyclists who desire a more exciting trail experience. These types of bike-specific/potentially downhill/one-way trails are still not seriously explored in the 9/22 RTMP. These ideas should be incorporated into the final RTMP. Again, these are the types of trails, features, and activities that should be found in a state recreation area like FLSRA. The North Granite Bay/Hoffman Property has potential for these kinds of trails, as well as building trails from the ground up as purpose-built mountain bike trails/flow trails. It seems like DPR sees systemizing existing trails as satisfying this need, but as noted above FATRAC encourages additional consideration of building new trails ground up to meet the growing need. Build more and spread people out to satisfy recreation needs. This would be an are that the RTMP might more appropriately state as “explore the potential for progressive bike specific trails.”

B05-03

3. The Middle Ridge trail is slated for reconstruction but not slated for a change in use (LLN #15), and some of the trails connecting the bluffs with Lake Natoma may be removed (LLN #4). These popular trails help connect the state park to neighborhoods and local parks. FATRAC agrees Middle Ridge is narrow; however, it generally has good sight lines that would facilitate safe trail “interactions” between users. It also stands to reason that if it is wide enough to allow horses in two directions, it is certainly not too narrow to allow bikes. Based on an informal trail use survey performed from 6/1/2022 through 7/1/2022, FATRAC determined that horses rarely use this trail. Our trail use survey, using a trail camera, found that during this time period, the Middle Ridge Tail was used by 1033 pedestrians, 238 cyclists, and 3 equestrians.

The requested change-in-use does not preclude any users. It should also be noted that the Sacramento area is within a one- to three- hour drive of some of the most sought after federally-designated Wilderness in the country. Desolation and Granite Chief Wilderness alone provide over 90,000 acres, and hundreds of miles of trails that preclude bike access specifically. In contrast, there is one short trail (approximately 2 miles) on public land near Nevada City that is designated for bike access only. The suggestion that there are inadequate opportunities for bike-free experiences in the region is not supported by facts.

B05-04

We agree that some of the user-built bluff trails need additional work to be sustainable, but that work should be done, on at least a few, rather than decommissioning them or closing them completely.

The Middle Ridge Trail is a valuable recreational resource for Sacramento-area residents who wish to ride a loop around Lake Natoma or a shorter loop in that

immediate vicinity. A more comprehensive review for this area should be incorporated into the RTMP and the concept of reroutes and improvements left open at this time to ensure that more thought can be given to this matter to develop a coherent trail network that accommodates all user groups.

**B05-04
cont.**

4. LLN #4 - The Overlook trails that descend to the paved bike trail will be difficult to close to hikers and bikes if alternatives are not available. We suggest improving trail conditions to prevent erosion, also adding bike features to the lower dirt trail that parallels the paved trail from Nimbus Dam to the bottom of Shady Trail will encourage bikes to take that route instead of climbing up the steep fall line trails.

B05-05

5. FATRAC also looks forward to assisting with the plan for North Granite Bay trail network and assisting with evaluation of this existing recreational resource and incorporation of necessary trail reroutes. We request DPR place additional emphasis on the idea of *new* trail building in FLSRA. BPGB #4 contemplates incorporating/rerouting existing nonsystem trails “as well as any new trails necessary to meet plan objectives. This will include determining the uses on new trails...” However, only adopting user-built trails is not really enough here. DPR should set a precedent of supporting new trail building of sustainable trails with advanced technical trail features within this State *Recreation* Area.

B05-06

6. NFAR #7/NFAR #8 – FATRAC appreciates the changes in this area between the 5/22 RTMP and the 9/22 RTMP. But we are still concerned about the alternating day pilot project between Rattlesnake Bar and Auburn. First, this alternating day program is made completely dependent on the low water route between Beeks Bight and Rattlesnake Bar being “developed.” Second, that low water route may not be able to go all the way through because of bank gradient and rockiness. FATRAC requests that the alternating day idea be (1) not a pilot program, and (2) cover the entirety of the Pioneer Express Trail from Beeks Bight to Auburn to demonstrate that multi-use access around Folsom Lake is an appropriate priority in this RTMP. If that is not possible, connections between the low water route and the Pioneer Express Trail should be made to circumvent sections below the high water line that are too steep/rocky for a feasible route, and those Pioneer Express connector sections should be made bike-legal. FATRAC is willing to assist with site inspections and planning for this. We are also happy to assist with education, outreach, and implementation of the pilot program. We want any such program to be as successful as possible, and are confident that it can be.

B05-07

7. BR #5 - FATRAC requests FLSRA consider a new multiuse dirt trail between Folsom Point and Dike 7, with a loop around Folsom Point to help complete the dirt trail circumnavigating Folsom Lake with connections to paved bike trails as necessary. We note that the 9/22 RTMP proposes a paved trail for this connection, but FATRAC proposes the trail be dirt or at least have a parallel dirt trail. Prior to creation of the haul road such a narrow natural surface trail existed and is even shown on some historical maps.

B05-08

8. BR #9 - As with North Granite Bay, above, FATRAC appreciates that DPR plans to systemize non-system trails in consultation with user groups like FATRAC. However, as also with North Granite Bay, we request an emphasis be placed on building *new* trails to enhance user experiences.

B05-09

9. SFAR #6 - FATRAC supports re-engineering the beginning of the Darrington Trail to improve drainage and sustainability. However, we do not support routing around the rock

B05-10

outcropping that provides an excellent technical trail riding experience. We note no changes to this item in the 9/22 RTMP and restate this request. FATRAC suggests additional signage to direct trail users to the upper trail based on ability and the type of trail experience being sought.

**B05-10
cont.**

10. SFAR #13 - FATRAC notes that there is no incorporation of our request to build a short section of trail to connect Salmon Falls Raft take-out lot to the Salmon Falls Bridge. This seems like a simple and obvious improvement to this area that would take relatively little work for significant gain; especially if DPR has a goal of shifting users to park in that area. The best way to encourage additional use by trail users instead of the informal turnout by the bridge would be to build a multi-use trail from this lot to the Salmon Falls Bridge along, or slightly above, the high water line to make this a more desirable place to park. Simply “advertising and marketing” the raft lot is unlikely to increase use nearly as much or on a regular basis as adding a short trail segment.

B05-11

11. The RTMP proposes extending the paved trail to the Douglas entrance, using the rolling fire road along the shore of the lake (BPGB #8). FATRAC restates our concerns with this proposal from our June 2022 comments. We support the proposed paved trail. However, we suggest that a parallel dirt trail be developed, to the extent practical, in lieu of any gravel shoulders. This will provide a better user experience for almost all user types whether they are seeking a paved or dirt trail experience; almost none seeks a wider trail akin to a road. Such separation will also make it more reasonable to maintain natural shade along both trails, and will spread out users to minimize the sensation of crowding.

B05-12

Miscellaneous Additional Suggestions

In addition to our comments above, FATRAC suggests promoting Poppy Passes to volunteers by rewarding regular volunteers with complimentary parking passes or similar. This will both discourage use of informal parking areas and encourage stewardship.

FATRAC reiterates our dedication to continuing to help educate users on proper trail etiquette. This dedication has been demonstrated over the past 30 years through regular etiquette outreach campaigns, participation in the “slow and say hello” program organized by a local equestrian, participation and organization of several equestrian/mountain bike “desensitization” events, the ongoing bells-on-bikes program (recommended for expansion in the 9/22 RTMP), and participation in the Auburn State Recreation Area Trail Patrol. FATRAC looks forward to continuing such programs for years to come to help all users work together to share, maintain and enjoy our local trail systems.

B05-13

FATRAC reiterates our prior requests that FLSRA develop a plan to address, in the short term, facilitating basic trail maintenance and minor reroutes whose primary goal is to minimize/reduce risk of surprise encounters,³ reduce ongoing trail erosion, improve sustainability, and protect

³ FATRAC recognizes different user groups seek different qualities from their trail experiences. However, the vast majority of those qualities are the same whether you are riding a bike, a horse, hiking, running or viewing nature and wildlife. Nearly all users seek primitive natural surface trails, opportunity to disconnect from the stresses of everyday life, some level of solitude, and some level of adventure. There is an incredibly small number of safety issues or trail conflict. In 2012 State Parks confirmed this in “Trail Use Conflict Study, California State Parks Road and Trail Change in Use Evaluation Process” (https://www.parks.ca.gov/pages/980/files/app_c_trailuseconflictstudy_chginuse_draft.pdf). Further, the

nearby watersheds. With the recent and continuing growth in trail use in FLSRA, we implore DPR and FLSRA management, specifically, to prioritize immediate trail maintenance issues—including consulting local cyclists and allowing FATRAC to assist with volunteer work days. Mountain bikers consistently show up for local trail building activities. Since 2015 FATRAC has donated over 3,300 hours of volunteer labor conducting trail maintenance and construction, not to mention hundreds more hours in coordination, planning and training efforts for our local trails.

FATRAC reiterates our prior requests that DPR address the Trails Manual and Natural Resource Code. This is not specific to FLSRA, but FLSRA includes many examples that would benefit from both a sustainability and user experience standpoint from an updated Trails Manual. For example, in the Granite Bay area, an FLSRA trail crew widened and flattened various trail sections between Oak Beach and Beeks Bight in May 2020. After two and a half years of drought, many of those trail sections are more eroded than they were before and with a distinct dropoff on the downhill trail shoulder, resulting in an uneven and dangerous trail surface. Modernizing the Trails Handbook would ideally address issues like this. The California Mountain Bike Coalition has reached out to DPR several times to help facilitate this process.

**B05-13
cont.**

Conclusion

FATRAC appreciates the opportunity to participate in the RTMP process and we thank you for considering these comments and incorporating a number of our requests into the current 9/22 RTMP. We believe that the additional requests discussed above are reasonable, beneficial to all recreation users and the community surrounding FLSRA as a whole, and will help preserve park resources. We respectfully request that they become a part of the final RTMP.

If you have any questions or wish to discuss any aspect of our requests further please contact me at matt@fatrac.org.

Kindest regards,



Matt Wetter, FATRAC President

The following local organizations are also cosignatories to this comment letter*:

California Mountain Bike Coalition (<https://camtb.org/>)

Clipped-in-Races (<https://www.clippedinforlife.org/>)

Cycling Development (<https://www.cyclingdev.com/>)

Folsom Bike (<https://www.folsombike.com/>)

Freedom Riders Mountain Bike Camps (<https://www.freedomridersmtb.com/>) Friends of El Dorado Trail (<http://eldoradotrail.com/>)

Motherlode Trail Stewardship (<https://motherlodestewardship.org/>)

FLSRA-specific statistics provided at the Brown's Ravine CIU presentation show that conflict, and specifically safety issues, are exceedingly rare.

Prairie City Race Series (<https://racemt看.com/>) Bicycle
Trails Council of the East Bay (<https://btceb.org>)

*Confirmation available upon request

In addition over 1,650 community members were cosignatories to FATRAC's June 2022 comment letter on this RTMP

as presented on FATRAC's change.org petition at
[https://www.change.org/p/make-mountain-biking-better-in-california-state-parks?
utm_source=share_petition&utm_medium=custom_url&recruited_by_id=6e131b20-f34d-11ec-a2b5-
a9581bc2c089](https://www.change.org/p/make-mountain-biking-better-in-california-state-parks?utm_source=share_petition&utm_medium=custom_url&recruited_by_id=6e131b20-f34d-11ec-a2b5-a9581bc2c089)
CC:

Barry Smith, Goldfields District Interim Superintendent

Rich Preston, FLSRA Superintendent

Jim Micheaels, Gold Fields District Senior Specialist



16347 Stephenie Rd. Bakersfield CA 93314-9669

TO: California State Park Officials trails@parks.ca.gov astehl@parks.ca.gov

FROM: Backcountry Horsemen of California, Troy Patton, Vice President, Public Lands

SUBJECT: PUBLIC REVIEW DRAFT FOR ROAD AND TRAIL MANAGEMENT PLAN – FOLSOM STATE RECREATION AREA

Backcountry Horsemen of California is opposed to any change in use trail designation in the Folsom State Recreation Area. You state that you want to:

- Maximize visitor use and experiences
- Reduce potential safety issues
- Minimize impacts to natural and cultural resources
- Limit impacts on the natural environment to a level acceptable under CEQA/NEPA

B06-01

Yet, allowing bikes onto the trails violates all your stated purposes:

- You may get more people using the trails by allowing bikes, but you are ruining the outdoor experience for hikers and equestrians. No one wants to confront at bike doing 20 mph on a blind curve on a narrow trail.
- You will greatly raise the risk of injury to hikers and equestrians by allowing these high-speed bikes on the trails. There is little cell phone coverage on many trails, and many do not have access for emergency personnel when there is an incident, also there are no helicopter pads designated for emergency evacuation.
- It is a known fact that bike use means destruction of trails. The narrow wheels cut into the trails making ditches which cause washouts during the rainy season. On the banked turns, water is diverted to the inside of the trail which causes undermining of trails above it on switchbacks and causes washouts. The banks and jumps the bikes make also destroy the environment. It is proven that fast-moving bikes cause the wildlife to move away and not return to their habitat.
- Bikes are already illegally using these trails and doing great damage. Signage has been vandalized and there is no enforcement to see that the natural environment is being protected.

B06-02

We question whether this Change in Use Plan will stand up to legal review. This plan needs to be scraped and reworked to allow for trails that allow safe passage by all users. Multi-use trails have very specific guidelines which have not been addressed in this plan. The California State Parks' Best Practices states that design for multi-use trails is based on the highest standard for the intended user groups. Equestrian trails have the highest design and construction standards so those are the minimum standards for any multi-use trail. The plan should also address moving bike trails to an area that serves their needs and does not disenfranchise the other user groups.

B06-03

LAW OFFICE OF DONALD B. MOONEY

417 Mace Boulevard, Suite J-334

Davis, CA 95618

530-758-2377

dbmooney@dcn.org

December 14, 2022

**VIA ELECTRONIC MAIL AND
ELECTRONIC MAIL**
Trails@parks.ca.gov

Jason Spann
California Department of Parks and Recreation,
Recreation Planning Section
Attn: FLSRA and FPSHP RTMP
PO Box 942896
Sacramento, CA 94296-0001

Re: *Comments on Initial Study/Negative Declaration for the Proposed Folsom Lake State Recreation Area and Folsom Powerhouse State Historic Park Road and Trail Management Plan*

Dear Mr. Spann:

This office represents Ace4SafeTrails regarding the Proposed Folsom Lake State Recreation Area and Folsom Powerhouse State Historic Park Road and Trail Management Plan (“Project”). Ace4SafeTrails objects to the California Department of Parks and Recreation’s (“Parks”) approval of the Project on the grounds that the reliance on a Negative Declaration (“ND”) for the Project fails to comply with the requirements of the California Environmental Quality Act (“CEQA”), Public Resources Code section 21000 *et seq.*

A. CEQA REQUIRES THE PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Parks approval of the Project based on a negative declaration instead of an environmental impact report (“EIR”) would violate CEQA as substantial evidence supports a fair argument that the Project may have potentially significant impacts. CEQA was enacted to ensure environmental protection and encourage governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564.) CEQA requires full disclosure of a project’s significant environmental effects so that decision makers and the public are informed of consequences *before* a project is approved, to ensure that government officials are held accountable for these consequences. (*Laurel Heights Improvement Ass’n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) In the present case, substantial evidence supports a fair argument that the Project may have potentially significant impacts to public safety and biological resources.

B-7-1

Mr. Jason Spann
 December 14, 2022
 Page 2

An agency must prepare an EIR instead of a MND whenever a proposed project may have a significant impact on the environment. (Pub. Resources Code, § 21082.2(d) [“If there is substantial evidence, in light of the whole record before the lead agency, that a project may have a significant effect on the environment, an environmental impact report shall be prepared.”]) An agency’s decision not to prepare an EIR is judged by the “fair argument” standard of review. Under this standard, an EIR must be prepared “whenever it can be fairly argued on the basis of substantial evidence that the project *may* have significant environmental impact.” (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, emphasis added; *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1123.) Parks must prepare an EIR instead of an ND if there is any substantial evidence in the record supporting a fair argument that a project may have a significant effect on the environment, even if other substantial evidence supports the opposite conclusion. (Pub. Resources Code, § 21151(a); CEQA Guidelines § 15064(f)(1)-(2); *No Oil, supra*, 13 Cal.3d 68, 75; *Architectural Heritage Ass'n v. County of Monterey* (2004) 122 Cal.App.4th 1095, 1109.) It is the function of an EIR, not a negative declaration, to resolve these conflicting claims. (See *No Oil, supra*, 13 Cal.3d at p. 85.) The fair argument standard is a “low threshold” test for requiring the preparation of an EIR. (*No Oil, supra*, 13 Cal.3d at 84.)

B-7-1
 cont.

The requirement for an EIR cannot be waived merely because additional studies are required; in fact an agency’s lack of investigation “may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences.” (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311.) An ND is proper only if project revisions would avoid or mitigate the potentially significant effects “to a point where clearly no significant effect on the environment would occur, and . . . there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.” (Pub. Resources Code, §§ 21064.5, 21080(c)(2); *see also Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 331.)

Input from non-experts, lay testimony, can be substantial evidence when such testimony is credible and does not purport to embody analysis that would require special training. Thus, “statements of area residents who are not environmental experts may qualify as substantial evidence if they are based on relevant person observations or involve ‘nontechnical issues.’” (*Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 583 (aesthetics); *Ocean View Estates Homeowners Association, Inc. v. Montecito Water District* (2004) 116 Cal.App.4th 396, 402 (aesthetics); *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322 (traffic and biology); *The Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 932 (land use); *Oro Fino Gold Mining Corp v. County of El Dorado* (1990) 225 Cal.App.3d 872, 882 (noise); *Citizens Association for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151, 172 (traffic).)

B-7-2

Mr. Jason Spann
 December 14, 2022
 Page 3

In the present matter, Parks seeks to adopt a Road and Trail Management Plan (“RTMP”) that describes the existing roads and trails at Folsom Lake State Recreation Area (“FLSRA”) and Folsom Powerhouse State Historic Park (“FPSHP”) and provides specific direction for their future development, management and operation. Comments submitted by California Department and Fish and Wildlife and members of the community supports a fair argument that the Project may have significant impacts to biological resources and public safety. Additionally, as discussed in the comments submitted by the California Department of Fish and Wildlife (“CDFW”), Parks has improperly tiered off of old EIRs without having made the requisite findings. Also, the conditions on the project require mitigation measures that the IS/ND fails to properly identify as mitigation measures. Thus, Parks improperly relies upon a negative declaration as opposed to a mitigated negative declaration.

B-7-3

A. The IS/ND Failed to Comply With CEQA’s Requirements Regarding Use of Tiered EIR.

The Initial Study/Negative Declaration (“IS/ND”) tiers off two EIRS: 1) EIR/EIS for the *Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park General Plan/Resource Management Plan* was adopted on October 8, 2009, by the California State Park and Recreation Commission; AND 2) a Program EIR approving the *Road and Trail Change-in-Use Evaluation Process* certified on May 2, 2013. Parks, however, fails to comply with Public Resources Code section 21157.6 and CEQA Guidelines section 15179 which provide that if the later project is more than five years after the master EIR was certified, the lead agency must review the adequacy of the master EIR. If the agency finds that no substantial changes have occurred and new information is not available, the agency is not required to prepare a subsequent of supplemental EIR. (§ 21157.6(b)(1).) If the agency cannot make that finding however, it must either prepare and certify a subsequent or supplemental EIR, or adopt a mitigated negative declaration. (§ 21157.6(b)(2).) In the present case, Parks has not made the findings required by CEQA and the CEQA Guidelines regarding the outdated EIRs that the IS/ND tier off of. This failure becomes all the more evident given the comments submitted by CDFW’s comments dated October 31, 2022. CDFW points out that the affected environment section on page 60 of the IS/ND is based off the Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park General Plan/Resource Management Plan published in June 2010. CDFW points out that “a current Biological Assessment will provide more accurate data for each project using the tiered IS/ND.” CDFW also comments that Tables 4.3-2 and 4.3-3 in the IS/ND (pp. 62, 64-65) list the special-status plant and animal species that have the potential to occur with the boundaries of the Plan Area.” The tables are based on data provided in June 2010. CDFW comments that “a recent biological survey will produce a more accurate biological baseline.” CDFW’s comments highlight the need to make a finding that no substantial changes have occurred and new information is not available as required by Public Resources Code section 21157.6 and CEQA Guidelines section 15179. Parks

B-7-4

Mr. Jason Spann
 December 14, 2022
 Page 4

failure to comply with section 21157.6 constitutes a prejudicial abuse of discretion and is contrary to law.

B-7-4
 cont.

B. Parks’ Fails to Identify Mitigation Measures That Reduce or Avoid the Impacts to Less Than Significant

Any action that is designed to minimize, reduce or avoid a significant environmental impact or to rectify or compensate for impacts constitutes a mitigation measure. (CEQA Guidelines, § 15126.4.) Mitigation measures must be either incorporated into the design of the project or be fully enforceable through conditions, agreements, or other means. As discussed by CDFW, the IS/ND states that to reduce impacts to less than significant the IS/ND recommends that compliance with the following measures: GEN-4, BIO-3, BIO-12 through BIO-17, and BIO-19 through BIO-21. These constitute mitigation measures, but the IS/ND fails to identify them as such.

B-7-5

C. The IS/ND Relies Upon Deferred Mitigation Measures

As discussed by CDFW the IS/ND relies upon deferred mitigation contrary to the CEQA’s requirements. requirements, the IS/ND states “all permit/agreement conditions would be implemented, reducing any potential impacts to a less-than-significant level.” (IS/ND at 68.) CEQA prohibits the deferral of mitigation measures. A mitigation measure violates CEQA if it “is devoid of criteria for measuring the effectiveness of mitigation measures.” (CEQA Guidelines, § 15126.4, subd. (a)(1)(B); see *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306-307 [improper to defer formulation of mitigation measures until after project approved].) The general rule against deferred mitigation bars “loose or open ended performance criteria.” (*Rialto Citizens for Responsible Growth v City of Rialto* (2012) 208 CA 4th 899, 945.).

B-7-6

In the present matter, the measures for biological resources rely upon further approvals or cooperation. However, there is no guarantee that such approvals or cooperation with all of the involved entities will ultimately occur, the mitigation measures are unenforceable and do not reduce the impacts to biological resources to a less-than-significant level. (See IS/ND at 68.).

D. THERE ARE SIGNIFICANT SAFETY ISSUES REGARDING HIKER AND EQUESTRIAN SAFETY

CEQA has long recognized that an environmental document must address project’s potential impacts to pedestrian safety. (See e.g. *City of Maywood v. Los Angeles Unified School District* (2012) 208 Cal.App.4th 362; *El Morro Community Assn. v. California Dept. of Parks and Recreation* (2004) 122 Cal.App.4th 1341.) In the present matter, it is not the traditional pedestrians in the sense of an urban environment that are impacted by the Project, but the hikers and equestrians due to the change in use for many of the trails that will now allow mountain bikes to use the same trails. Substantial evidence in the record supports a fair argument that the change in use to allow

B-7-7

Mr. Jason Spann
 December 14, 2022
 Page 5

mountain bikes on trails that were previously limited to hikers and/or equestrians may have significant impacts to safety. Allowing the use of mountain bikes on these trails will result in significant impacts to safety. Mountain bikers not only use the trails in different ways but use them at different speeds and intensity. Hiking and equestrian use is predominately leisurely, contemplative and pastoral as opposed to mountain biking which is about strength, endurance, challenges and tests of skill, as well as thrill seeking and high speeds.

B-7-7
 cont.

Numerous studies and news accounts over the years have discussed the potentially significant impacts to hikers and/or equestrian when they must compete for space on trails.

Board of directors of the Medical Society of Metropolitan Portland: In Forest Park, biking and hiking don't belong together;

http://www.oregonlive.com/opinion/index.ssf/2010/06/in_forest_park_biking_and_hiki.html

California Recreational Trails Committee; User conflicts and accidents from bikes on multi-use trails

<http://www.parks.ca.gov/pages/1324/files/crtc%20minutes%2011-13-08.pdf>

Chronology of growth of User Conflicts on Santa Barbara Front Country Trails System; USDA

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5097666.pdf

Supervisors tackle Marin Trail conflicts, by Mark Prado

<http://www.marinij.com/general-news/20091103/supervisors-tackle-marin-trail-conflicts>

NBC Bay Area News; Little Enforcement for Dangerous Behavior on Mount Tamalpais.

<http://www.nbcbayarea.com/news/local/Little-Enforcement-for-Dangerous-Behavior-on-Mount-Tamalpais-377975091.html>

Marin: Bikers Damage Trails, Bully Hikers, Horses – San Francisco Chronicle Opinion

<http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/1999/07/02/NB49806.DTL>

Conflict on Marin County Trails Returns to the Spotlight – SF Chronicle

<http://www.sfgate.com/bayarea/article/Conflict-on-Marin-County-trails-returns-to-6119944.php>

More Illegal Trail Building and Bike Riding in Sensitive Off-Limits Bike Trail in Marin County Open Space

B-7-8

Mr. Jason Spann
December 14, 2022
Page 6

<http://trailkillerz.blogspot.com/search?updated-min=2010-01-01T00:00:00-08:00&updated-max=2011-01-01T00:00:00-08:00&max-results=10>

Santa Venetia's Illegal Bike Problems.

<http://trailkillerz.blogspot.com/search?updated-min=2009-01-01T00:00:00-08:00&updated-max=2010-01-01T00:00:00-08:00&max-results=13>

Personal Encounter with biker riders and horse

<http://horseandman.com/handy-tips/bicycles-and-green-horses-on-the-trail-together-oh-my/>

Injured rider comes home to family

<http://changemy--life.blogspot.com/2012/10/hurt-rider-comes-home-to-her-family.html>

Altadena: Karin Bugge, Biker vs. Hiker On the Way to Echo Mountain

<http://altadena.patch.com/articles/biker-vs-hiker-on-the-way-to-echo-mountain>

Bikers and green horses don't mix on trails.

<http://horseandman.com/handy-tips/bicycles-and-green-horses-on-the-trail-together-oh-my/>

Husband and wife thrown from horses caused by speeding mountain biker

http://www.paloaltoonline.com/weekly/morgue/cover/2000_Jun_28.BIKERCOV.html

Mountain Bikes and Wilderness Don't Mix - High Country Times

<https://www.hcn.org/wotr/mountain-bikes-and-wilderness-dont-mix>

Concerns about lawsuits have prompted the state to rip apart a number of illegal mountain bike trails and jumps in Whatcom County. - Seattle Times

<http://www.seattlepi.com/local/komo/article/State-removes-illegal-biking-trails-jumps-from-3457433.php>

Arizona BCH requests National Forests to separate bikes from horses

<http://www.bchcaz.org/images/articles/Resolution%20Regarding%20Mountain%20Bike%20Use%20on%20Non%20Moto.pdf>

Hiker v Biker: Altadena: Karin Bugge, Biker vs. Hiker On the Way to Echo Mountain Altadena, CA 2012 User conflicts and safety issues

<http://altadena.patch.com/articles/biker-vs-hiker-on-the-way-to-echo-mountain>

Bikers and equestrians say neigh to sharing trails at Fort Custer MLive.com

B-7-8
cont.

Mr. Jason Spann
December 14, 2022
Page 7

http://www.mlive.com/news/kalamazoo/index.ssf/2010/07/bikers_and_equestrians_say_nei.html?mobRedir=false

Outlaw Bikers In Rock Creek Park, Illegal Mountain Biking Spooks Hikers and Horses

<http://www.washingtoncitypaper.com/articles/9353/outlaw-bikers/>

MT. BIKERS vs EQUESTRIANS: An explanation of horses to bikers – written by a biker

<https://www.horseandman.com/handy-tips/mt-bikers-vs-equestrians-explanation-horses-bikers-written-biker/01/26/2014/>

6 Solutions for Managing Multi-Use Trails and Conflict

<https://www.americantrails.org/resources/multi-use-trails-and-conflict>

As a result of significant environmental and public safety impacts of allowing mountain biking on hiking and equestrian trails, other than on dedicated fire roads, numerous public agencies and municipalities have banned mountain biking on all hiking trails. These uses are simply incompatible on single track trails. The following references provide information on some of those bans.

Battle of wheels: A mountain bike ban in a Santa Cruz Park could be a signal of more to come; LA Times

<http://articles.latimes.com/2005/jan/25/news/os-bike25>

MROSD district lands: Trail tension: Battle brews between bikers and hikers in the foothills; Palo Alto Online

http://www.paloaltoonline.com/weekly/morgue/cover/2000_Jun_28.BIKERCOV.html

Los Angeles Parks ban on biking holds in City action to ban biking on hiking trails

<http://thequestriannews.com/2011/04/19/1-a-city-ban-on-trail-biking-holds/>

B-7-8
cont.

Mr. Jason Spann
December 14, 2022
Page 8

Additionally, a number of California agencies, including Parks have passed bans on mountain biking on hiking trails.¹

- Big Basin State Park (bikes permitted on fire roads only), CSP, Santa Cruz County
- Bolinas Lagoon Preserve, Audubon Canyon Ranch, Marin County (no bikes on trails)
- Butano State Park (bikes permitted on fire roads only), CSP, San Mateo County
- Calero County Park (no bikes permitted on any trails), SCCP, Santa Clara County
- Castle Rock State Park (no bikes permitted on any trails), CSP, Santa Cruz County
- Cataract Trail (no bikes on the trail), Mount Tamalpais (Marin Municipal Water District), Marin County
- Coal Mine Ridge, Portola Ranch Homeowner's Association, San Mateo County
- Fall Creek Unit, Henry Cowell State Park (no bikes permitted on any trails), CSP, Santa Cruz County
- Hidden Villa, Santa Clara County
- Huckleberry Botanic Regional Preserve (no bikes permitted on any trails), EBRPD, Contra Costa County
- Indian Tree Open Space Preserve (bikes are permitted only one trail; others restricted), MCOSD, Marin County

B-7-8
cont.

¹ Legend:

CCWD=Contra Costa Water District
CSP=California State Parks
EBRPD=East Bay Regional Park District
MCOSD=Marin County Open Space District
MROSD=Midpeninsula Regional Open Space District
MWNM=Muir Woods National Monument
PRNS=Point Reyes National Seashore
SCCP=Santa Clara County Parks
SMCPD=San Mateo County Parks Department

Mr. Jason Spann
December 14, 2022
Page 9

- Junipero Serra County Park (bikes only permitted on park roads; no bikes on trails), SMCPD, San Mateo County
- La Honda Open Space Preserve, MROSD, San Mateo County
- Loch Lomond Recreation Area, City of Santa Cruz, Santa Cruz County
- Los Trancos Open Space Preserve, MROSD, San Mateo County
- Los Vaqueros Watershed (no bikes permitted at the County Line Staging Area, south end of the watershed), CCWD, Contra Costa County
- Maurice Thorner Memorial Open Space Preserve (no bikes permitted on the preserve's trail), MCOSD, Marin County
- Miller/Knox Regional Shoreline (no bikes permitted on the trails in the park's eastern section), EBRPD, Contra Costa County
- Mount Madonna County Park (no bikes on park trails), SCCP, Santa Clara County
- Muir Woods National Monument (no bikes permitted on any trails), MWNM, Marin County
- Napa River Ecological Reserve (no bikes permitted), California Department of Fish and Game, Napa County
- Olompali State Historic Park (no bikes permitted on any trails), CSP, Marin County
- Palomarin Trailhead (no bikes south of Wildcat Camp), PRNS, Marin County
- Pichetti Ranch Open Space Preserve, MROSD, Santa Clara County
- Pulgas Ridge Open Space Preserve, MRSOD, San Mateo County
- Portola Redwoods State Park (allowed on paved roads only), CSP, San Mateo County
- Rush Ranch Open Space Preserve (no bikes permitted on any trails), Solano Land Trust, Solano County
- Sanborn-Skyline County Park (no bikes permitted on any trails), SCCP, Santa Clara County
- Sonoma Coast State Beach (includes Kortum Trail and Bodega Head), CSP, Sonoma County
- Thornewood Open Space Preserve (no bikes permitted on the one trail), MROSD, San Mateo County

B-7-8
cont.

Mr. Jason Spann
December 14, 2022
Page 10

- Tomales Bay State Park, CSP, Marin County (no bikes on trails, bikes ok on paved park road)
- Tomales Point Trailhead, Point Reyes National Seashore (no bikes on the trail).
- Uvas Canyon County Park (no bikes permitted on any trails), SCCP, Santa Clara County
- Villa Montalvo County Park (no bikes permitted on any trails), SCCP, Santa Clara County
- Westwood Hills Park (no bikes permitted on any trails), City of Napa Parks and Recreation
- Wilbur's Watch (no bikes permitted), Peninsula Open Space Trust
- Wunderlich County Park (no bikes permitted on any trails), SMCPD, San Mateo County

A number of other state agencies have also banned mountain biking on hiking trails.

Hidden Villa Farm and Wilderness Preserve

<http://www.bahiker.com/southbayhikes/hiddenvilla.html>

Ohlone regional wilderness, CA

<http://www.ebparks.org/parks/ohlone>

L.A. City Parks:

<http://www.theeastsiderla.com/2011/03/park-advocates-set-up-last-minute-road-block-against-mountain-bikers/>

Arches National Park

<http://www.utah.com/bike/trails/arches.htm>

Canyonlands National Park

<http://www.utah.com/bike/trails/canyonlands.htm>

Great Smoky Mountain National Parks

http://www.hikinginthemokys.com/bicycling_smoky_mountains.htm

Mt. Rainer

http://www.google.com/url?sa=t&rct=j&q=&esrc=s&frm=1&source=web&cd=72&ved=0CDAQFjABOEY&url=http%3A%2F%2Fwww.rainiervisitorguide.com%2Fbiking_guide.html&ei=7LN3T4KdEuKoiAfM5JHtBA&usg=AFQjCNEU4k3rcA0P5d_XZb8l6V3Cnoc2cQ&sig2=V5KxsdS_XnlvZBT1m9AvQ

B-7-8
cont.

Mr. Jason Spann
December 14, 2022
Page 11

Green Belt Park NPS

<http://www.rundc.com/Doc/MD/PG/GreenbeltPark.htm>

State of California Department of Parks and Rec. Goldfields District, Folsom Sector

<http://www.garlic.com/~lbha/Pioneer%20Express%20Trail%20Use%20Designation%20Order.pdf>

Michigan Shore-to-Shore Trail:

http://en.wikipedia.org/wiki/Michigan_Shore-to-Shore_Trail

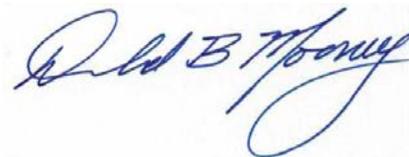
B-7-8
cont.

E. CONCLUSION

As set forth above, the IS/ND does not meet CEQA's requirements for a Negative Declaration. Moreover, the record before Parks supports a fair argument that the Project may have a significant impact to biological resources and the safety of hikers and equestrians. As such, CEQA requires the preparation of an Environmental Impact Report for the Project and approval of the Project based upon a negative declaration would constitute a prejudicial abuse of discretion.

B-7-9

Sincerely,



Donald B. Mooney
Attorney for Ace4SafeTrails

cc: Clients

From: [Cathy Godwin](#)
To: [Trails@Parks](#)
Cc: [Catherine Godwin](#)
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Saturday, October 29, 2022 9:47:12 AM

't often get email from catherinejgodwin@gmail.com. [Learn why this is important](#)

To whom it may concern,

The absence of safety data does not mean that something is safe. I do not believe that it is possible to safely modify the Browns Ravine trails to a single track multiuse trail. This includes the assumption that State Parks will continue their modest patrol of this area.

I have observed that bikers tend to be short sighted while navigating challenging trail footing. And many bikers are looking for a challenge on lesser used and infrequently patrolled trails. I would like to mention this issue is not horse specific. A cyclist would need to navigate all trail users such as a hikers, families and yes, even other cyclists .

Here is my account of my equine vs cyclist near miss experience.

In the fall of 2018, a cyclist came within two feet of my horse. Despite a good line of site, he could not hear my warning shouts due to his earbuds. (Our line of sight was a good 100 feet.) He was concentrating on the path; he did not look up in time to stop his rapid descent. With no where for to go, my horse and I stood still and held our ground. The cyclist had to ditch into the hillside as he too did not want go off the downhill side. Lying on the ground next to my horse, I had to step forward to allow him room to right his bike. He had significant abrasions and was apologetic. He declined my offer of assistance, rode off and perhaps had a learning moment.

Include bikes on the Brown Ravine area trails because there is no evidence of unsafe conditions is not meaningful. This area has not been patrolled and a group of illegal users know this and have chosen to disregard posted State Park regulations.

Please do the right thing and follow the legal processes to conclude that this modification is not in the best interest to the whole community.

Thank you for your consideration of my concerns.
Respectfully submitted,
Catherine Godwin



I01-01

Rourke Healey

From: christine zink <chris2865@gmail.com>
Sent: Saturday, October 29, 2022 1:24 PM
To: Trails@Parks
Subject: Folsom Lake SRA&Folsom Powerhouse SHP

[You don't often get email from chris2865@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I oppose the Pioneer Express trail change The trail is narrow, single track with steep cliffs and numerous blind corners. It would be a safety hazard to combine bikes of any category with hikers and equestrians I use these trails twice per week and know that there are many sections of these trails are very dangerous to mix bikes and and equestrians Thank you Christine Zink Auburn Ca

I02-01

Sent from my iPhone

From: [Colleen Mahaffey](#)
To: [Trails@Parks](#)
Subject: Rattlesnake State Park
Date: Wednesday, October 19, 2022 11:20:35 AM

n't often get email from cmahaffey@ncbb.net. [Learn why this is important](#)

My concern with enhancement of the trails and additional traffic to Rattlesnake area is fire. I have lived off Rattlesnake Road for over 25 years and use the trails daily. I have never seen any forest management conducted. The increased trail use also increases the fire risk. Fire prevention needs to be addressed. In the evening, I see trailers, (boat and horse) going by with dragging chains sending sparks everywhere. Rattlesnake is probably the most neglected park in the SRA.

I03-01

Additionally, mountain bikes from Rattlesnake to Auburn are not appropriate. I have had too many dangerous encounters between Rattlesnake and Averys Pond and between the 50 – 53 mile marker. The sound from the river drowns out noise and a biker is upon a person at top speed and neither saw each other until the last minute. Because of unauthorized bikes on this stretch of trail I now walk my horse starting around the 50 mile marker to 53.

I03-02

Happy trails!
Colleen

Colleen Mahaffey-Raty
Whirlwind Ranch
916-768-9126
www.whirlwindranch.com

From: [Cynthia Boriskin](#)
To: [Trails@Parks](#)
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Tuesday, October 4, 2022 2:03:07 PM

[You don't often get email from cboriskin@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Any changes to the current pedestrian/horse trails can be very dangerous and accidents waiting to happen. Many of the current trails marked for pedestrian/horse trails is for safety reasons. With blind corners, rocky footing and single track trails, it can be dangerous for all users. Bicyclists coming around blind corners at any speed can spook horses, even the most trained horse can be affected. Trying to turn around or get off the trail to make room for passing can be a huge problem for everyone especially those with bikes. I feel making changes to the trail usage, is unnecessary and dangerous.

Cynthia Boriskin
Bicyclist, hiker and equestrian.

Sent from my iPhone

I04-01

From: [Laurene and Dave Davis](#)
To: [Trails@Parks](#)
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Sunday, October 30, 2022 3:37:23 PM

't often get email from laureneanddave@gmail.com. [Learn why this is important](#)

alifornia Department of Parks and Recreation,
Recreation Planning Section
Attn: FLSRA and FPSHP RTMP
P.O. Box 942896
Sacramento, CA 94296-0001
• trails@parks.ca.gov

Re: Folsom Lake SRA and Folsom Powerhouse S

I oppose the proposed changes to allow mountain bikes on the historic Pioneer Express Trail between Granite Bay and Beeks Bight and farther on to Auburn. This is a safety issue. The trails are not safe for bikes and horses to meet. The sharp corners, lack of distance visibility and steep drop offs combined with the speed of bikes creates a disaster in the making. Please consider the safety of the trail goers, hikers and equestrians, in considering this change.

I05-01

There are many trails in the area that are multi use and are appropriate for bicyclists. The areas of Cool, Cronin and Magnolia are examples of wide trails that can accommodate multiple types of users. The single track trails at Folsom Lake State Recreation Area are not safe for these users to mix.

I05-02

Please consider the safety issue when studying these changes.

Thank You

Dave Davis

Newcastle, CA

laureneanddave@gmail.com

COMMENT LETTER # I06

From: [Dave Higgins](#)
To: Trails@Parks
Subject: Unsafe trails
Date: Friday, October 7, 2022 11:24:05 AM

[You don't often get email from dkhiggins77@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

My husband and I are senior citizens.
We love walking the trails . However we feel the trails have been too dangerous for us to continue enjoying them.
Several times there has been some very close collisions with fast moving rude bicycle riders. Bikes and people are not a good mix!
They need to separate for safety!

I06-01

I live on Young Wo Circle,Folsom. There is a entry to the state trail at the bottom of the streets circle. Many outside people not from Folsom are parking on our streets unloading their water boats. Sometime trucks and trailers with up to six paddle boards. We have to pick up garbage daily from all the usage it gets. Let alone the blasting music. Homeless park on the street and sleep on the state property overnight. I would like to see more policing over the area.

I06-02

Thanks
Kim Higgins's
Sent from my iPhone

From: [DEBBIE MURPHY](#)
To: [Trails@Parks](#)
Cc: [Debbie Murphy](#)
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Tuesday, October 4, 2022 2:53:23 PM

Re: Folsom Lake Trails

E Bikes and the like(powered equipment) would be DEADLY if allowed on single track trails such as Pioneer Express or any other trail within the State Park. Motorized equipment of any kind has shown to be detrimental to the safety of equestrian and pedestrian usage as well as destructive to trails.Call them bikes if you like, however they ARE motorized and DO NOT belong on State Park trails or access trails. The very spirit of the State Park is to enjoy the area peacefully, on foot or horseback, as originally intended by the founders .

Giving in to a lobby of bikers(pedal or motorized) is very weak minded . There are enough issues with bikers disrespecting the trail usage without allowing motorized equipment.

I am a very long time trail user in Folsom and Auburn area. I've given countless hours to Mounted Trail Patrol, managed equestrian events and volunteered hours in FSRA.

I am very displeased with the direction FSRA is headed and implore you to consider what was intended for the park usage. Safety of pedestrians and equestrians must be a priority.

Deborah Murphy

Sent from my iPhone

I07-01

COMMENT LETTER # I08

From: [Deborah Butler](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP"
Date: Thursday, October 20, 2022 11:24:15 AM

Hello-

I am a equine rider who uses Folsom Lake 4 days a week to ride and enjoy the lake. I have come across many bike riders who just speed past us, verses, dismounting and allowing the horse to walk past the bike. I have also been on many rides where the horse companion was scared and spun and rider fell off due to the bikes on the equine trails and having ear pods and not looking up to see who is on the trail with them. I honestly feel that the park should be making separate trails for equine and bikes so that each of the sports can totally enjoy without running into each other. On the Pioneer Express trail when encountering bikers they have an attitude when you tell them they are on the wrong trail. They know they are but with no reinforcement, no one cares that they are breaking the rules.

Many of us equine riders do bring our green horses out to train them and having bikes on the same trail makes the young horse nervous and scared. Horses do remember encounters and makes this difficult for the owner who is training to expose their young horses to the environment.

I would hope that Folsom Lake would really consider having separate trails for both sports. I am in my 70's still activity riding and I have been riding these trails for 30 years and the bikes on the horse trails are creating a surface which is very unsafe to ride on with all the ruts from the tires.

Regards,
D Butler

I08-01

From: [DENNIS STROINEY](#)
To: [Trails@Parks](#); [Christine Stroiney](#)
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Friday, October 21, 2022 2:50:40 PM

n't often get email from stroineyd@sbcglobal.net. [Learn why this is important](#)

Ladies and Gentlemen,

We have recently become aware of the Road and Trail Management Plan Draft dated September 21, 2022. We use the trails identified as the Snowberry Creek Trail and Pioneer Express Trail nearly every day. These are currently designated as horse and hiking trails. Nowhere along these trails, from Negro Bar State Park to Shadow Glen stables, is there any notice of official changes proposed to the use of these trails. If we hadn't recently walked out along the Shady Trail we would have had no way of knowing that California State Parks intended some alarming changes to the above mentioned trail designations.

These trails are very narrow and steep in sections, and have been designated as horse and hiking only for the very good reason that mixing bicycles in with foot and hoof traffic is extremely dangerous. We have encountered multiple bike riders traveling at high speed on these trails without regard for the safety of other users. Many times they are not even in control of their own bikes. California State Parks has been negligent in not enforcing its own rules on these trails and making it legal for such use is inviting perilous encounters between foot traffic, for which these trails were designed, and bikes.

We recognize that mountain bike use has grown rapidly and that areas for their use need to be addressed, but allowing them to be integrated into low speed trails is not the answer. Just as the Prairie City SVRA was created to protect sensitive areas while still providing off-road terrain for ATV use, designated bike trails need to be separated from foot and horse trails that cannot safely accommodate high speed traffic.

Please reconsider changes to trail designations in these areas and return to enforcing the sensible rules already in place.

[Dennis Stroiney](#)
stroineyd@sbcglobal.net
916-501-5585

I09-01

From: [Don Rose](#)
To: Trails@Parks
Subject: Folsom Lake State Parks Road and Trail Management Plan (RTMP)
Date: Sunday, October 30, 2022 10:23:15 PM

Via Email
October 30, 2022

California Department of Parks and Recreation
Planning Division
Roads and Trails Program
trails@parks.ca.gov

Re: Folsom Lake State Parks Road and Trail Management Plan (RTMP)

Dear Planning Division:

This letter is to provide comments on the most recent draft RTMP for Folsom Lake State Recreation Area and Folsom Powerhouse State Historic Park.

I appreciate that the most recent draft of the RTMP is responsive to many of the suggestions made in regard to previous drafts and I appreciate all the work so far by State Park staff.

However, I believe the most recent draft of the RTMP contains one glaring shortcoming.

NFAR #8 proposes a pilot program for alternate day bike and equestrian use from Rattlesnake Bar to Oregon Bar. This alternating day program is made completely dependent on development of a low water route between Rattlesnake Bar and Horseshoe Bar. This is obviously not a feasible solution because of extreme bank gradient and rockiness in some sections. I suggest a more reasonable and feasible solution of utilizing alternating low water and above high water line alignments depending on where the terrain is most conducive to a multi use trail. This should include portions of the existing Pioneer Express Trail where the terrain is relatively flat with good sightlines. That would facilitate avoidance of the most difficult terrain below the high water line. Connections would have to be constructed between the low water trail and the existing trail where the alignment would alternate between the two.

I10-01

Sincerely

Don Rose
(916) 204-2836
donofthedirt@yahoo.com

COMMENT LETTER # I11

From: [Dorothy Foster](#)
To: [Trails@Parks](#)
Subject: Folsom State Park Trails
Date: Saturday, October 29, 2022 7:11:17 AM

n't often get email from dorothyfoster39@yahoo.com. [Learn why this is important](#)

I have ridden my horse from Folsom to Auburn many times and sometimes had to hold my breath when close to a drop-off. I cannot imagine riding those trails when there is a chance of a speeding cyclist coming at me. My horse is not afraid of bikes when she can see them coming, but bikes are silent and when coming at her at speed, I am sure that her "fight or flight" instinct would overpower her training. The startle reflex that creatures all have could cause her and my death!

Sincerely,
Dorothy Foster
(15 time finisher of American River Classic Endurance Ride)

I11-01

Rourke Healey

From: Garrett McDermid <garrett@fatrac.org>
Sent: Friday, September 23, 2022 12:43 PM
To: Taylor, Erik@Parks; Micheaels, Jim@Parks; Trails@Parks; Matt Wetter
Subject: RTMP update and Rollingwood Canyon access trail

Hi Jim, Erik, Trails Planning Staff,
FATRAC is excited to start reviewing the next draft of the RTMP that was just released and get back to you with more feedback. I had a quick question for you though, will there be some reason provided to us on why Middleridge was not considered for a change in use designation other than the one that was given in the public comment meeting - that horses are allowed on middleridge and not bikes because they've been around longer?

I12-01

As FATRAC represents the second largest user group of trails in FLSRA, I hope our feedback will be given more credence and we will be included more in the rest of the RTMP process.

On another note, I am working with Sac County Supervisors and Parks Staff, and the Director of the Rollingwood YMCA to create a bike park and bike trails in the Rollingwood Canyon Area that is an access point to Folsom Lake SRA. I understand there might be State Park grants available for opportunities like this and wanted to see if anyone could provide advice for submitting for that grant.

I12-02

Thanks!
-Garett

Garrett McDermid
FATRAC Board Member
Bike Park Advocate
Veteran Navy SEAL
916-936-2453

Rourke Healey

From: Henriette Bruun <hbruun0@gmail.com>
Sent: Tuesday, October 18, 2022 5:35 PM
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SPH RTMPS

n't often get email from hbruun0@gmail.com. Learn why this is important

Thank you for opening up for public comment on Folsom SRA and Folsom Powerhouse SPH RTMS

I am an avid horse rider, hiker and occasionally also a regular mountain biker (not on ebike) and live in Yolo Co. My husband and I often travel to Folsom's beautiful state park to enjoy the peace, nature, lake and the wonderful trails. It is such a breathing hole in an otherwise busy region.

I very often horse ride, specifically the Pioneer Express trail between Granite Bay to Beeks Bight. And we all seem to get along with hikers, with young children/grandchildren, dogs, seniors and trail runners. All these are slow moving and people can easily step aside for horses and horses have time to recognize the human and their sounds.

Bikes and now, especially mountain e-bikes, move much faster and are often silent. Horses often mistake fast moving silent bikes/e-bikes for a predator and could easily spook! The trail is at places narrow and encountering a fast moving e-bike could be detrimental to the safety of both biker and horse rider!

I13-01

Therefore I do not support allowing bikes/including all classifications of e-bikes, on the sections of the Pioneer Express trail as detailed in:

- ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing
BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment
BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road
BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1

There are fewer and fewer safe trails that we are able to ride on, hike with our families and run where we can enjoy the outdoors without worrying about dangerous encounters with high speed bikes.

When bikes are allowed on trails with other slower users, multi-use quickly becomes the exclusive use of the bikes! Trail usage in the Doton and Browns Ravine area, the Darrington Trail, and the Granite Bay Center Trail has changed.

Traditional trail users, including me, have abandoned the trail due to safety and quality of life issues, or use those trails only during weekdays when fewer bikes are using the trail.

But that's how it is now and will only get worse if bikes are also allowed on Pioneer Express Trail. Our last bastion!

I13-02

There are already issues with bikes riding illegally, or not following regulations and yielding to equestrians and hikers. There is no enforcement of current regulations. It is utopia to think that ebikes or other electric type fast moving objects (like the "one wheel e-board") will go away! They are here to stay. So we need to find a solution on how to all be able to use our trails safely.

The only solution is to separate trails for user groups.

(as Folsom Lake SRA already has done with Pioneer Express Trail and please leave it as such:)

And if bikes want technical trails, where speed is possible without endangering other trail users, separate trails should be built. Bikes clubs in other areas have been successful with this.

I13-03

Even though Parks states one of their purposes is to "reduce potential safety issues," the only mention of "trail safety" action is to "initiate education programs for trail users on proper trail etiquette and trail safety." Education has been the only thing Parks has done about trail safety in the past 30 years. It isn't working. There is nothing in the Plan to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail-

safety reporting programs and a searchable database, or a system in which the public or Parks can return a trail to hiker-horse only after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, large boulders, to ensure bikes don't travel at a high rate of speed.

**I13-03
cont.**

The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only.

I13-04

The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.

I13-05

If trail specific Rangers were out on the trails during high usage times, and gave citations, the park system could start counting on a new financial income source and....make it safer for us all and instill good habits for us all to live in harmony together.

I13-06

I further support:

BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route § Officially signed as hiker/equestrian

Adding facilities to Equestrian Staging Areas

§ BPGB#5 Granite Bay Horse Assembly area

§ NFAR#2.Rattlesnake Bar Equestrian Staging Area

I13-07

Thank you for your time and consideration.

Sincerely

H. Bruun

Rourke Healey

From: Heidi Alechko <heidi.alechko@yahoo.com>
Sent: Sunday, October 30, 2022 11:46 AM
To: Trails@Parks
Subject: Trail Management Plan

n't often get email from heidi.alechko@yahoo.com. [Learn why this is important](#)

Good Afternoon,

As a fellow trail user at Folsom Lake as well as a member of the Folsom Lake Trail Patrol, I do not think the safety factors of this plan have been carefully thought through. Over the past 15 years I have been approached and have witnessed numerous incidents where Equestrians as well as hikers and runners have been verbally abused and bullied by bike riders. The bike riders are not careful and do not keep in mind that there are non-bike riders that use these trails. People have been run over by the bike riders on trails that are designated as foot traffic only. Equestrians have been severely injured due to the bike riders who travel too fast on non-multipurpose trails. Now we have the motorized vehicles being alloud on the trails.

As a tax payer and a frequent user of these trails I do not want to see allocated park funds used for law suits due to someone being seriously injured or killed on our trails just to appease a group of people. Rangers tell me they don't see many bikes on the trails but they say they're out on the trails later in the day. Maybe, if we had Rangers on horseback or bikes more bikeriders would be caught and find.

I14-01

A person who cares about safety,
Heidi Alechko
916-410-8548

[Sent from Yahoo Mail on Android](#)

Rourke Healey

From: Jan Willis <bjwillis@sbcglobal.net>
Sent: Thursday, October 20, 2022 7:17 AM
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP"

n't often get email from bjwillis@sbcglobal.net. [Learn why this is important](#)

Please do not open to bikes our pioneer trail in the areas that are currently restricted. Narrow single track and especially with a cliff or drop off have no place as a multi-use trail. Allowing bikes on this type of trail will cause harm and even death to the equestrian user, that can currently use these trails. The speed that bikes typically engage in, and the fact that cyclist usually look down instead of far ahead, make for unacceptable and sometimes tragic encounters with other trail users. Narrow trails may not allow the passing of cyclists and equestrians, creating yet another dangerous situation. Please keep our trails safe and do not allow pressure from the large bicycle lobbying groups to influence your decision. Keep our trails safe.
Jan Willis

I15-01

Rourke Healey

From: Janis Rau <eclipse4784@gmail.com>
Sent: Saturday, October 29, 2022 12:30 PM
To: Trails@Parks
Subject: Folsom Lake SRA, Folsom Powerhouse SHP_RTMP

Don't often get email from eclipse4784@gmail.com. [Learn why this is important](#)

October 29, 2022

Folsom Lake SRA

Folsom Powerhouse SHP-RTMP

My husband and I are long time and frequent users of the Folsom Lake SRA. I agree there is need for change and repair in our parks. My concern is the consideration of the proposed plans for the Pioneer Trail.

The Pioneer Trail from Granite Bay to Auburn is made up of mostly singletrack trail. There is a multitude of blind corners, many of them on narrow steep ridges. The bigger part of the Pioneer Trail is not compatible with hikers and equestrians meeting with bicycles. It is extremely unsafe. This part of the trail through the park is the only trail that is not multi-use and not available to bicycles. Essentially the only trail equestrians and hikers can travel and not be worried about confronting fast moving bi, cyclist. To compound the lack of safety on the Pioneer Trail, adding any kind of motorized bicycles, air board, scooters, compromises the safety of the even further. There are miles of trails in and around the Folsom Lake SRA that bicycles and motorized vehicles can ride without taking away the security of the Pioneer Trail.

I16-01

Please keep the Historic Pioneer Trail as pedestrian and equine. only.

Janis and Peter Rau

Rourke Healey

From: Jazzyy Catt <jazzyycatt@gmail.com>
Sent: Tuesday, October 18, 2022 12:32 PM
To: Trails@Parks

I would like to see a paved bike trail along with dirt horse trails that go completely around Folsom lake a long with more campgrounds.
Wouldn't that be awesome to be able to hike, bike or ride a horse around the lake and camp at different camp grounds around the lake!

I17-01

Rourke Healey

From: Jenni Moser <barngal@earthlink.net>
Sent: Saturday, October 29, 2022 5:11 PM
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP

My name is Jenni Moser, I am a long time equestrian trail user in Sacramento. I am opposed to allowing E-bikes on horse and pedestrian hiking trails.

State Parks has totally ignored the safety issues and the dangerous conditions which are created when speeding bikes are added to existing trails with slow moving hikers, joggers, seniors, families with young children, equestrians, dog walkers, runners, nature lovers, etc.

Instead of converting existing pedestrian trails into dangerous "multi-use trails", Ace 4 Safe Trails urges State Park officials to create a trail system with separate trails designated as "**High Speed trails**" for fast moving trail users (mountain & e-bikes), and "**Low Speed trails**" for all other slow moving trail users (using existing trails).

Please consider SAFETY and ENJOYMENT of all trail users as you make this decision, and rule AGAINST ebikes on the equestrian trails!

I18-01

Sincerely,

Jenni Moser

Sacramento Valley Equestrian Patrol

[Jenni Moser](#)

barngal@earthlink.net

Lori Christensen
9459 Alcosta Way
Sacramento, CA 95827

October 29, 2022

Subject: Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park Road & Trail Management Plan (RTMP), Public Review Draft 9-21-22, Appendices, and Initial Study/Negative Declaration

To: State Park Managers

Thank you for the opportunity to comment on the important Road and Trail Management Plan (RTMP) and associated documents.

I am writing to you to comment on the Draft Folsom Lake State Recreation Area RTMP and Initial Study/Negative Declaration. I have 15 years of experience of riding my horse on the trails around the Folsom Lake Recreation Area including Browns Ravine, Folsom Point, Beals, Granite Bay, and Rattlesnake Bar and Olmsted Loop.

This Public review Draft Plan heavily favors bike riders at the expense of other trail users—equestrian and hikers. There are many places in the document where State Parks is proposing to change the trail designation from equestrian and hikers to add bikers as an acceptable use. State Parks based a lot of their decisions on the outreach survey effort done in October 2021-2022 by Alta Planning and Design. According to the key findings the survey respondents were overwhelming white, male, middle aged, and live in households with high annual incomes. In addition, they were largely mountain bikers. This skewed the outcome of the survey. While this is definitely a portion of your user group at Folsom Lake, the pool of respondents should have been more diverse. It seems only fair that more outreach should be done to pedestrians, hikers and equestrians to get their opinions of what they want to see at Folsom Lake.

I would like to point out specific comments and corrections to the Folsom Lake State Recreation Area RTMP:

1. On Page 28, Salmon Falls Ranch and Acorn Creek Trailhead. Please add equestrian to the following sentence in the document. “The American River Conservancy (ARC) is a non-profit community organization that manages land adjacent to FLSRA along the South Fork of the American River, including

I19-01

I19-02

Salmon Falls Ranch and Acorn Creek Trailhead. The network of ARC equestrian/hike/bike trails...”

I19-02
cont.

2. On page 29, Bureau of Land Management. Please add horseback riding to the following sentence in the document. “The South Fork American River Trail extends from FLSRA to the Bureau of Land Management’s Cronan Ranch Regional Trails Park. Whitewater rafting, kayaking, hiking, horseback riding, and biking are popular recreational activities on these public lands.”

I19-03

3. On Page 29, Sterling Point Equestrian Staging Area and Connector Trail. Please note that the word Multiuse trails is incorrect to describe the trail at Sterling Point. This is a hiker/equestrian trail. Mountain bikes or motor vehicles are not allowed at Sterling Point trails due to safety concerns.

I19-04

4. Page 44, Under Coordination and Collaboration. Regarding expanding bike bell program to warn trail users of oncoming bicycles. While this may help equestrians and pedestrians hear oncoming bikes, it doesn’t do anything to slow bikes down which is the real danger. Additional patrols and ticketing speeders would be more effective.

I19-05

5. Page 45, regarding funding for adequate staffing. During my many rides around the Lake, I rarely see a Park Ranger patrolling trails. Once more trails are open to bikers and more people use the trails, State Parks is going to need to add rangers to trails they have not frequented. I support additional funding for park rangers.

I19-06

6. Page 45, Develop a bicycle skills area or technical riding area to be managed by a concession contract. Throughout the RTMP, it talks about equity of users. This should be a multi-use area/facility that equestrians and hikers can use. Or a separate area/facility should be built for them.

I19-07

7. Page 55, LLN #11, Willow Creek. This is a multi-use area with a bike trail and granite path alongside for hikers and equestrians. Additional parking should include spaces for horse trailers.

I19-08

8. Page 77, BPGGB #1. I support separation of trails in the Dike 1 area.

I19-09

9. Page 80, BPGGB #8. Class 1 Paved Trail from Beals Point to Granite Bay. State Parks is recommending developing a plan to extend the paved trail from Beals Point to Granite Bay. I oppose a paved trail from Beals to Granite Bay because it would cause destruction of wildlife habitat; it would be expensive and would create pollution that would run off into the Lake. Why add another paved trail? Bikes already ride the trails without pavement and equestrians and hikers don’t need it.

I19-10

10. On Page 82, LLN #12, regarding CIU on the Pioneer Express Trail. Currently the acceptable use on the Pioneer Express Trail is hikers and equestrians. This trail change would allow bikes on the trail from the San Juan Water Plant to Beals Point. I have noticed many blind turns and spots where you cannot see very far ahead due to rocks, trees or other barriers. This is an important point, because this is potentially where the bike/equestrians collisions happen. I can tell you from experience that running into a biker around a blind corner is dangerous situation for the horse, rider and sometimes the bike rider. Horses can spook when startled by a fast moving biker(s). Please reconsider this CIU in this area.

I19-11

11. Page 89, NFAR #1, Horse Shoe Bar Road Trailhead Access. The Plan calls for developing a small trailhead parking and trail access facility. When developing this access, please consider including horse trailer parking so equestrians can access this area.

I19-12

12. Page 90 & 92, NFAR #5 Future Bridge Over the North Fork of the American River and proposed new trail would connect to Darrington trail. I support new trails as long as equestrians are included in trail use. I don't support another trail for just mountain bike riders.

I19-13

13. Page 92, NFAR #8 Pioneer Express trail from Rattlesnake Bar to Oregon Bar. Portions of this trail are very narrow with little to no place to get off for on-coming traffic. I agree with State Parks that enforcement of alternating day use in this area would be a challenge. If the State Parks implements a pilot project for alternating trail use days they need a centralized website or phone number to take complaints when problems or conflicts arise. Statistics need to be kept about the number of conflicts. During the last public meeting there was some discussion of how many equestrian/bike accidents/issues actually occur. This system could help keep statistics for future planning efforts.

I19-14

14. Page 109, SFAR #1 Trailhead Hike/Bike Campsites in the Peninsula Area. Equestrians would love to have campsites in the Peninsula Area. After the North Fork trail is developed, this would allow equestrians to ride the many trails in the area. If a staging area is developed, please consider making it large enough for horse trailers.

I19-15

15. On Page 114, SFAR #12, regarding the Monte Vista trail network, which would be a no-bike trail loop for hikers and equestrians. 5 miles doesn't take long to ride on a horse. Please consider a larger area for a no-bike loop trail.

I19-16

RTMP Initial Study/Negative Declaration

Page 15, Projects requiring additional CEQA. There is no mention of a subsequent CEQA document for a bridge in the list of projects. A bridge would have substantial

I19-17

environmental impacts to the land and river. A new bridge and the trail on the adjacent side of the North Fork of the American River should be included in this list.

I encourage State Parks to preserve trails that are separate, meaning bikes have their own trails and accordingly so do equestrians and hikers. I appreciate that State Parks is expanding the use of the Snipes Pershing Ravine Trail to allow equestrians. I also support the improvements mentioned in the Plan to Equestrian Staging areas.

In closing, the Folsom Lake State Recreation Area has many multi-use trails (intended for bikers) in its jurisdiction and there are very few trails designated for equestrians and hikers only. Please save trails for hikers and equestrians, so we can have trails that are safe without worrying about colliding with a bike. Please do not put us at risk of injury to our horses and ourselves by opening up more trails to bikers.

Please let me know that you received my comments. Feel free to contact me if you would like to discuss these issues and ideas further. Thank you for your attention to this matter.

Sincerely,

Lori Christensen

**I19-17
cont.**

Rourke Healey

From: Jim Gordon <james_c_gordon@yahoo.com>
Sent: Wednesday, October 26, 2022 10:30 AM
To: Trails@Parks; Communications, Info@Parks; James C Gordon
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP

't often get email from james_c_gordon@yahoo.com. [Learn why this is important](#)

Hi,

After reviewing the trail management plan I am struck by how so much thought has gone into so many things - yet one obvious health / safety issue continues to be ignored.

That is, annually (it seems I don't know for sure) some part of the management of the running / biking dirt trail that surrounds Folsom Lake is "trimmed" back - bushes and tree branches along the trails cut off of living plants / trees and simply left on the ground to become dry fire hazards.

The trimming is fine, probably necessary. But, the net effect is living plants / trees are turned into fire tinder. And just left there forever. It is such a mind numbing practice that makes almost all other fire abatement practices of individual homeowners absolutely useless.

In other words, why should / why do homeowners have to go through all the work of maintaining space, keeping bushes / grasses trimmed....if the agencies responsible for the lake do the exact opposite, creating a fire hazard that is way, way more dangerous. Doing so means that all the work homeowners do is meaningless...there is no way to beat a fire that starts in the hazard that the agencies involved create.

I complain about this repeatedly (starting August 2020...multiple mails / calls made since). Nothing gets done. Then I see the signs you've posted around regarding the Folsom Lake SRA plan and I can't help but wonder what logic is behind this. More plans like the one out for comment come into being while the biggest issue stays ignored. This is a disaster waiting to happen and no one seems to care.

The area of the trail that borders my home (see address below) is one of many examples...huge piles of dead branches cut and left behind, never cleaned up, never collected...just waiting to be a monumental disaster.

It would be better not to cut the branches / bushes if the tradeoff is between trail usability and the creation of a monumental fire hazard, threatening the homes of this whole area.

Jim Gordon
2139 Huntington Cir.

El Dorado Hills, CA 95762

I20-01

Rourke Healey

From: Joby Souza <manager@americanriverclassic.com>
Sent: Sunday, October 30, 2022 7:58 PM
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP

- Nevada County
- We also enjoy the trails around Folsom
 - The peace and quiet enhance my nature experience
 - She enjoys riding on this historical trail
- This is from my wife and I in which she rides these trails often and we also manage the American River Classic Endurance Ride (equestrian) which starts at Black Minors Ravine and continues up to Auburn and up to Cool and back. We have concerns that this historic ride (going on 50 years (Oldest Sanctioned A.E.R.C. Endurance Ride in the World), originally starting at Cal Expo) may have to no longer exist do to lack of respect of the trails do to over illegal usage on original equestrian trails. These trails would not be here if it were not for equestrians.
 - I do not support allowing bikes on the sections of the Pioneer Express trail as detailed in:
 - ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing
 - BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment
 - BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road
 - BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1
 - She feels currently un safe using the trails because bikes are using equestrian trails only and don't announce or yield appropriately to equestrians
 - There are fewer and fewer safe trails that we are able to ride on, hike with our families and run where we can enjoy the outdoors without worrying about dangerous encounters with high speed bikes.
 - On other trails, where there are high speed bikes, She don't feel safe
 - Riding
 - On multiple occasions, I've had dangerous encounters with high speed bikes that aren't paying attention to other trail users, or yielding to hikers and equestrians.
 - She tends to avoid those trails because it's too dangerous for me and my horse

I21-01

I21-02

I21-03

• It is highly probably that current users of the Pioneer Express will be disenfranchised if additional sections are opened to bicycles, especially where the trails are narrow, single track trails. When bikes are allowed on trails with other slower users, multi-use quickly becomes the exclusive use of the bikes. Trail usage in the Doton and Browns Ravine area, the Darrington Trail, the Granite Bay Center Trail has changed. Traditional trail users have abandoned the trail due to safety and quality of life issues, or use those trails only during weekdays when fewer bikes using the trail.

I21-04

• There are already issues with bikes riding illegally, or not following regulations and yielding to equestrians and hikers. There is no enforcement of current regulations.

• Even though Parks states one of their purposes is to “reduce potential safety issues,” the only mention of “trail safety” action is to “initiate education programs for trail users on proper trail etiquette and trail safety.” Education has been the only thing Parks has

I21-05

done about trail safety in the past 30 years. It isn’t working. There is nothing in the Plan to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail safety reporting programs and a searchable database, or a system in which the public or Parks can return a trail to hiker-horse only after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, to ensure bikes don’t travel at a high rate of speed.

• The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only.

I21-06

• The bikes have plenty of trails to use, with miles of paved trails from Granite Bay,

through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.

I21-06
cont.

• If bikes want technical trails, where speed is possible without endangering other trail users, separate trails should be built.

I21-07

- I support
 - BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route
 - § Officially signed as hiker/equestrian
 - Adding facilities to Equestrian Staging Areas
 - § BPG#5 Granite Bay Horse Assembly area
 - § NFAR #2. Rattlesnake Bar Equestrian Staging Area

I21-08

--
Souza's Farrier Service
530-274-7885
KW6DEF
73

Rourke Healey

From: Karen Sullivan <greymare56@gmail.com>
Sent: Monday, October 17, 2022 6:44 PM
To: Trails@Parks
Subject: RTMP Folsom Lake SRA and Folsom Powerhouse SHP RTM

[You don't often get email from greymare56@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To State Park Officials,

Regarding any plans to convert any trails to multi use (allowing mountain bikes and E bikes),, there in only one sensible response, and that is a resounding NO!! Adding speeding bikes to trails used by foot people (hikers, pedestrians, seniors and equestrians) has been proven over the past 30 years to be an unsafe and dangerous mix of incompatible users and has resulted in serious injuries and even death to other trail users directly caused by mountain bikers.

I22-01

State Parks is not doing enforcement currently on trails illegally accessed by mountain bikers, and so-called education of user groups has not solved the problem. Mountain bikes are getting faster, more destructive with big knobbed tires and with e bikes, speed has increased.

Mountain biking is an extreme sport, and racing and illegal trail poaching has been well documented on a mobile App and website called STRAVA that encourages cyclists to race as fast as they can on public trails and try to beat each other's speeds. This website also shows illegal riding on many trails closed to bikes.

Given that State Parks are for everyone to enjoy in a recreational and safe manner, paraphrasing California Department of Parks and Receptions Director Armando Quintero, "One of the primary reasons our State Parks exist is for Californians to escape from the stress of everyday life and to have a safe way to relax and enjoy nature." State Park trails play an important role in accomplishing this goal, and California State Park's Trail Policy specifically states:

I22-02

"Public safety is a part of CSP's guiding policies and a critically important priority for visitors to CSP units and users of CSP trails.
CSP's Trail Policy includes public safety as a key issue for development of trails."

Adding bikes to multi-use trails is completely contrary to the statements above.

Here are a handful of examples of what happens in YOUR area. Any place there are multi-use trails there are documented injuries to hikers and equestrians from mountain bikers. There are shrinking numbers of trails where equestrians can ride safely. Mountain bikers belong in ORV areas, where they can speed, shred and do all the damage they want, with others who want to go fast and take risks. Or they can use their corporate monies to build mountain bike parks only with the flow trails, down hill runs and jumps that they want

I22-03

-In July, 2020 8-10 bikers in Folsom Lake SRA - Beeks Bight area, came careening and jumping over rocks on a hiker-horse trail marked NO BIKES, and one of them slammed into a horse's head, who dumped its rider in fear and bolted. Bikers didn't stick around long enough to make sure they both were alright. ALL the bikers were riding illegally, recklessly, negligently. In the time of Covid, there are many more illegal riders in the parks who don't give a damn WHY these trails are limited to foot traffic (safety, drop offs, narrowness, etc.). It's time for the Rangers to start giving real tickets and confiscate the bikes.

-Bill Finkbeiner was running on a levee above the American River Parkway when he was hit by a hit and run biker on June 13, 2017 while running with friends. Bill Finkbeiner, who hasn't missed a day of running in 37 years, has skull and hand fractures and is missing teeth following the hit-and-run crash. Friends who were walking with Finkbeiner say a man riding a bike came speeding up from behind and crashed into him, sending him flying into the air.

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.motherlodetrails.org%2Fnews%2Ftrail-runner-recovering-after-hit-and-run-by-bicyclist-along-american-river-parkway&data=05%7C01%7Ctrails%40parks.ca.gov%7Cad0fbe6601bf4916c78b08dab0aa3c72%7C06fd3d24656448018226b407c4d26b68%7C0%7C0%7C638016542468065754%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sd=QysFqT9Nsau1xcAm3gPgszIXyT6k5yYNNVmDypEoIT9U%3D&reserved=0>

- Calif. firefighter critical after being hit by bicyclist Eric Williams was running on a multi-use trail when he was struck; he suffered major head trauma (Jan 9, 2015)

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.firerescue1.com%2Fbicycle%2Farticles%2F2078058-Calif-firefighter-critical-after-being-hit-by-bicyclist%2F&data=05%7C01%7Ctrails%40parks.ca.gov%7Cad0fbe6601bf4916c78b08dab0aa3c72%7C06fd3d24656448018226b407c4d26b68%7C0%7C0%7C638016542468065754%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sd=FEEnMA4%2FPbEWBUR%2FgPPJZhUe5aZ956dSwa4dnp%2Bj12Mk%3D&reserved=0>

-Jan 2014 Folsom Lake Trails, Ex-president Mother Lode Back Country Horsemen Gerry Bourn is bucked off when her horse is spooked by mountain biker behind horse. -----She has several breaks in her hip and multiple broken ribs.

- 2013 Rangers have determined the illegal speed of the mt. bikers on the American River trails has be responsible for near and actual collisions causing injury to other trail users.

-Sheila Larson nearly avoided collision with speeding mountain bikers Auburn State Rec. Area, California, Jan 2011
"Several cyclists came flying around the corner. Fortunately I was on a real steady horse but the horse and I could have gone down the hill and onto the highway."

-Sharon Turner Cool California, 2007 Speeding Biker on Olmstead trail slams into horse, rider has torn rotator cuff. I was riding my horse with a friend and 2 bike riders stopped off the trail and we stopped to chat with them. A woman on a bike came full force head down and took my horse head on..he spun and I went off he is 16 hand qtr horse..she stopped about 20 yards up and the bike riders were yelling at her for such stupidity . Horses have right of way on trails. I was hurt rotator cuff tear and abrasions cuts

-Folsom park watch: Incident reports, illegal trail riding and building (I have this as paper copy, extensive information)
Over 67 incidents from 2010 to 2014 involving illegal activities from mountain bikes, some resulting in serious injuries to park users.

Please do the responsible thing, which is to ignore the unrelenting pressure from Mountain Bikers who intend to bully their way into access on every public trail and put safety first.

I have a report detailing 30 years of injuries and deaths to hikers and equestrians directly caused by cyclists and mountain bikers that I am more than happy to share.

Karen Sullivan
7480 Kelsey Creek Drive
Kelseyville, CA 95451

I22-03
cont.

I22-04

COMMENT LETTER # I23

From: [Kathy Roberts](#)
To: Trails@Parks
Subject: Folsom Lake Trails
Date: Friday, September 23, 2022 4:17:58 PM

I am an equestrian who uses the trails at least twice a week and has since we moved here in 1986. I have no problem making all trails multi-use if the following is done:

- 1. put "speed bumps" on trails that are unsafe for speed, either horseback or on bicycles. Can be railroad ties across trails or something similar. A lot of the gouging of the trails is due to speed, and slower speeds could make the trails easier to maintain.
- 2. require bells on bicycles.
- 3. post rules of etiquette - stickers do't work, offenders rip them off.
- 4. possible signs to alert users of blind spots, hazards, etc.

I believe we can share the trails, but we have to be safe. No one wants to get run off the trail, or kicked, or cussed at. Better trail maintenance would also make them more safe. i know of several places that limbs have been cut by hikers or bikers and left poking out in the trail at eye height for equestrians. I would also like vegetation control with goats to be considered. Folsom Lake is a fire trap waiting to happen. A while ago a horseshoe sparked a rock and a small fire resulted. Goats would not only clean up the fire danger, but would help with rattlesnake issues.

I would like the Lake to be an area that all people can enjoy, and because one group seems to have more members than another is no reason to limit anyone's use.

Kathy Roberts
916-539-4179
catch2@surewest.net

I23-01

I23-02

From: [laura lester](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Friday, October 28, 2022 8:45:11 AM

often get email from laurasl@yahoo.com. [Learn why this is important](#)

Hello

I would like to submit my opinion and desires for the development of the **Road and Trail Management Plan** that may allow fast moving bikes to existing trails at Folsom Lake State Recreation Area.

As an older (64yr) equestrian, my trail riding goal is to enjoy the beauty of the state and local parks, commune with nature, visit with friends, and enjoy some exercise in the sunshine. However, this is all destroyed very quickly when a bike comes speeding down the trail toward us and comes to a screeching halt. Horses are herd animals and react to speeding animals or strange objects with a flight reaction, thus a possibility for a spin and bolt. That is a very dangerous situation for people on horseback. At my age I am not able to react as quickly as may needed to adapt to a more uncertain trail environment resulting from bikes on the trails.

I fully support dedicated trails for pedestrians, families, and slower moving horses; and trails dedicated to faster moving bikes and others interested in a more thrilling ride.

Thank you for your time,

Laura Lester
Colfax, CA

I24-01

From: [Kris Van Roo](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP"
Date: Saturday, October 29, 2022 5:00:46 PM

[You don't often get email from kriskvr@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello:

As an equestrian and a biker that has been riding in the State Parks for approximately 25 years I have many safety concerns. State parks are possibly creating one of the most dangerous changes to our beautiful Folsom Lake Trails to date.

1. I am aware that there are many special interest biking groups that are lobbying for more trails and that there are many park employees that bike. That being said, safety should be our state parks primary concern. I bike 3 to 4 times a week- I am a SAFE biker and knowledgeable about horses and dogs and hikers. Most folks are not knowledgeable about all three user groups. Those are my credentials. There are a vast number of biking trails that equestrians and hikers share and now you want to add bike use to the historic Pioneer Trail? Please don't! I am a safe bicyclist because I am part of all three user groups - many amateur bicyclists are not. They are not well educated on other users and frequently ride recklessly. There will be more accidents and I will hold State Parks responsible for them!

2. Ok ——— now let's add e-bikes to the equation. As motorized vehicles, they are faster and frequently used by those that cannot ride a regular bike well. The ebikes are even quieter than a regular bike and will startle pedestrians and equestrians which will cause higher impact accidents.

Again, I will hold State Parks responsible for creating an environment for dangerous collisions

3. I must conclude with expressing my concerns that my tax dollars will be used to fund the multitude of lawsuits you are setting State Parks up for!

Kris Van Roo
530-320-3553
Sent from my iPhone

I25-01
I25-02

From: [Dave and Laurene Davis](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Saturday, October 29, 2022 2:53:44 PM

You don't often get email from vtown1084@gmail.com. [Learn why this is important](#)

- California Department of Parks and Recreation,
Recreation Planning Section
Attn: FLSRA and FPSHP RTMP
P.O. Box 942896
Sacramento, CA 94296-0001
- trails@parks.ca.gov

Re: Folsom Lake SRA and Folsom Powerhouse SHP RTMP

I am a life long Placer County resident and my family uses the trails at Folsom Lake Recreation area on horseback and on foot. According to the California State Parks website, the Pioneer Express Trail is a registered historical trail built by the pioneers and miners and used from 1849 – 1854. According to the site, “Historical Landmarks are buildings, sites, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value.”

I26-01

The trail has been designated as ‘Foot and Hoof’ for decades. We want to preserve this trail for foot and equestrian use only. It would be a shame to lose this historically significant trail.

Beyond the historical significance, Safety is our utmost concern. The trail has many single track sections with steep drop offs and blind curves. There is no safe way for bicycles and horses to pass one another when meeting on the trail. The speed that bikes travel plus the limited sight lines makes for a terrible combination and accidents will happen. Horses will react quickly to the speeding bikes and tragedies are inevitable. To fully understand the safety issues involved, it is imperative that anyone voting on these measures visit the trail in person and personally experience the narrow, winding trails and drop offs.

I26-02

There are many trails in the area that currently allow bicycles and are multi use. For example, multi use trails exist from Folsom Lake to Old Sacramento and in the entire park of Hidden Falls Regional Park (Auburn). I would support the construction of additional trails that would be limited to bicycle use only.

I26-03

I do not support allowing bikes on the sections of the Pioneer Express Trail as detailed in:

- ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing
- BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment
- BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1

I26-04

I do support the following:

- BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route
 - Officially signed as hiker/equestrian
- Adding facilities to Equestrian Staging Areas
 - BPGB#5 Granite Bay Horse Assembly area
 - NFAR #2. Rattlesnake Bar Equestrian Staging Area

**I26-04
cont.**

Thank you for your consideration.

Laurene Davis
Newcastle,CA
Vtown1084@gmail.com

From: [Linda Klinger](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Wednesday, October 19, 2022 8:06:51 PM

t often get email from linda.a.klinger@gmail.com. [Learn why this is important](#)

Hello,

I'm writing to express concern that the Pioneer Express Trail may be opened up to bikes. I am a horse person and also a mountain bike rider. Therefore I am not opposed to bikes on some trails; however, I am concerned about bikes on narrow trails and/or places where there is little room for error. I do feel that bikes seem to be taking over the trails and it is not as enjoyable as a hiker or horse rider. In fact, it can be pretty scary on the trails when bikes come flying by and the bike rider hasn't even noticed you until the last minute because they have their headphones on. It would be greatly appreciated if the this trail was not opened to bikes.

I27-01

Kind Regards,
Linda Klinger

From: [Brown Lisa](#)
To: [Trails@Parks](#)
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Wednesday, October 19, 2022 11:14:10 AM

often get email from lisa_b47@yahoo.com. [Learn why this is important](#)

Thank you For accepting my feedback on trail use I am a Placer County resident and reside in Loomis. I regularly frequent the Pioneer Express Trail. I purchase an annual pass regularly and was a member of the Folsom Lake Mounted Trail Patrol. I walk and ride the trails on horseback

I do not support allowing bikes on the sections of the Pioneer Express trail as detailed in:

- o ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing
- o BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment
- o BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1

I mostle feel safe using the trails because the only traffic is slow moving though I run into more and more bikes on the trail.

There are fewer and fewer safe trails that we are able to ride on, hike with our families and run where we can enjoy the outdoors without worrying about dangerous encounters with high speed bikes.

On other trails, where there are high speed bikes, I don't feel safe riding.

On multiple occasions, I've had dangerous encounters with high speed bikes that aren't paying attention to other trail users, or yielding to hikers and equestrians. Most wear ear buds and don't pay attention to their surroundings. Others don't care about trail etiquette.

I tend to avoid those trails because it's too dangerous for me and my horse.

It is highly probably that current users of the Pioneer Express will be disenfranchised if additional sections are opened to bicycles, especially where the trails are narrow, single track trails. When bikes are allowed on trails with other slower users, multi-use quickly becomes the exclusive use of the bikes. Trail usage in the Doton and Browns Ravine area, the Darrington Trail, the Granite Bay Center

I28-01

Trail has changed. Traditional trail users have abandoned the trail due to safety and quality of life issues, or use those trails only during weekdays when fewer bikes using the trail.

**I28-01
cont.**

There are already issues with bikes riding illegally, or not following regulations and yielding to equestrians and hikers. There is no enforcement of current regulations.

Even though Parks states one of their purposes is to “reduce potential safety issues,” the only mention of “trail safety” action is to “initiate education programs for trail users on proper trail etiquette and trail safety.” Education has been the only thing Parks has done about trail safety in the past 30 years. It isn’t working. There is nothing in the Plan to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail safety reporting programs and a searchable database, or a system in which the public or Parks can return a trail to hiker-horse only after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, to ensure bikes don’t travel at a high rate of speed.

I28-02

The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only.

I28-03

The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn’t used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.

If bikes want technical trails, where speed is possible without endangering other trail users, separate trails should be built.

I28-04

- I support
 - o BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route
 - Officially signed as hiker/equestrian
 - o Adding facilities to Equestrian Staging Areas
 - BPGB#5 Granite Bay Horse Assembly area
 - NFAR #2. Rattlesnake Bar Equestrian Staging Area

Thank you for your time and consideration.

Sincerely,
Lisa Brown
Placer County Resident

From: [Lonni Reno](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Wednesday, October 19, 2022 5:31:58 PM

You don't often get email from lonni652@gmail.com. [Learn why this is important](#)

Hi
I have been riding on a horse on the Folsom Lake trails for 47 years. Most of my horses handled the occasional bike.
But now we have brazen attitudes that go real fast on bikes and appear around a corner. Joggers, kids, dogs, horses, riders, or other bikers can all get extremely hurt.
In the 70s and 80s we had a park ranger on horse back in the Granite Bay Area. He lived in the house near the entrance.
I haven't seen any patrol on the trails for 20 years.
Part of your plan says to pave the trail from Beals Pt to Granite Bay. Where will the horses go?
PLEASE keep the bikes off the horse trail.
They are dangerous.
Thank you!
Lonni Reno

I29-01
I29-02

Subject: Road & Trail Management Plan - Folsom Lake State Recreation Area
Public Review Draft dated September 21, 2022

Submitted by Lucy Badenhoop, Trail Volunteer 916-216-7040
badenhoop@comcast.net

This document does not meet CEQA requirements because:

- 1. Authors by chapter, their credentials and emails addresses are missing just before the appendixes.
- 2. Public comments must be published in full (not summarized), along with the author’s credentials.
- 3. The trail features are not accurately described (narrow tread with steep drop offs & numerous blind turns).

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I30-01
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I30-02
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I30-03
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This document does not adequately address public safety concerns:

- 1. Mountain bikers have long used the Brown’s Ravine Trail illegally and vandalized park signage that prohibits bikes on that trail.
- 2. Mountain bikers regularly build illegal jumps on other public trails in the area.
- 3. Mountain bikers usually exceed the 15 mph speed limit.
- 4. State Parks officials make no effort to cite or arrest mountain bikers for these illegal activities.
- 5. Emergency aid for accident victims of high speed collisions is not reliable.
 - a. Cell phone reception is intermittent – three additional towers are needed.
 - b. The narrow single track trail does not allow for emergency vehicle access.
 - c. There are no H-marked landing sites for helicopters

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I30-04
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I30-05
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I30-06
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This poorly written draft creates legal liability issues for the state, so taxpayers like me end up paying state lawyers to defend it – a wasted use of my tax dollars.

- 1. Specially trained CEQA judges would undoubtedly find it flawed.
- 2. This is negligence by state officials/employees when they don’t follow their own published trail guidelines and rules.
- 3. Negligence often results in large court awards for injuries.

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I30-07
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Recommendation: Provide a new draft and public review period to correct these deficiencies.

From: [Maureen Henderson](#)
To: [Trails@Parks](#)
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Saturday, October 29, 2022 3:34:30 PM

n't often get email from mmhenderson5@gmail.com. [Learn why this is important](#)

My name is Maureen Henderson. I am a resident of Newcastle in Placer County. I have reviewed the Draft Folsom Lake SRA document and have the following comments:

I31-01

I am an equestrian and ride the trails in the foothill area from Granite Bay to the Overlook in Auburn. I am a regular visitor to Hidden Falls Regional Park, the trails at Cool and Cronin Ranch. I frequent trails in other counties. I ride an average of 3 days a week, usually staying off the more popular trails on weekends.

I31-02

My biggest concern with the RTMP is safety. It is the first and foremost concern of all the equestrians whom I know. These concerns range from trail conditions to trail encounters. I have been a local horse rider in this area for 30+ years and have been fortunate enough to have never had a serious incident with other trail users, though, over the years, there have been some close calls. Riding a 1000+ horse on the trails, encountering obstacles of all sorts, is a challenge. Horse riding is inherently an already dangerous sport. We protect ourselves as best we can by utilizing safety equipment, i.e., helmets, safety vests, appropriate shoes, etc. However, none of this will matter in the event we enter a collision, or near collision, with another trail user, i.e., bikes. There are several places on the Pioneer Express Trail which are narrow with drop-offs on one side and mountain on the other. There are places where there is no opportunity to pass. These situations present a **dangerous condition**.

I31-03

I am aware that bike riders have been wanting access to Auburn on the Pioneer Express Trail for many years. They also want to be able to access Cool and are looking forward to having the proposed bridge. They have been pushing for this Change in Use for quite some time. I understand bike riders wanting a trail to Auburn, however, in my opinion, allowing them on the Pioneer Express Trail is a mistake. I don't have a problem sharing the trail. I do it every time I choose to ride on multi-use trails, which is all trails as there are no "horse only" trails. The problem is the difference in speed between fast-moving bikes and slow-moving trail users on the same trail, especially with blind corners and no space to move off the trail. This, to me, is a trail safety issue. One example of how speed affects other trail users is the following: We love that cyclists attach bells to their bikes and use them to alert us they are behind us on the trail. We like it when they do it far enough back that we can hear them but not so close that they startle our horses. We then can move off the trail, if possible, so they can pass. If you think about this, it flies in the face of the

"right-of-way" triangle that shows horses have right of way. I run into the same issue when walking - cyclists will ring their bells at you so you will move off the trail before they run you down. The reality is: Cyclists move at a much greater speed than the rest of the trail users and they expect you to move off the trail so they can pass.

I31-03
cont.

The changes set forth in the RTMP appear to increase more trail opportunities for cyclists which, in turn, will limit opportunities and enjoyment for other user groups. Opening some of these trails to cyclists will drive many individuals off the trails as illegal bike use and lack of trail designation enforcement already have. Some examples of this are the Doton and Browns Ravine area, the Darrington Trail, and the Granite Bay Center Trail. This is also true of the Forest Hill Divide Loop Trail. If you value your life and that of your horse, you don't go there. By attrition, these trails are now "bike only" trails! The additional fact that you will be opening the Pioneer Express Trail for e-bike use, only adds fuel to the fire, as e-bikes can go fast (check out online how fast they can go) and there is little to no enforcement. How are you going to control speed? How will you differentiate between Class 1 and Class 3 e-bikes? Some of these bikes can reach 35-40 mph. Running into a Class 3 e-bike traveling at a fast speed is the equivalent of running into a small motorcycle on the trail. How are slow moving users supposed to deal with that?

I31-04

The Pioneer Express Trail is an historical trail, open only to foot traffic and equestrians. I believe it should remain as such. Some people believe all trails should be open for use to all people. Due to safety concerns, this is not possible. Some user groups are just not compatible on the same trail.

I31-05

I have talked with mountain bike riders when riding at Hidden Falls. Many of them would love to have "bike only" trails so they could go fast and not have to worry about running into the slower user groups. As an equestrian, I would be thrilled to let the mountain bikes have their own trails. Opening the Pioneer Express Trail to bikes means that the trail would have to be converted to "multi-use." It is my understanding that the cost is less to develop new trails rather than convert to multi-use standards. Separate trails will allow the cyclists to go fast, better meeting their desired bike experiences. The slower recreational users would have a safer and more enjoyable trail experience.

I31-06

Last, but not least, there are many horses in Placer County. Enough to support several tack and feed shops, farriers, veterinarians, local truck and trailer sales, construction of barns, the Tevis Cup held each summer, supporting the tourist industry, etc. The horse industry in Placer County is a huge economic boost for our community. There really are not very many "horse/hiker" trails left. Almost all trails have become multi-use. Horse enthusiasts in Placer County don't ask for much, but

I31-07

they are asking that you seriously consider leaving just a few historical "horse/hiker" trails as they are so they may continue to be used as such for future generations. I do appreciate the fact that you have included proposals to upgrade the equestrian staging areas at Granite Bay and Rattlesnake Bar. Those upgrades would be very much appreciated by the equestrian community.

I31-07
cont.

Based on the above, I do not support allowing bikes on the sections of the Pioneer Express Trail as detailed in:

ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing

BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment

BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road

BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1

I31-08

I do support the following:

BPBG #10 North Fork Shoreline/Low-Water Multi Use Access Route

- Officially signed as hiker/equestrian

Adding facilities to Equestrian Staging Areas

BPGB#5 Granite Bay Horse Assembly area

NFAR #2. Rattlesnake Bar Equestrian Staging Area

In closing, I would like to emphasize that 99% of the mountain bike riders I encounter on the trail are courteous, polite and follow established trail etiquette. My horse has been desensitized to bikes, so I personally do not have a problem with sharing the trail with mountain bikes. However, that does not mean that I am willing to share a trail which is unsafe for me and my horse. There are already trails (set forth above) that I do not frequent due to unsafe conditions with mountain bikes. If the equestrian user group is going to continue to thrive in Placer County, there need to be safe trails where they can ride.

I31-09

Thank you for the opportunity to respond.

Maureen Henderson

From: [Mike Finta](#)
To: [Trails@Parks](#); [Stehl, Alexandra@Parks](#); [Quintero, Armando@Parks](#); [Smith, Barry@Parks](#); [Preston, Rich@Parks](#)
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP public comment
Date: Sunday, October 23, 2022 9:48:32 PM

Although the latest version of the RTMP offers minor tweaks to the original plan released in May, it unfortunately still relies on the **old, outdated concept of "multi-use trails"** to add access for bicyclists to park trails. State Parks has totally ignored the safety issues and the dangerous conditions which are created when speeding bikes are added to existing trails with slow moving hikers, joggers, seniors, families with young children, equestrians, dog walkers, runners, nature lovers, etc.

I32-01

Years ago bicyclists on park trails consisted of young children or sometimes parents with their kids leisurely riding on the trails enjoying nature, traveling at speeds barely faster than the pedestrians they were among. This is no longer the case today, when the majority of bikes being ridden on the trails are mountain and e-bikes traveling at speeds upwards of 20 mph.

Park user demographics have significantly changed in the last 2 or 3 decades, and **State Park trail planners need to be planning trails and trail systems for the future, not the past.** The outdated idea of creating one-size-fits-all, 36 inch wide "multi-use trails" and putting all park visitors together on a common trail is no longer valid or safe. **Intentionally adding speeding bikes to existing trails with slow moving park visitors is just plain dangerous.**

I32-02

Folsom Lake State Park officials need to recognize that today's bike riders are on totally different bikes capable of much faster speeds and that today's bike riders are looking for an entirely different experience on the trails. Park officials also need to realize that there are far more seniors on the trails today than 20 years ago. Trail planners need to design trails which better accommodate slower moving seniors and others with mobility limitations. Seniors can't jump out of the way of speeding bikes like many other non-biking trail users can. (Nor should any trail user ever have to.)

Folsom Lake State Park officials need to take a new, forward looking approach to meeting all trail user's needs, and should be looking at creative new solutions for providing today's bike riders with access to the Park. Instead of converting existing pedestrian trails into dangerous "multi-use trails", State Park trail planners should create a trail system with trails designated as "**High Speed trails**" for fast moving trail users (mountain & e-bikes), and "**Low Speed trails**" for all other slow moving trail users (using existing trails).

Such a Trail Plan

- would provide all State Park visitors a far more enjoyable and safer way to experience nature,
- would provide bicyclists with the park access they are requesting,
- would create new trails with the features and riding experiences mountain and e-bikers prefer,
- would address the "public safety" concerns of existing slow moving trail users,
- would better accommodate the expected increase in park trail use by California seniors and e-bike/mountain bike riders, and
- would follow the public safety model most cities already have in place by separating fast moving bikes from slow moving pedestrians.

I32-03

State Park officials need to recognize **there are better and far safer alternatives for providing park visitors with fair, equitable and safe trail access to park resources.** Separate trails for High speed and Low speed trail users eliminates the dangerous situations associated with "multi-

I32-04

use trails”.

State Parks needs to develop a safer Trail Plan for Folsom Lake SRA which better meets the needs of all park trail users.

Mike Finta

**I32-04
cont.**

From: [Mike Finta](#)
 To: [Preston, Rich@Parks](#)
 Cc: [Smith, Barry@Parks](#); [Quintero, Armando@Parks](#); [Stehl, Alexandra@Parks](#); [State Parks and Recreation Commission@Parks](#); [Trails@Parks](#)
 Subject: E-Bikes pose a serious danger to State Park trail users
 Date: Wednesday, October 19, 2022 5:33:27 PM

Mr. Rich Preston
 Superintendent, Folsom Lake State Recreation Area

Hello Rich,

Following up on my report to you 2 days ago about the 6 illegal e-Bike riders on the Browns Ravine Trail, I thought you should be aware of an article in "Wired" magazine which discusses e-Bikes. It points out that e-Bikes are easily modified to far exceed the manufacturer's original speed restrictions. **The speeds and rapid acceleration e-Bikes are capable of pose a serious danger to State Park trail users!** Plus an e-Bike may look like a Class 1 bike, but it may have been modified by its rider to *easily* reach speeds of 30+ MPH.

It was an e-Bike rider who recently collided with a pedestrian on a county trail in Sausalito, and **that pedestrian died as a result of being hit by the e-Biker.**

<https://patch.com/california/millvalley/marin-pedestrian-who-died-after-electric-bike-collision-idd>

Are you able to assure the public that your Park Rangers are able to visually distinguish whether an e-Bike rider on the trail is on a Class 1, 2 or 3 e-Bike? Are you able to assure the public that your staff will prevent e-Bikes from exceeding the 15 MPH State Park speed limit or endangering non-biking trail users at Folsom Lake SRA? Are you able to assure the public that your Rangers are regularly patrolling Folsom Lake SRA trails? **The high speeds of mountain bikes and e-Bikes is the overriding reason why they should be on their own separate trails.**

Here are some excerpts from the "Wired" article, and related information about how e-Bike riders can easily modify their bikes to override the bike manufacturer's speed limitations:

"The three classes are defined as follows:

- **Class 1:** eBikes that are pedal-assist only, with no throttle, and have a maximum assisted speed of 20 mph.
- **Class 2:** eBikes that also have a maximum speed of 20 mph, but are throttle-assisted.
- **Class 3:** eBikes that are pedal-assist only, with no throttle, and a maximum assisted speed of 28 mph.

All classes limit the motor's power to 1 horsepower (750W).

(info is per Bosch website) <https://www.bosch-ebike.com/us/everything-about-the-ebike/stories/three-class-ebike-system#:~:text=Class%201%3A%20eBikes%20that%20are,assisted%20speed%20of%2028%20mph.>

Note: Bosch manufactures many of the electric motors used on various e-Bikes.

Now, the reality is that the above information is basically meaningless because all e-Bikes can easily be modified to go MUCH faster than their factory imposed limits!"

(Here are just a few of many YouTube videos showing how easy it is to make e-Bikes go faster, much faster):

<https://www.youtube.com/watch?v=8feemzxKS1U>

<https://www.youtube.com/watch?v=DQic3yv8Y9w>

<https://www.youtube.com/watch?v=SneQ0sTM1Lk>

Per "WIRED" magazine, here's where it gets confusing.

I33-01

"Class 3 e-bikes can go up to 28 miles per hour and must have a speedometer, but may or may not have a throttle.

It depends on the state writing the rules. California, for example, doesn't allow Class 3 e-bikes to have throttles at all. In other states, throttles are allowed as long as they only work up to 20 miles per hour, while pedal-assisted electric power continues up to 28 miles per hour. Most states let you take a Class 3 e-bike into road lanes or a bike-only lane in the shoulder of the road (so-called curb-to-curb). But you can't take them on bike paths that exist outside of the road or on multiuse trails shared with pedestrians, like in a park.

A few e-bikes try to work around these restrictions by adding a mode that limits the speed to 20 miles per hour so that you can ride them on multiuse trails and paths. Toggle the setting or remove a special physical key and you can unlock the bike's full potential.

How About Unlocking Higher Top Speeds?

There's also an unregulated mania where ebike manufacturers are doing whatever they want. **Did you know there are e-bikes that go 60 miles per hour?** At that point, they're basically electric motorcycles with superfluous pedals attached. **A growing number of very fast ebikes are capable of blowing past 28 miles per hour and yet still have found a way to technically, legally fit into the classification system with a switchable setting and a little rider cooperation.**

It's the honor system. A lot of ebikes, like the Wing Freedom 2 and X, will let you remove the top-speed restriction in exchange for a promise that you won't ride them in bike lanes or they'll give you a notice that you should only unlock them if you're on private property. It's easy and usually done through the bike's display screen or if the bike has one, a companion app. Most only go a few miles per hour over their class' limit, but others, such as the [Vintage Electric Roadster](#) and the [HPC Black Lightning](#), **can go much faster than 28 miles per hour.** It's how some manufacturers can sell a 40 mile-per-hour ebike with a motor many times more powerful than normal and still be compliant. **You toggle a setting and suddenly it's a Class 2 or 3 ebike, at least legally.**

Like with electric motorcycles, e-mopeds don't have pedals. Most states classify these as scooters rather than motorcycles if it has a maximum speed of 30 miles per hour and, if gas-powered, a maximum engine displacement of 50 cubic centimeters. You generally don't need a motorcycle license to drive a moped if it tops out at 30 miles per hour, but you do need a regular driver's license.

The difference between an ebike and an electric motorcycle largely centers on the fact that an ebike has pedals and a motorcycle doesn't. **Even fast, nonclassified ebikes are technically considered bicycles in many US states because they have pedals.** Legislators haven't given much thought to 40 mile-per-hour ebikes, because they're uncommon. For now, they're in legal limbo in a lot of places.

State Variations and Federal Land

Effective August 2, the state of New York made it legal to ride an ebike on roads that post a speed limit of 30 miles per hour. While it doesn't directly regulate an ebike's top speed, it effectively means you're restricted to 30 mph, unless you like speeding tickets. California, aside from having a ban on throttles for Class 3 ebikes, also says an ebike's electric motor must be less than 750 watts. Washington state says it must be 750 watts or less, which effectively rules out those ultrafast ebikes. Beyond that, they're considered electric motorcycles. A few manufacturers make California-compliant versions of their higher-end ebikes.

Eight states flat-out classify ebikes as mopeds or motor vehicles and not bicycles at all. These are just a few examples of how widely the laws are written and interpreted legally, all the more reason for you to look up local state and city laws before you buy an ebike (especially a high-powered or fast one).

The [Bureau of Land Management](#), [National Park Service](#), and [National Forest Service](#) all control different swaths of federal land and have their own rules for which ebikes can be ridden where. Read

I33-01
cont.

up before you take a trip with your ebike.

Now that you know the differences, check out WIRED's guide to the **Best Electric Bikes** to find our favorites. Happy riding!"

I33-01
cont.

From: [Norma & Mike Kohlbaker](#)
To: [Trails@Parks](#)
Subject: Draft Folsom Lake SRA and Folsom Powerhouse SHP Road and Trail Management Plan
Date: Sunday, October 30, 2022 4:03:05 PM

n't often get email from 4horses@sbcglobal.net. [Learn why this is important](#)

Although your latest version of the RTMP includes minor tweaks to the original plan released in May, it unfortunately still relies on the old, outdated concept of "multi-use trails" to add access for bicyclists to park trails. You are continuing to ignore the safety issues and the dangerous conditions which are created when speeding bikes are added to existing trails with slow moving hikers, joggers, seniors, families with young children, equestrians, dog walkers, runners, nature lovers, etc. We are concerned that Folsom Lake State Park trail planners are not complying with California State Parks' Trail Policy which states: *"CSP's Trail Policy includes public safety as a key issue for development of trails"*.

I34-01

Instead of converting existing pedestrian trails into dangerous "multi-use trails", we urge State Parks officials to create a trail system with separate trails designated as **"High Speed trails"** for fast moving trail users (mountain & e-bikes), and **"Low Speed trails"** for all other slow moving trail users (using existing trails). It is far to dangerous to have these two types of trail users on the same trails.

Sincerely,

Mike and Norma Kohlbaker
Sacramento, CA

From: [Mike Lilienthal](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Wednesday, September 21, 2022 8:17:38 PM

[You don't often get email from m.lilienthal@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello,

I fully support mountain bikes being allowed on all trails in the Folsom Lake SRA.

There are rarely horses on these trails. And I believe everyone can share use of the trail system for the benefit of all taxpayers.

Thank you for including my input in the process.

Michael Lilienthal
916-597-8611

Sent from my iPhone

I35-01

From: [Spencer, Nicole](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Tuesday, October 18, 2022 2:31:44 PM
Attachments: [Outlook-r4qlojko.jpg](#)
[Outlook-kogtjvo1.png](#)

You don't often get email from nicole.spencer@cbnorcal.com. [Learn why this is important](#)

Hello.

I live and sell homes in Placer county. I enjoy the trails around Folsom and specifically the Pioneer Express trail between Granite Bay to Beeks Bight, both on my horse and as a hiker with my kids. I do not support bikes on the Pioneer express trail as it would not be safe for any party. Many parts of the trail are very narrow and have steep drop offs.

I36-01

I am happy to share the trail with bikers on other trails and do so often...however those trails provide visibility to see the other party coming and the ability to yell to get noticed or to move off the trail safely, prior to the bike coming at high speeds.

I36-02

The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.

I36-03

I support

- 1. BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route
Officially signed as hiker/equestrian
 - 1. Adding facilities to Equestrian Staging Areas
 - a. BPG#5 Granite Bay Horse Assembly area
 - b. NFAR #2. Rattlesnake Bar Equestrian Staging Area

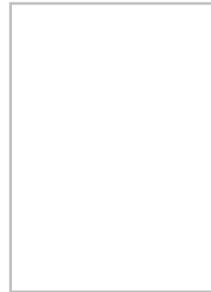
I36-04

Thank you.

Nicole Spencer
o. 530-830-9001 | m. 650-537-1245
BRE # 02008447 **Masters Club**
www.NicoleSpencerHomes.com
[Like: Facebook](#)

***Wire Fraud is Real*. Before wiring any money, call the intended recipient at a number you know is valid to confirm the instructions. Additionally, please note that the sender does not have authority to bind a party to a real estate contract via written or verbal communication.**

2022 Certified Luxury Home Marketing Specialist Designation
2022 Luxury Property Specialist Certification
2022 Institute for Luxury Home Marketing Member
2021 Top 5% of over 1 million Agents Nationwide
2020-2021 Top 3% of Coldwell Banker Worldwide (out of approx. 100,000 agents)
2017-2021 International President's Circle Team
2016-2021 Masters Club Member; Placer County Association of Realtors (top 10-15% of Realtors)
2016-2020 International President's Circle
2020 International President's Elite Award



From: [Pam Simmons](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP Draft RTMP -comments
Date: Saturday, October 29, 2022 4:17:33 PM

often get email from psimmons@calstrs.com. [Learn why this is important](#)

Thank you for posting all of these informative reports regarding this project.

I am an equestrian who has grown up around and using Folsom Lake trails all my life (Darrington/Dixon family member). While I understand the need for the park to make changes regarding trail usage to accommodate the growing user populations with bikers and I strongly suggest careful consideration regarding safety when combining bikes/pedestrians/horse. If parallel trails are possible this would be the safest option available but if that is not possible in some areas please address narrow trails with drop offs as well as blind corners. I would also like consideration for some non equestrian trails to be reviewed to see if those could also be opened up as multi-use with minor modifications.

I37-01

Thank you for the opportunity to comment.

Pam Dixon-Simmons

From: [pneifer](#)
To: [Trails@Parks](#)
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Tuesday, October 4, 2022 6:00:23 PM
Attachments: [20221004_132955_resized.heic](#)

n't often get email from pneifer@gmail.com. [Learn why this is important](#)

Please consider keeping existing hiker-only trails closed to bicycle traffic. Families cannot feel safe with bikes coming at them from around curves and down hills. Seniors enjoy the trails closed to bike traffic because they are quiet and safe. Equestrians have very few trails open to them where bicycle rider speed is not an issue in running horses off the trails.

Patty Neifer
Placer County resident of 40 years
Penryn CA
Pneifer@gmail.com
916 934-9050

I38-01

Sent from my Verizon, Samsung Galaxy smartphone

From: [Peggy Christensen](#)
To: [Trails@Parks](#)
Subject: Folsom Lake SRA, RTMP
Date: Sunday, October 30, 2022 12:52:52 PM

often get email from peggychristensen@gmail.com. [Learn why this is important](#)

Please be very careful in evaluating the CIU for the existing hiking-equestrian trails. Hiking and horseback riding are classified as a SLOW USER GROUP--- Bikes (especially e-bikes) are classified as a FAST USER GROUP. These are not compatible for usage on the same trail if there is not an adequate 1. Line of sight, and 2. Adequate trail width- at the very least 4 to 8 feet wide. If you do not follow your OWN GUIDELINES—the accidents will happen. They are already being reported and will increase and will drive off the joggers, hikers, family groups and equestrians. Your oath and mission statements project your safety and enforcement code—the standard you have set for yourself and the public (who you are RESPONSIBLE FOR) . You have chosen to ignore and actively create a volatile situation by forbidding citations to be written to bike riders that are actively riding the illegal trails. The area manager stated “ There will be NO CITATIONS written for illegal bike riders!!! WHAT? Tickets are written for outdated passes, dogs off leash, etc, Why the total guarantee of more accidents and total disregard for the park RULES? MY SAFETY IS AT RISK- No matter who is at fault —I do NOT want to end up in the hospital!!! SAFETY- do not allow bikes on non conforming trails. Jason Mann does NOT have the authority to change the designated trail width.... Solution, 1. Create a completely separate slow-fast user group trails. 2. Issue citations for not obeying the LAW. 3. Concerning the Brown’s Ravine Trail there is already a connecting route in place-Salmon Falls Rd. parallels the existing hiking trail. How would your heart feel to be responsible for a loved ones’ death or injury from an ILLEGALE trail usage that you are condoning?

I39-01

Peggy Christensen, trail user for over 40 years at Folsom Lake

Sent from [Mail](#) for Windows

October 2022

California Department of Parks and Recreation,
Recreation Planning Section
Attn: FLSRA and FPSHP RTMP

Re: The Folsom Lake SRA and Folsom Powerhouse SHP Draft RTMP

This Draft RTMP continues to ignore the **California Department of Parks and Recreation Trails Handbook** information regarding different trails users needs and the construction and designation of appropriate trails and routes ,including separate trails, for the SAFE use and HIGH QUALITY outdoor recreational experience important to the State Parks Purpose and Mission Statements.

I40-01

This Draft RTMP also ignores the information gathered by the Consultation firm Placeworks hired by FLSRA reporting chief complaints of:

-Overcrowding. “Both the Park and trail use have become increasingly popular over the last 10-20 years leading to increased numbers of users. This in turn leads to complaints around trail etiquette and competition for the same space on trails. Associated requests include new trails, parallel trails for separate user types and increased recognition of different groups.”

I40-02

-Personal Safety. “There are several instances where people report concerns of personal safety affecting how they use the trails, or how they use the parks”

I40-03

-Enforcement-“There are requests for increased enforcement of trail speeds, restricted use types and general trail etiquette.”

I40-04

Yet our FLSRA Senior Park and Recreation Specialist and this Draft RTMP plan is to force ALL trail users on to one multi-use trail except for one small portion of The Historic Western States Trail.

This “only choice” single multi-use plan will increase opportunities for cyclists-but will limit and displace opportunities and enjoyment for the slower paced and more timid of other user groups driving many off the trails as illegal bike use and lack of enforcement of trail designation in our state park already has.

I40-05

This skewed RTMP meets the the stuffed ballot box of the vocal, and paid lobby of IMBA and the Mountain Bike clubs lobbying for access to ALL trail, and rewards the poor behavior of trail poaching and illegal non system trail construction but fails and will displace many slower paced trail users besides affecting their high quality user experience. That in turn will limit the potential for the youth of some other groups to experience some recreations not compatible with fast moving mechanization.

I40-06

Our trails the same as the surface of the lake need to have separate areas for fast and slow users.

This RTMP is inadequate and the Browns Ravine Trail CIU needs to be deferred until a FAIR RTMP is in place.

Susan DeBruin



I40-07

From: ME
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Friday, October 28, 2022 10:53:02 AM

You don't often get email from sandy.ruggiero@gmail.com. [Learn why this is important](#)

I live in Placer County and enjoy the trails around Folsom. They are so peaceful and quiet and I so enjoy riding my horse on these trails. I am writing about the Pioneer Express Trail the one between Granite Bay and Beeks Bight.

I41-01

I do not support allowing bikes on the sections of the Pioneer Express trail as detailed in:

- o ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing
- o BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment
- o BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beal’s Point

I feel currently feel safe using the trails because the only traffic is slow moving. There are fewer and fewer safe trails that we are able to ride on, hike with our families and run where we can enjoy the outdoors without worrying about dangerous encounters with high speed bikes.

I41-02

It is highly probably that current users of the Pioneer Express will be disenfranchised if additional sections are opened to bicycles, especially where the trails are narrow, single track trails. When bikes are allowed on trails with other slower users, multi-use quickly becomes the exclusive use of the bikes. Trail usage in the Doton and Browns Ravine area, the Darrington Trail, the Granite Bay Center Trail has changed. Traditional trail users have abandoned the trail due to safety and quality of life issues, or use those trails only during weekdays when fewer bikes using the trail.

I41-03

There are already issues with bikes riding illegally, or not following regulations and yielding to equestrians and hikers. There is no enforcement of current regulations. Even though Parks states one of their purposes is to “reduce potential safety issues,” the only mention of “trail safety” action is to “initiate education programs for trail users on proper trail etiquette and trail safety.” Education has been the only thing Parks has done about trail safety in the past 30 years. It isn’t working. There is nothing in the Plan to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail safety reporting programs and a searchable database, or a system in which the public or Parks can return a trail to hiker-horse only after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, to ensure bikes don’t travel at a high rate of speed.

I41-04

The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. We want to

I41-05

**I41-05
cont.**

preserve this trail for foot and equestrian use only.

The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.

I41-06

Sandy Ruggiero, Horseback Rider and Hiker

Sent from [Mail](#) for Windows

From: [sheryl.canutt](mailto:sheryl.canutt@trails@parks.ca.gov)
To: Trails@Parks
Subject: New Draft "Folsom Lake SRA and Folsom Powerhouse SHP RTMP"
Date: Wednesday, October 19, 2022 8:27:10 PM

[You don't often get email from canuttsrus@caltel.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear State Parks, (Folsom Area)
Regarding: "Folsom Lake SRA and Folsom Powerhouse SHP RTMP"

These are my concerns about the draft and I think I am not alone. Considering how much money is spent in the area on horses including boarding, feed, trailers, etc. I hope they are considered economically important and given some priorities when considering new trail rules or construction. The competition with E-bikes on trails happening everywhere makes it even more important to keep certain areas and stretches of trail, just hiking and riding.

PRO:
There are proposals to upgrade the equestrian staging areas at Granite Bay Horse Assembly area and Rattlesnake Bar Equestrian Staging area, VERY needed and has been requested for decades.

CON:
However, several proposed changes are to allow mountain bikes on the historic Pioneer Express Trail between Granite Bay and Beeks Bight and other sections. This nationally recognized trail is has been and is currently hiker/pedestrian. Allowing bikes on these trails is a serious concern. Some of the trail sections are narrow, single track with steep cliffs, where allowing bikes is a significant safety hazard for slow moving hikers and horses.

P.S. Proud owner of two donkeys and a thoroughbred, all rescue.
Sincerely, Sheryl Canutt
canuttsrus@caltel.com
209-352-9258 2280 Grass Valley HWY #109, Auburn, CA 95603

I42-01

From: [Stephanie Hensey](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Saturday, October 29, 2022 9:36:20 PM

t often get email from stephensey@gmail.com. [Learn why this is important](#)

To whom it may concern:

Please don't change the allowed users for the trails that are designated for hikers or hikers and equestrians.

I live in Nevada County, but I have come many times to enjoy the peace, quiet and relative safety of the trails in the Folsom Lake SRA as both a hiker and an equestrian. It's not that I'm opposed to mountain bikes on trails. I am glad that there are other trails available to cyclists, whether multi-use or dedicated. It is my experience, however, that they make the multi-use trails much less safe for other users because they go at high speeds and mostly ignore any (unenforced) rules regarding the rest of us. Where I live, hikers and equestrians have been forced off some multi-use single tracks. These trails have turned into de facto single-use trails. I've nearly been run down several times when I was on foot, and riding a horse is much too risky under those conditions.

Your plans don't include changes to the trails that would force cyclists to slow down, or rangers out there to enforce the rules. The notion that you can educate trail users to make them polite and follow the rules is ludicrous. Those same cyclists that nearly ran me down shouted at me that I shouldn't be there, and disavowed that we were on a multi-user trail. The signage at the top of the trail is prominent and unambiguous, but you can't make people read it or believe it. There is no reason to think your users are going to be any different.

Cyclists have many trails available to them already. Please preserve a few that are safe for slower trail users.

Thank you for your consideration.
Stephanie Hensey

I43-01

From: [Stephen Green](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse State Historic Park RTMP
Date: Sunday, October 30, 2022 2:06:14 PM

often get email from gsg444@sbcglobal.net. [Learn why this is important](#)

Comments:

Page 53 LLN #3 Lake (Nimbus) Overlook Trailhead

No amphitheater should be built on the Lake Nimbus Overlook. Nearby homeowner put up with enough noise from Hazel Ave. They don't need to be subjected to noisy concerts on the Overlook which probably would extend into late evenings. The Overlook closes at 9 p.m. Nearby residents appreciate that and the closure also benefits wildlife in the area.

I44-01

Page 57 #16 Parkshore Access Interpretive Trail

The City of Folsom claims that the eucalyptus grove is a historic resource. In fact, introducing the eucalyptus from Australia was a historic blunder which has had disastrous consequences in California. The RTMP notes that the grove "has presented fire and traffic safety concerns for Folsom Boulevard." It also presents fire and safety concerns for nearby businesses and homes. Eucalyptus groves fed disastrous fires in Berkeley in 1936, in Oakland in 2000 and elsewhere in Northern California. The eucalyptus should be removed and replaced with native oaks. The City of Santa Rosa recently completed a programs to remove eucalyptus within their jurisdiction, following the lead of other cities.

I44-02

Stephen Green
4429 Las Encinitas Dr.
Fair Oaks, CA 95628
016-967-7265

Sent from [Mail](#) for Windows

COMMENT LETTER # I45

From: [Steve Hansen](#)
To: [Trails@Parks](#)
Subject: Folsom Lake SRA
Date: Thursday, October 20, 2022 5:19:58 PM

You don't often get email from outlook_81e1a6f2f5d35cac@outlook.com. [Learn why this is important](#)

How about enforcing the laws pertaining to driving out of bounds. Write some tickets. Why aren't the rangers doing their job ?
Sent from [Mail](#) for Windows

I
I45-01
I

From: Susan Hook
To: Trails@Parks
Subject: FOLSOM LAKE SRA & FOLSOM POWERHOUSE SHP RTMP
Date: Saturday, October 22, 2022 11:05:35 AM

often get email from shook13.sh@gmail.com. [Learn why this is important](#)

Hello,
Thank you for allowing the hikers and equestrians to comment on this proposal.

I am both a hiker and equestrian and have used Folsom Lake trails for 30 years. In the last 5 years, it has become dangerous to ride horses at Folsom due to the over abundance of bike riders who feel the trails belong exclusively to them. Having ONLY ONE trail designated for hikers and equestrians has been the only way to ride or hike safely at Folsom.

I46-01

WHY do bike riders need access to every trail?
WHY are they more important than the hikers and equestrians?
WHY should bikers get preferential treatment when they are the ones who use the trails unsafely by riding too fast, tail gating, not slowing down when passing horses or people, coming up behind at a high rate of speed and scaring both horses and people.
WHO, other than bikers, thinks this is a good idea?
HOW are hikers and equestrians going to move over for the rude, insistent bikers who won't wait for us to get to a safe place?

I46-02

Hikers have a bit more ability than equestrians to move aside. If I am on a horse on a narrow cliff trail and a bike flies up behind me, skids to slow down and "asks" to pass, what am I supposed to do? I have been yelled at, cursed at, and almost had critical injuries to myself and my horse from this type of bike rider. Bike riders have become increasingly rude and contentions as this rarely happened 20 years ago and now happens at least 50% or more on every ride or hike.

I46-03

WHY CAN'T EQUESTRIANS AND HIKERS HAVE ONE TRAIL WITHOUT THE CONSTANT FEAR OF BEING ACCOSTED BY A BIKE RIDER???? In fact, we deserve more than one trail and this should be addressed.

DO NOT OPEN THIS TRAIL TO BIKE RIDERS.

Please feel free to contact me for any questions.

Most Sincerely,
Susan Hook, RN
Psychiatric Nurse for Placer County Children's System of Care
530-432-3960

From: Tammy Yeager
To: Trails@Parks
Subject: CIU at Browns Ravine Folsom
Date: Monday, October 24, 2022 11:34:35 AM

[You don't often get email from tyeagermeister@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Good morning,

I attended the recent board meeting on Oct 21 via zoom.
Thank you for accepting public commentary for this meeting.

There were some great comments made during the meeting.
One that stands out to me was the concept of having a summit committee formed of user groups.
I feel this is something that will bring the most valuable information to the parks system about possible changes in the future.

I47-01

I am a frequent hiker and equestrian at FLSRA.
I also ride with the trail patrol.

I had spoke about a personal experience I had with a few mountain bikers while riding.
I also have heard many other encounters from my riding peers.

We know the Mt bike community has a loud voice.
However, that should not mean that they can over run the rest of the trail users.
The concept TRAILS FOR ALL is something that needs to be considered in this situation.

Should this decision to change Browns Ravine and other trails to multi use go forward, you will be pushing many other users off of the trails for a leisurely hike or ride.
I have already encountered this numerous times on this trail.

I47-02

The separate trails should remain in effect.
Monitoring and enforcement of trail rules should be improved.
Clear and concise signage as well as consequences for trail abusers should be posted.

I47-03

The same rule breakers are the ones who are consistently riding on this trail because they know, there are no consequences.
This needs to change so that the rest of the Trail users will feel safe using these trails and not have to worry about fast riders going by them or possibly being struck.

I hope that the board will re examine this decision to change to multi use. And focus more on enforcing the trail rules to users.
All it would take would be a few rangers positioned on trail for a short time frame.
Once it's known they are there and possible citations will be issued. The traffic will stop by cyclists.
The word travels fast in that community
Even though the multi use decision doesn't take effect for 2 years, they are on that trail now.
Because nothing will happen to offenders.

I47-04

Thank you for your consideration.

Tammy Yeager

=^..^=

From: [Teri Personeni](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Friday, October 28, 2022 11:31:07 AM

You don't often get email from teri@terobmorgans.com. [Learn why this is important](#)

Re:
Folsom Lake SRA and Folsom Powerhouse SHP RTMP

I am pleased to hear that there are plans to upgrade the equestrian staging areas at Granite Bay Horse Assembly area and Rattlesnake Bar Equestrian Staging area.

However, several proposed changes are to allow mountain bikes on the historic Pioneer Express Trail between Granite Bay and Beeks Bight and other sections. This nationally recognized trail is has been and is currently hiker/pedestrian. Allowing bikes on these trails is a serious concern. Some of the trail sections are narrow, single track with steep cliffs, where allowing bikes is a significant safety hazard for slow moving hikers and horses.

I48-01

There are fewer and fewer safe trails that I am able to ride my horse on. I like to ride the Pioneer Express Trail so that there is no fear of speeding bicycles hitting or frightening my horse. I tend to avoid the other trails because it's too dangerous for me and my horse. When bikes are allowed on trails with other slow users multi-use quickly becomes the exclusive use of bikes. There are already issues with bikes riding illegally or not following regulations by yielding to equestrians and hikers. There is no enforcement of current regulations. The education that Parks has tried to do isn't working.

I48-02

The Pioneer Express Trail is a registered historical trail built by pioneers and miners to move up and down the river from Sacramento to Auburn. I hope you will preserve this trail for foot traffic and equestrians only.

The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following

I48-03

the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi-use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.

I48-03
cont.

If bikes want technical trails, where speed is possible without endangering other trail users, separate trails should be built.

I48-04

I do not support allowing bikes on the sections of the Pioneer Express Trail as detailed in:

- ULN#9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing

- BPBG #11 Pioneer Express Trail Change-In-Use: Dike 5 to Dike 6 segment

- BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals

- Point Entrance Road

- BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1

I currently feel safe using the trails because the only traffic is slow moving.

I48-05

I support:

- BPBG #10 North Fork Shoreline/Low-Water Multi-use Access Route

 - Officially signed as hiker/equestrian

 - Adding facilities to Equestrian Staging Areas

 - BPGB #5 Granite Bay Horse Assembly area

 - NFAR #2 Rattlesnake Bar Equestrian Staging Area.

Thank you for your consideration.

Sincerely,

Teri Personeni

teri@terobmorgans.com

Nevada City, CA 95959

From: [William Van Roo](#)
To: Trails@Parks
Subject: Folsom Lake SRA and Folsom Powerhouse SHP RTMP
Date: Friday, October 28, 2022 12:04:01 PM

I live in Nevada County, Ca. I have used the trails in the park for 20 years and am a member of the Folsom Lake Trail Patrol for the best 15 years. My primary use has been equestrian and now I use the trails with grandchildren on foot.

I do not support allowing bikes on the sections of the Pioneer Express trail as detailed in:

- o ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing
- o BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment
- o BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road
- o BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1

There are fewer safe trails that we are able to ride on, hike with our families and run where we can enjoy the outdoors without worrying about dangerous encounters with high speed bikes.

I49-01

On multiple occasions, I've had dangerous encounters with high speed bikes that aren't paying attention to other trail users, or yielding to hikers and equestrians.

It is highly probable that current users of the Pioneer Express will be disenfranchised if additional sections are opened to bicycles, especially where the trails are narrow, single track trails. When bikes are allowed on trails with other slower users, multi-use quickly becomes the exclusive use of the bikes. Trail usage in the Doton and Browns Ravine area, the Darrington Trail, and the Granite Bay Center Trail has changed.

There are already issues with bikes riding illegally, or not following regulations and yielding to equestrians and hikers. There is no enforcement of current regulations.

Even though Parks states one of their purposes is to "reduce potential safety issues," the only mention of "trail safety" action is to "initiate education programs for trail users on proper trail etiquette and trail safety." Education has been the only thing Parks has done about trail safety in the past 30 years. It isn't working. While there are numerous compinat bike users thee abusive users are fully aware that there is absolutely no enforcement or any threat of a real legal repercussion for their actions.

There is nothing in the Plan to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail safety reporting programs and a searchable database, or a system in which the public or Parks can return a trail to hiker-horse only after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, to ensure bikes don't travel at a high rate of speed. Even if citations are issued for illegal use the courts do not enforce them in a realistic manner.

I49-02

The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. The park needs to preserve this trail for foot and equestrian use only.

The bikes have plenty of trails to use, with miles of paved trails from Granite Bay,through

I49-03

beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi-use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.

o Adding facilities to Equestrian Staging Areas

§ BPG#5 Granite Bay Horse Assembly area

§ NFAR #2. Rattlesnake Bar Equestrian Staging Area

Yours truly,

WILLIAM A. VAN ROO
530.268.8498
13863 Quarterhorse Dr.
Grass Valley, CA 95949-7816

I49-03
cont.

Rourke Healey

From: Glinda Penney <glindapenney@gmail.com>
Sent: Sunday, October 30, 2022 8:18 PM
To: Trails@Parks

n't often get email from glindapenney@gmail.com. [Learn why this is important](#)

I oppose the proposed changes to allow mountain bikes on the historic Pioneer Express Trail. The safety issue of combining bikes with foot and horse traffic is of utmost concern. These single track trails are not safe for bikes and horses to meet. The blind, sharp corners and steep drop offs combined with the speed of bikes creates a disaster in the making. Please consider the safety of hikers and equestrians in considering this change.

I50-01

The single track trails at Folsom Lake State Recreation Area are not safe for these users to mix.

There are many trails in the area that are multi-use and are appropriate for bicyclists. The areas Hidden Falls and Cool, Cronin and Magnolia are examples of wide trails that can accommodate multiple types of users.

I50-02

Please consider the safety issue when studying these changes to this historically significant trail.

Glinda Penney

6160 Chrysler Circle, Garden valley, CA 95633

Robert H. Sydnor
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American Endurance Ride Conference

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www.aerc.org • 866-271-2372 • office@aerc.org

Robert Hadley Sydnor
A.E.R.C. California Statewide Trails Advocate
RHSydnor@gmail.com 916-335-1441

February 28, 2022

**Subject: Second Letter re: Opposition to Mountain Bikes
on Brown's Ravine Equestrian Trail in
Folsom Lake State Recreation Area**

Dear California State Parks Officials
attention: Ms. Alexandra Stehl, State Parks Trails Officer

This is a follow-up my two-page January 24, 2022 public comment letter with nine bulleted points regarding Brown's Ravine Trail within Folsom Lake State Recreation Area. There are significant **new safety issues** that have recently come to light.

1. Under CEQA, it is **legally necessary** for an **"Initial Study"** for the proposed action to open the hiking and equestrian trail at Brown's Ravine to use by high-speed eBikes and Mountain Bikes. After the "CEQA Initial Study" report is prepared it will become self-obvious from a legal standpoint that **"A Focused Environmental Impact Report"** will be required under the California Environmental Quality Act.

It is not legal for a **proposed "Change in Use" plan** to be *cleverly used to avoid state environmental law*.

No decision can legally be made by management of the California Department of Parks and Recreation until the CEQA process is completed. At the same time, a "regular" detailed (and expensive) CEQA report (typically a thousand pages) is certainly **NOT** needed for Brown's Ravine Trail. This would be a huge waste of time and money for California Taxpayers. Everyone needs to stay focused on only the specific safety issues.

2. **eBikes** are a known *hazardous “gateway” for motorcycles* and faster classes of eBikes. We need official signage to send these users to Prairie City State Vehicle Recreation Area.
3. **Public safety** is of **paramount importance**. Public safety is not and cannot be cleverly relegated to a low-level of importance; this will not prevail in Superior Court.
4. **Mountain bikers** are already **illegally using the Brown’s Ravine Trail**. State Park signage has been deliberately **vandalized by mountain bikers**. State Parks officials have never (yet) arrested and cited mountain bikes on this trail. Illegal trail use and vandalism of official signs needs to be properly enforced.
5. The **cell-phone reception** is limited and often dark along Brown’s Ravine Trail. That means that it is not possible, in the event of a tragic emergency, to call 911 for emergency help, resulting from a serious crash between a horse and a fast-speeding mountain bike on a blind turn.

An important safety mitigation measure resulting from the “Focused CEQA Report” would be for a cell-phone company (such as AT&T or Verizon) to install at **least three cell phone towers**. This will be highly useful for ambulance and rescue workers to respond in a timely manner when a crashed equestrian and/or mountain biker’s life is at stake.

In routine communications, State Park Rangers will also benefit from three new cell phone towers in this area. This would help with emergency response to boating accidents and drownings. *So:* cell-phone towers would be a win—win situation for everyone.

6. There are several open-space areas that could be marked with a circled **H** white symbol so that rescue helicopters would know where to safely land. These circled **H** helicopter landing sites would need to be leveled by mechanical earth-moving machines (*e.g.*, bulldozers).

Besides the Brown’s Ravine Trail area, these ⊕ Helicopter emergency landing sites will also be highly useful boating accidents and near-drownings on this arm of Folsom Lake. Again, a win—win situation for public safety.

7. Elsewhere within Folsom Lake State Recreation Area, **mountain bikers** have illegally built bike-jumps that are hazardous and unsafe. **Horses are terrified of airborne mountain bikes**, and typically will **spook, bolt, and throw** the rider.

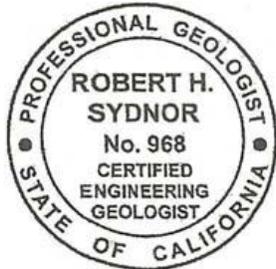
Broken bones and broken necks typically result. Who will be **legally responsible** for the medical costs of these potential tragic accidents? Personal injury litigation for huge sums of money *may* result. This potential serious litigation situation needs to be fully evaluated in the forthcoming ***“Focused CEQA Report.”***

8. The (future) Focused CEQA Report should consider the **safety** benefits of a **second parallel trail** that is dedicated to mountain bikes and e-Bikes. There should be no lateral passages between the two trail systems. That would avoid any “accidental” incursions of high-speed mountain bikes onto the safe horse trail. Fallen dead trees can be pulled into place to block any lateral passages.

A full-width mountain bike trail (essentially a jeep road) would also help to provide access to fire-trucks in the event of a forest fire. This would increase public safety. Horrible forest-fires (like the nearby CalDoor Fire) are here to stay because of climate change. We need to plan for fire safety.

Respectfully submitted,

Robert H. Sydnor



Robert Hadley Sydnor
A.E.R.C. California State Trails Advocate
A.E.R.C. Trail Master (*licensed trail maintenance*)
Fellow, Geological Society of America
Board Member, Mother Lode Unit
of Backcountry Horsemen of California