

## 2 Revisions to the Preliminary GP and Draft RMP

This chapter presents specific text changes made to the Preliminary General Plan and Draft Resource Management Plan (Preliminary GP/Draft RMP) since its publication on August 27, 2019. California State Parks (CSP) and the U.S. Bureau of Reclamation (Reclamation) carefully considered all comments submitted on the contents and merits of the Preliminary GP/Draft RMP and made a good faith effort to incorporate corrections, clarifications, and appropriate revisions to the GP/RMP consistent with the purpose and need, and objectives of the Preliminary GP/Draft RMP. The information contained within this chapter clarifies and expands on information in the Preliminary GP/Draft RMP and makes minor revisions that are expected to lessen potential environmental effects. None of the changes would result in any new significant effects or substantial increases in previously identified significant effects, so recirculation of the Draft EIR/EIS is not warranted. The latest version of the GP/RMP that was revised in response to comments received in response to the public release of the Preliminary GP/Draft RMP and Draft EIR/EIS is referred to as “revised Preliminary GP/Draft RMP.”

The changes are presented in the order in which they appear in the original GP/RMP and are identified by the respective page number. Text deletions are shown in ~~striketrough~~, and text additions are shown in underline.

Note: Certain Adobe screen readers cannot decode the meaning of underlined or strike-through text within PDF documents. Due to this recognized problem with the accessibility software, accessible Microsoft Word versions of this Final EIR/EIS are also available. If you require an accessible Microsoft Word document, please download it from the GP/RMP website: <https://www.parks.ca.gov/PlanASRA>.

### 2.1 Evaluation of the Preliminary GP and Draft RMP Modifications

In response to comments received during the public review period for the Preliminary GP/Draft RMP and Draft EIR/EIS, CSP and Reclamation propose a number of revisions to the Preliminary GP/Draft RMP. These changes include clarifications and a reduction in the maximum number of campsites allowed within ASRA/APL.

#### 2.1.2 Clarifications

Several sections of Chapter 2, Existing Conditions, and Chapter 4, The Plan, were revised to more clearly articulate or expand upon information included in the Preliminary GP/Draft RMP. The revisions to Chapter 2 of the GP/RMP more fully describe existing conditions related to visual quality, Native American Tribal heritage (including California Native American Tribes, federally recognized, and non-federally recognized tribes), and contemporary Native American use of ASRA/APL. The revisions clarify the existing conditions related to these resources but do not alter the environmental setting or affected environment that formed the basis of the environmental effects analyses in the Draft EIR/EIS.

The clarifications in Chapter 4 of the Preliminary GP/Draft RMP include revisions to Goals, Guidelines, and other text that were made to more clearly describe the intent of the Preliminary GP/Draft RMP. Several comments recommended that specific provisions be added to the Preliminary GP/Draft RMP. Where existing goals or guidelines address these recommendations, the text of the goals and guidelines were revised to explicitly state how the guideline addressed the recommended provisions. These changes more

clearly describe the intent of the guidelines or provide additional detail on how the guideline would be implemented. One new goal and a number of new guidelines were added to the Preliminary GP/Draft RMP. A new Goal FAC 9 and Guideline FAC 9.1 describe the comprehensive planning process that would occur prior to the development of any new or expanded facilities in ASRA/APL. A new Guideline RES 9.7 describes the site-specific assessment that CSP would perform to determine if campfires would be allowed at individual new campsites and describes site-specific campfire management options. A new Guideline RES 7.2 describes how best practices for the protection of Tribal Cultural Resources would be implemented in coordination with California Native American Tribal groups. Each of these new or revised guidelines would make explicit standard processes or approaches that are implemented by CSP and Reclamation or provide additional details on environmentally-protective measures included in the GP/RMP.

## 2.1.3 Reduction in Maximum Number of Planned Campsites

The Preliminary GP/Draft RMP that was released with the Draft EIR/EIS allowed for the future development of up to 224 new campsites. The Draft EIR/EIS conservatively analyzed the effects of up to 230 new campsites to avoid understating potential environmental effects of new campsites. Numerous comments opposed the creation of new campsites. In response, CSP and Reclamation completed a refined assessment of the number of new campsites in those Activity Nodes where campsites were allowed and reduced the total maximum number of new campsites allowed from 224 sites (220 individual sites and four group sites) to 142 sites (135 individual site and seven group sites). Revisions have been made to the applicable guidelines of the GP/RMP to reflect the reduced number of campsites, which includes removing the proposal for new campsites in the Foresthill Divide Management Zone (Guidelines MZ 1.1, MZ 6.2, MZ 23.1, MZ 26.1, MZ 26.2, and MZ 31.1). The changes in the number of campsites included in the revised Preliminary GP/Draft RMP are shown in Table 2-1.

**Table 2-1 Existing Number of Campsites and Originally Proposed and Revised Numbers of New Campsites**

Management Zone	Existing Number of Campsites	New Campsites Originally Proposed in the GP/RMP	Revised Number of New Campsites in the GP/RMP <sup>1</sup>
Knickerbocker	0	50 individual	50 individual <sup>2</sup>
		3 group	3 group
Auburn Interface	0	50 individual	25 individual <sup>2</sup>
		0 group	3 group
Lake Clementine	15 individual	0	0
Foresthill Divide	0	20 individual	0
Mammoth Bar	0	50 individual	15 individual
Cherokee Bar/Ruck-a-Chucky (Cherokee Bar)		20 individual	15 individual
		1 group	1 group
Cherokee Bar/Ruck-a-Chucky (Ruck-a-Chucky)	5 individual	10 individual	10 individual
Mineral Bar	16 individual	20 individual	20 individual
<b>Total New Individual Sites</b>	<b>—</b>	<b>220</b>	<b>135<sup>2</sup></b>
<b>Total New Group Sites</b>	<b>—</b>	<b>4</b>	<b>7</b>
<b>Total Existing Sites</b>	<b>36</b>	<b>—</b>	<b>—</b>
<b>Total Campsites (New + Existing)</b>	<b>—</b>	<b>260</b>	<b>178</b>

<sup>1</sup> Campsites may be either designated as individual or group sites (1 group site is equivalent to 5 individual sites), but the overall space and visitation estimates would not be exceeded from what is presented here.

<sup>2</sup> The total new individual campsites would include up to a maximum total of 15 alternative camping options (e.g., cabins, yurts, or other similar structure), which could be included in the new campsites located in the Knickerbocker and/or Auburn Interface Management Zones.

Source: Compiled by Ascent Environmental in 2020

Given that fewer campsites would be constructed and operated into the future compared to the Preliminary GP/Draft RMP evaluated in the Draft EIR/EIS, there would be likely be decreased environmental effects as a result, including effects on air quality, geology and soils, greenhouse gas emissions, transportation and circulation, public services and utilities, noise, and wildfire. The reduction in the number of campsites would not affect the significance determination with respect to any of the resource analyses in the Draft EIR for the purposes of CEQA, nor would they increase the intensity or alter the context of any direct, indirect or cumulative effects for the purposes of NEPA. These revisions do not constitute “significant new information” requiring recirculation. (See Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5.)

## 2.2 Revisions to Executive Summary Chapter

There were no revisions to the Executive Summary Chapter.

## 2.3 Revisions to Chapter 1, Introduction

There were no revisions to Chapter 1, Introduction.

## 2.4 Revisions to Chapter 2, Existing Conditions

In response to comments I233-2 and I151-2, the following information has been added to clarify existing conditions information related to flows on the Middle Fork and North Fork of the American River. The following edits are made to the “Dams and Hydropower Facilities” section under Section 2.2.1, Physical Resources, of the Preliminary GP/Draft RMP on page 2-10:

~~The Middle Fork American River is used for both water supply and hydroelectric power generation upstream of ASRA/APL. PCWA operates the Middle Fork Project (MFP), which includes a series of dams, reservoirs, diversion tunnels and powerhouses in the Middle Fork watershed. French Meadows Reservoir and Hellhole Reservoir provide the majority of storage capacity for the Middle Fork Project (332,943 acre/feet combined total) (USGS 2018). The MFP’s major storage reservoirs, French Meadows and Hell Hole, have a combined capacity of 342,583 acre-feet with water released to the lower Middle Fork at Ralston Afterbay and Oxbow Powerhouse (PCWA 2020a). Natural flows in the Middle Fork are largely reliant on precipitation and runoff. Upstream hydropower facilities also generate flows for PCWA’s water supply, power needs, and in accordance with Federal Energy Regulatory Commission (FERC) licensing requirements.~~

PCWA owns and operates the MFP for municipal drinking water delivery, irrigation, and electrical hydropower generation. The MFP generates an average of about 1 million megawatt-hours (MWh) per year. The amount of water that flows in the Middle Fork of the American River is determined by seasonal precipitation, snow melt, water rights previously granted, and through the FERC permitting process. Water storage in existing reservoirs changes the timing of runoff, which in turn influences the peak flows and the summer base flows. A major portion of the seasonal flow occurs during the late spring and the early summer months. Discharge varies widely from month to month and from season to season. Essentially, there are many external factors that affect flows on the Middle Fork of the American River, including weather patterns, snowmelt runoff, and operating to the requirements of the hydroelectric project, which includes the protection of environmental resources and providing for recreation.

PCWA provides real-time flow data on the internet (<https://www.pcwa.net/recreation/flows/gages/>) for its stream gages, two of which are relevant: R11 stream gage, Middle Fork American River; and R31 stream gage, North Fork American River above the American River Pump Station (PCWA 2020b, 2020c). This data allows those recreating in the river to take advantage of suitable flows provided by the project and enables them to assess recent streamflow conditions. This information benefits equestrians, river boaters and swimmers who can avoid times when there are high flows that could exacerbate the inherent risks of river recreation.

In response to the comment O10-35 related to debris in the river as a visual quality detraction, the following edits have been made to the “Elements Detracting from Visual Quality” section under Section 2.2.4, Scenic Resources, of the Preliminary GP/Draft RMP on page 2-67:

Built features associated with the Auburn Dam site, diversion tunnel, and PCWA pump station project located on the North Fork of the American River, affect views of the canyon with built features and alterations to natural features, including the presence of access roads, exposed bedrock of the dam keyway, presence of the pump station, and concrete abutments. Other human-made features that detract from the visual quality in ASRA/APL include metal and concrete debris at various locations in the North Fork American River and Middle Fork American River, including debris from the collapsed Highway 49 Bridge near the confluence.

In response to comment O5-9 related to acknowledgement of tribes that continue to live within the vicinity of the ASRA/APL, the following revisions have been made to the “Ethnographic Setting,” section located on page 2-55 of the Preliminary GP/Draft RMP Existing Conditions:

Ethnographic and linguistic studies indicate that ASRA/APL around the North and Middle forks of the American River was the traditional homeland of the Nisenan or Southern Maidu (Beals 1933; Golla 2007; Kroeber 1925, 1929; Wilson and Towne 1978). Today, contemporary Native Americans are culturally and traditionally affiliated with ASRA/APL and continue to use the landscape for religious and ceremonial purposes.

In response to comment O5-10 related to California Native American Tribal heritage, the following revisions have been made to the “Cultural Resources in ASRA/APL” section located on page 2-57 of Chapter 2, Existing Conditions, in the Preliminary GP/Draft RMP:

Evidence of a rich cultural heritage is abundant within ASRA/APL related to the California Native American Tribal heritage, mining, transcontinental railroad, water conveyance, timber harvesting, ranching, agricultural development, and dam planning or construction.

In response to comment O5-11 related to “Prehistoric” and “California Native American Tribal sites” terminology, the following text changes have been made to the Chapter 2, Existing Conditions, of the Preliminary GP/Draft RMP in the first, second, and third paragraphs on page 2-57:

Evidence of Native American, prehistoric, and historic land use has been documented in ASRA/APL mainly by cultural resources surveys conducted by archaeologists in the 1960s and 1970s...

## Prehistoric Resources

The majority of documented prehistoric archaeological/California Native American Tribal sites in ASRA/APL are habitation sites with milling stations and bedrock mortars, some with more

than a dozen milling surfaces. Twenty-six well-defined mortars were reported in one location (Childress and Ritter 1967). Other known prehistoric/California Native American Tribal sites include surface artifact scatters, buried deposits or middens, petroglyphs, rockshelters, and a chert toolstone quarry. At least one prehistoric/California Native American Tribal site (CA-ELD-16), which was subsequently destroyed by limestone quarrying, was found to contain human remains (Wallace and Lathrap 1952).

Prehistoric archaeological and California Native American Tribal sites are not distributed randomly throughout the landscape but tend to occur in specific geo-environmental settings (Pilgram 1987; Rosenthal and Meyer 2004).

## 2.5 Revisions to Chapter 3, Issues and Analysis

No revisions to Chapter 3, Issues and Analysis, of the Preliminary GP/Draft RMP.

## 2.6 Revisions to Chapter 4, The Plan

In response to a comment submitted by the California Department of Fish and Wildlife (CDFW) regarding wildlife surveys, Guideline RES 3.1 on page 4-13 of the Preliminary GP/Draft RMP has been revised to read as follows:

**Guideline RES 3.1:** Conduct appropriate level of surveys throughout the ASRA/APL and prior to design and construction within individual project areas, to identify ~~Survey, identify,~~ and map sensitive plant and animal species in order to better protect them.

In response to a comment submitted by CDFW regarding the location of new trails, facilities, and ground- or vegetation-disturbing activities within occupied habitat, Guideline RES 3.4 on page 4-14 of the Preliminary GMP/Draft RMP has been revised to read as follows:

**Guideline RES 3.4:** Locate new trails, facilities, and ground- or vegetation-disturbing activities outside of ~~occupied~~ habitat suitable for special-status plant and animal species, ~~where feasible~~. Where impacts on special-status species or their suitable habitat are unavoidable, develop project-level measures to minimize impact to special-status plant and animal species and their habitat in consultation with the appropriate state and/or federal resource agencies under the CESA and ESA, respectively.

In response to requests by the United Auburn Indian Community (UAIC) to expand Guideline RES 5.3 to include coordination with California Native American Tribal descendants, Guideline RES 5.3 on Page 4-16 has been revised as follows:

**Guideline RES 5.3:** Locate descendants of families who lived or worked within ASRA/APL, ~~during the historic era~~. Include Native American Tribal descendants, homesteaders, miners, farmers, ranchers, WPA or CCC workers, ASRA/APL staff, and others. Conduct oral history interviews to complement and expand upon existing ~~historic-era~~ historical data on early use in ASRA/APL and help in locating, identifying, and evaluating additional historic and archaeological resources.

In response to requests by the UAIC to coordinate with California Native American Tribal groups in the preparation of a Cultural Resource Management Plan, Guideline RES 6.1 on page 4-17 of the Preliminary GP/Draft RMP has been revised as follows:

**Guideline RES 6.1:** Prepare a comprehensive Cultural Resources Management Plan that identifies specific cultural resource identification, evaluation, and protection actions. Coordinate with California Native American Tribal groups and other agencies with relevant information and expertise in the preparation of the Cultural Resource Management Plan.

In response to requests by the UAIC to protect cultural resources from excessive fire fuel loads, Guideline RES 6.6 on page 4-18 of the Preliminary GP/Draft RMP has been revised as follows:

**Guideline RES 6.6:** Develop measures to protect cultural resources during wildfire incidents and post-fire restoration and revegetation, and measures to protect cultural resources from excessive fuel loading by implementing appropriate fuel reduction techniques.

In response to requests by the UAIC to implement best practices for the protection of Tribal Cultural Resources, the following new guideline has been added to page 4-18 of the Preliminary GP/Draft RMP:

**Guideline RES 7.2:** Coordinate with Native American Tribal groups to develop and implement best practices for the consideration of Tribal Cultural Resources, which could include site visits with tribal representatives, identification and evaluation of cultural and Tribal Cultural Resources, inviting tribal monitors to monitor ground disturbing activities, and consultation and coordination with tribal monitors and/or designated tribal representatives. Incorporate best practices for protection of Tribal Cultural Resources and historic property into the ASRA/APL Cultural Resource Management Plan, as appropriate.

To clarify that the GP/RMP addresses vegetation management along roadways within ASRA/APL, rather than along county or state highways, and to clarify that vegetation management may exceed standard CSP guidelines if directed by the Fire Management Plan (FMP); the following revisions have been made to Guidelines RES 8.5 on page 4-19 of the Preliminary GP/Draft RMP.

**Guideline RES 8.5:** Monitor and manage vegetation along ASRA/APL roadways and trails consistent with CSP's vegetation and management guidelines and as identified in the Auburn FMP.

To clarify the timing of fuel reduction and defensible space treatments associated with new or expanded facilities, Guideline RES 8.6 on page 4-20 of the Preliminary GP/Draft RMP has been revised as follows:

**Guideline RES 8.6:** Monitor vegetation conditions, reduce excess fuel loading, and maintain appropriate defensible space surrounding existing recreation facilities including parking areas, campgrounds, picnic areas, and other sites with heavy visitation. Implement appropriate fuel reduction and defensible space treatments surrounding any new or expanded facilities or newly opened roads or trails, prior to or in conjunction with constructing or expanding the facility or opening the road or trail for public vehicle access.

To clarify that additional restrictions on public use would be required in response to wildfire hazard conditions, Guideline RES 9.2 on page 4-21 of the Preliminary GP/Draft RMP has been revised as follows:

**Guideline RES 9.2:** Enact and enforce additional restrictions on public use based on wildfire hazard conditions in order to provide for public safety and to protect resources. Additional restrictions on public use ~~may~~shall be implemented based on wildfire hazard conditions including wind, temperature, time of year and other factors. ~~These~~Additional temporary restrictions ~~could vary~~ shall be implemented depending on the severity of wildfire hazard conditions, ~~such as. They may include, but are not limited to:~~

- ◆ Prohibiting campfires or open flames within ASRA/APL;
- ◆ Prohibiting smoking within ASRA/APL;
- ◆ Limiting portable stove use to designated campgrounds; and/or
- ◆ Temporary closure of portions of ASRA/APL to public use.

In response to comment A8-8, clarifying text has been added to Guideline RES 9.6 to acknowledge that water supplies for fire suppression would be available, where appropriate, at new or expanded facilities, such as campgrounds. The following edits are included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, and have been made to Guideline RES 9.6 on page 4-22 of the Preliminary GP/Draft RMP:

**Guideline RES 9.6:** Where determined appropriate, such as at campgrounds or special event locations, make emergency fire suppression equipment or resources available, which could include fire hydrants, water tanks, and water drafting equipment, ~~such as~~ at campgrounds or special event locations. Train appropriate CSP staff in basic wildland fire response and safety. Coordinate the placement of fire suppression equipment and resources through CAL FIRE and the appropriate local fire districts.

In response to comments that expressed concern related to wildfire risk associated with campfires at new campsites, the following guideline has been added to page 4-22 of the Preliminary GP/Draft RMP to clarify the process for determining the appropriate management of campfires:

**Guideline RES 9.7:** Prior to developing a new campground or expanding an existing campground, Reclamation and CSP will determine whether campfires should be allowed and identify potential onsite campfire restrictions. Preliminary decisions will be vetted by Reclamation and CSP through CAL FIRE and applicable local fire districts, and will consider risk factors including accessibility and response times; proposed campground staffing; and site-specific fire hazard risk factors including grade, topography, vegetation, and adjacent fuel conditions. The site assessment will identify campfire management requirements specific to each new or expanded campground, which could include prohibiting campfires, allowing a limited number of shared campfires or one central campfire, allowing only natural gas campfires and/or gas cook stoves, or allowing individual campfires at each campsite.

In response to requests by the UAIC to incorporate traditional Nisenan or Miwok place names into trail names, Guideline V 2.1 on pages 4-34 to 4-35 has been revised as follows:

**Guideline V 2.1:** Prepare a Road and Trail Management Plan that addresses development, coordinated use, opportunities for future trail development and improvements, connectivity parking, access, and current uses of trails within ASRA/APL, including the following components:

- ◆ Identify new trail facilities, including trail extensions, trail connections, trailheads, access points, and other trail features;
- ◆ Identify specific enhancements to existing facilities, including minor facility expansion, maintenance projects and programming, interpretive opportunities and signage;
- ◆ Follow the CSP Trails Handbook guidelines in siting/layout, designing, constructing and maintaining sustainable trails;
- ◆ Establish a consistent wayfinding and sign program with information provided at trailheads;
- ◆ Help identify and prioritize trail-maintenance needs;
- ◆ Include standardized trail designs and traffic engineering practices to reduce the potential hazards and perceptions of user conflicts;
- ◆ Proactively identify priority trail segments that can provide Americans with Disabilities Act (ADA) trail access consistent with existing accessibility policy, plans and programs;
- ◆ Establish trail safety and etiquette messages that can be incorporated into education programs;
- ◆ Identify non-system, user-created trails and determine whether to remove and restore them, or incorporate them into the designated trail system;
- ◆ Coordinate the management of trails with the management of river uses by providing river-access points for trails users and trails that access popular put-in or take-out spots for river users;
- ◆ Develop a policy regarding when, where, and for what duration to close trails during wet weather to prevent trail damage, erosion, and water quality impacts; ~~and~~
- ◆ Clarify and determine the specific route of the Western States Pioneer Express National Recreation Trail; and
- ◆ Recommend changes to trail names in consultation with Native American Tribes to incorporate traditional Nisenan or Miwok place names and remove culturally-insensitive trail names.

To clarify that special event traffic management plans would address vehicle circulation within and outside of ASRA/APL, Guideline V 5.5 on page 4-37 of the Preliminary GP/Draft RMP has been revised as follows:

**Guideline V 5.5:** CSP will require that special events submit and implement a traffic management plan to provide appropriate parking and access for the event while maintaining acceptable traffic flow on roadways within and outside of ASRA/APL.

In response to comment O10-38, the introductory text for goals and guidelines related to facilities has been revised to clarify that Reclamation and CSP policies provide direction on facility management based on a number of factors, including public safety. The following edit has been made to the last paragraph on page 4-38 and first paragraph on page 4-39 under Section 4.33, Facilities, in the Preliminary GP/Draft RMP:

Facility development and management at ASRA/APL is guided by a host of federal and state laws and regulations. Reclamation directives and standards provide direction regarding direct facility planning throughout the majority of ASRA/APL on lands owned or withdrawn by Reclamation. CSP policies, including those policies that comprise the DOM, provide direction on facility management including accessibility, sustainability planning, public safety, and protection of natural and cultural resources. The goals and guidelines included in this plan provide additional guidance that is specific to the management of facilities in ASRA/APL. Taken together, the goals and guidelines in this plan, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for facility management in ASRA/APL.

In response to comments opposed to the number of new campsites allowed within ASRA/APL, and based on a reasoned estimate of the number of new campsites that can be sited in various areas of ASRA/APL due to topography and other constraints, the following guideline has been revised on page 4-40 of the Preliminary GP/Draft RMP to reduce the total number of campsites that could be developed within ASRA/APL. Note that this guideline has also been revised to list the total number of campsites, including existing campsites. The revised maximum number of potential new campsites would be 142; the total including existing campsites would be 178.

**Guideline FAC 2.2:** Provide camping opportunities to assist in meeting regional and state-wide demand. Provide a total of up to 178~~235~~ individual campsites, which includes five seven group sites (or the spacing equivalent of one group site = five individual sites); and 15 alternative camping facilities, such as cabins or yurts or other similar structures. At the time this GP/RMP was prepared, there are 36 campsites within ASRA/APL. An additional 142 campsites could be added to reach the total of 178 campsites.

In response to concerns about increased vehicle traffic associated with the GP/RMP and potential effects in nearby residential streets, the following new guideline has been added to page 4-42 to support the addition of signage to guide visitors away from residential streets:

**Guideline FAC 4.4:** Coordinate with the appropriate local government agencies to install signage on Maidu Drive and in other appropriate areas to direct visitors away from residential streets.

In response to comments that requested additional information on activities that would occur prior to the development of new or expanded facilities (i.e., beyond existing footprint of an existing facility), the following new goal and guideline has been added to a new Comprehensive Project Planning section on page 4-44 of the Preliminary GP/Draft RMP:

**GOAL FAC 9:** Conduct comprehensive project level planning and evaluation prior to the development of any new or expanded facilities (i.e., beyond the existing footprint or capacity) identified in the GP/RMP.

**Guideline FAC 9.1:** Comprehensive project level planning for new or expanded (i.e., beyond the existing footprint or capacity) facilities will include:

- ◆ Evaluation, identification, and development of adequate parking, public access, and emergency ingress/egress to the proposed facility.

- ◆ Identification and implementation of fire fuel clearance and defensible space around a proposed facility to include emergency access routes as part of the planning and construction of the facility in coordination with fire safety councils, CAL FIRE, and local fire protection departments or districts.
- ◆ Development of an emergency evacuation plan for the proposed facility (ensure consistency with park-wide emergency evacuation plan – Guideline RES 10.1).
- ◆ Reclamation and CSP will conduct interagency coordination regarding the proposed facility development and project-level planning with the following: State Fire Marshal, CAL FIRE, local fire and public safety agencies, affected local jurisdictions, and other agencies and districts.
- ◆ Evaluation of and provisions for the level of staffing and funding needed to operate, manage, and maintain the facility.
- ◆ Prior to facility development within the GP/RMP, implement a public involvement process to engage the local community, park visitors, and other interested members of the public at early stages of project development and thereafter as needed.
- ◆ Completion of the required level of environmental review and analysis addressing all required issues (e.g., cultural resources, biological resources, etc.), including a site-specific inventory of natural and cultural resources.
- ◆ For campgrounds, determine whether campfires would be allowed and identify potential onsite campfire restrictions based on wildfire hazard conditions, including topography and slope, surrounding vegetation type and density, emergency access, wind, temperature, time of year, and any other applicable factors (see Guideline RES 9.2 and RES 9.7).
- ◆ Ensure project consistency with ASRA/APL goals and guidelines of the GP/RMP.

In response to requests by the UAIC to expand the primary interpretive theme related to Native Americans to more fully explain how Native Americans used and continue to use aspects of the environment at ASRA/APL, interpretive Primary Theme I on page 4-47 to 4-48 of the Preliminary GP/Draft RMP has been revised as follows:

### **Primary Themes**

**I. ~~Native Americans~~ Native American Tribes:** The American River is the centerpiece of the lifestyle of the native people who have lived here for thousands of years prior to the arrival of Euro-Americans, relying on the bounty of the land and river.

- ◆ Importance of fall and spring salmon runs
- ◆ Harvest of acorns and grinding them into flour using grinding rocks along the river (prominent at Confluence)
- ◆ Villages along the banks of the river
- ◆ Use of the ridges along the river as a trading route, connecting them with people of the Tahoe Basin and of the California Coast

- ◆ Harvested native plants and other elements of their environment for sustenance, dwellings, clothing, weapons, adornments, and other uses
- ◆ Contemporary California Native American Tribal groups continue to use the landscape for religious and ceremonial purposes

In response to comments requesting greater recognition of river safety hazards, including the risks of drowning and debris in the river, the following edits have been made to Goal I&E 1 and associated guidelines on pages 4-50 and 4-51 of the Preliminary GP/Draft RMP:

**GOAL I&E 1:** Provide ASRA/APL visitors with educational information on how to be properly equipped and prepared prior to visiting ASRA/APL; help visitors understand the , and location where they are choosing to recreate and the character of hazards they may encounter, including hazards of the river and drowning, so that visitors are able to use their best judgement in ensuring a safe recreation experience. River hazards include changeable flows and river levels; cold, fast moving water; rapids and turbulent water; rocks; logs; and other debris in the river.

**Guideline I&E 1.1:** Provide interpretive information at the major areas of visitor concentration focused on raising awareness of the various hazards in the area, such as mountain lions, drowning and other river hazards, poison oak, and ticks.

**Guideline I&E 1.3:** Provide CSP staffed interpretive opportunities during peak use periods at the major areas of visitor concentration in ASRA/APL to raise awareness of the various hazards in the area, such as mountain lions, poison oak, ticks, drowning risks, and lack of potable water supplies.

**Guideline I&E 1.5:** Develop recreation user training and associated resources focused on recreational safety for various user groups identified use. These resources could be coordinated with other agencies where other agencies have specialized knowledge or where activities cross jurisdictions.

**Guideline I&E 1.6:** Develop a training session with PCWA staff to help CSP rangers and others who are working in ASRA/APL better understand the coordination of river operations and the effects on flows above and below the confluence of the Middle and North Forks of the American River. Determine if there are ways to better prepare for quick changes in releases and to send out warnings ahead of these changes to those who are boating, swimming, or might be using stream crossings and may be caught unaware.

In response to comments recommending the preparation of an Interpretation Master Plan, the following guideline has been added to page 4-51 of the Preliminary GP/Draft RMP:

**Guideline I&E 1.7:** Prepare an Interpretation and Education Master Plan to implement the strategies outlined in the Interpretation and Education goals and guidelines consistent with the interpretive themes outlined in this GP/RMP.

In response to comment O10-39 that requested that a reference to LND 01-03 be included in Chapter 4, The Plan, of the Preliminary GP/Draft RMP, the following edits have been made to add a new paragraph after the second paragraph on page 4-55 under Section 4.3.5, Operations, in the Preliminary GP/Draft RMP:

Policies included in the DOM and CSP Departmental Notices provide direction related to operations. In addition, to policies and Departmental Notices listed in the Resource Management section, above, the following policies and Departmental Notices are applicable to visitor use management at ASRA/APL:

1400	Park Operations	1100	Emergency Medical Services
0700	Pest Control	1900	Concessions and Reservations
0800	Hazardous Materials Management	2100	Real Property Acquisition and Management
1600	Facilities Maintenance		

In addition to the CFR, Reclamation directives and standards guide facility management in ASRA/APL. Applicable directives and standards include the following:

LND 01-03 and LND P14

In response to comments from fire protection organizations recommending improved radio communication infrastructure, the following change has been made to Guideline OP 3.5 on page 4-57 of the Preliminary GP/Draft RMP to clarify that Guideline OP 3.5 refers to improved radio communication infrastructure:

**Guideline OP 3.5:** Coordinate with partners to improve electronic connectivity and communications where appropriate, including improving the radio repeater system to provide better coverage in and around ASRA/APL.

In response to comments requesting greater recognition of river safety hazards, including the risks of drowning and debris in the river, new Guideline OP 3.6 is added and the following edits have been made to Goal OP 4 and Guideline OP 4.1 on page 4-57 of the Preliminary GP/Draft RMP:

**Guideline OP 3.6:** Coordinate with other agencies and organizations, including PCWA, Sierra Nevada Conservancy, Caltrans and others, to determine feasibility of removing bridge debris, either partially or entirely, from North Fork American River between the Hwy 49 Bridge and No Hands Bridge.

**GOAL OP 4:** Reduce risks to visitors from short-term or exceptional safety hazards by effectively communicating risks and safety measures in real time and through the use of interpretive signs.

**Guideline OP 4.1:** Implement an enhanced visitor safety communication program. Consider the use of social media, signage, local public service announcements and other approaches to convey risks and safety measures. This may include additional signage and other public messaging regarding the dangers of the river and risk of drowning due to: cold water, changing water levels and flows, rocks and other debris in the river, and fast turbulent water and rapids.

In response to comment O10-20 expressing concern related to funding for ASRA/APL, the following changes have been made to support maintaining funding. On page 4-58 of the GP/RMP, Guideline OP 6.4 has been removed and Goal OP 7 has been revised as follows:

~~**Guideline OP 6.4:** Reduce the funding provided by Reclamation, where appropriate.~~

**GOAL OP 7:** Increase ASRA/APL revenues, as appropriate, to offset costs of operation and maintenance and reduce the operational deficit as identified in the Managing Partner Agreement. ~~Specifically seek to reduce Reclamation's cost share and reliance on the cost share.~~

In response to comments that requested that the needs of equestrians and other trail users be considered in the design and planning of campgrounds in the Knickerbocker Management Zone, Guideline MZ 1.1 on page 4-60 of the Preliminary GP/Draft RMP has been revised to specify that trail uses would be considered in the design and development of campgrounds facilities:

**Guideline MZ 1.1:** Provide a campground in the Knickerbocker Road Corridor Activity Node with a total camping capacity equivalent up to 50 individual campsites and 3 group campsites, including alternative camping options such as cabins or yurts or other similar structures. Consider the needs of trail users, including equestrians, mountain bikers, and pedestrians when developing and designing camping facilities in the Knickerbocker Management Zone. Design and plans for these camping facilities should be cognizant of demand for those participating in trail special events at ASRA/APL and those uses within the Knickerbocker Management Zone.

In response to comments, and in making a reasoned estimate of the likelihood for camping facilities to be situated in the Foresthill Divide Management Zone, this proposed new campground has been eliminated from the Preliminary GP/Draft RMP. As a result, Figure 4.4-4 on page 4-61 in Chapter 4, The Plan, in the Preliminary GP/Draft RMP has been revised to remove the campground symbol from the Foresthill Divide Management Zone, as shown below ~~area of up to 1/4 acre.~~ In response to comments that expressed concerns about the physical condition of Knickerbocker Road or the effects of opening it to public vehicle access, Guideline MZ 3.1 on page 4-63 of the Preliminary GP/Draft RMP has been revised to clarify that physical improvements would be completed prior to opening the road to public vehicle access:

**Guideline MZ 3.1:** Provide public vehicle access to the river from Knickerbocker Road. Complete necessary physical improvements prior to opening the road to public use, such as installing fencing, vehicle barriers and gates to prevent unauthorized access; installing signs; grading and reconstructing dirt or substandard portions of road; appropriate vegetation clearing and modification along route; and developing alternate trail routes where the road serves as a primary trail route.

In response to comments that expressed concerns about the physical condition of Rocky Island Bar or the effects of opening it to public vehicle access, Guideline MZ 6.1 on page 4-68 of the Preliminary GP/Draft RMP has been revised to clarify that physical improvements would be completed prior to opening the road to public vehicle access:

**Guideline MZ 6.1:** Provide public vehicle access to the river in Rocky Point/Salt Creek Activity Node along Rocky Island Bar Road through the adjacent Knickerbocker Management Zone. Install up to 100 parking spaces and associated facilities near the river. Complete necessary physical improvements prior to opening the road to public use, such as installing fencing, vehicle barriers and gates to prevent unauthorized access; installing signs; grading and reconstructing dirt or substandard portions of road; appropriate vegetation clearing and modification along route; and developing alternate trail routes where the road serves as a primary trail route.

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In response to comments requesting fewer campsites, and based on a reasoned estimate of the camping facilities that can be sited in conjunction with day use facilities in the Rocky Point/Salt Creek Activity Node, Guideline MZ 6.2 on page 4-68 of the Preliminary GP/Draft RMP has been revised to reduce the number of allowed individual campsites from 50 to 25 and to add three group sites:

**Guideline MZ 6.2:** Provide a campground in the Rocky Point/Salt Creek Activity Node with the camping capacity equivalent of up to 2550 individual campsites and three group campsites, or the space equivalent (spacing of 1 group site = 5 individual sites), including alternative camping options such as cabins or yurts or other similar structures.

In response to comments addressing parking and access concerns in the Auburn Interface Management Zone, a new Guideline MZ 6.4 has been added to page 4-68 of the Preliminary GP/Draft RMP, as shown below:

**Guideline MZ 6.4:** Install permanent signage to direct visitor traffic away from residential streets near ASRA/APL. Deploy temporary signage to notify visitors when parking areas are full.

In response to comment I208-11 requesting additional protection measures for the roosting habitat of Townsend's big-eared bat located within Mountain Quarries Mine, Guideline MZ 11.2 on page 4-70 of the Preliminary GP/Draft RMP has been modified as follows:

**Guideline MZ 11.2:** Survey the Mountain Quarries Mine for sensitive resources including special-status bats, other sensitive biological resources, and paleontological resources, and upon developing plans to potentially open the mine to tours, consider specific protection measures to avoid and minimize impact to these resources.

Consistent with recent updates to the State CEQA Guidelines and a December 2019 decision by the Third District Court of Appeal (Citizens for Positive Growth & Preservation v. City of Sacramento) as discussed in Master Response 4, Traffic, Parking, and Access, in Chapter 3 of this Final EIR/EIS, the Draft EIR/EIS has been revised to remove the use of LOS as a CEQA significance criterion. The analysis of effects on LOS is retained for informational purposes and Mitigation Measure 4.12-7a, which addressed cumulative LOS conditions at intersection of SR 49/SR 193/Old Foresthill Road is removed from the EIR/EIS (see Chapter 4 of this Final EIR/EIS) but is added as a GP/RMP guideline, with revisions to reflect changes suggested by the California Department of Transportation in comment A4-1 as follows:

**Guideline MZ 11.4:** CSP and Reclamation will continue to work with Caltrans to resolve vehicle congestion and circulation issues at the Confluence. CSP and Reclamation will coordinate and work with Caltrans on the planning and implementation of intersection improvements for traffic operations at the intersection of SR 49/SR 193/Old Foresthill Road. The separate Caltrans' process begins when they have determined the applicable signal warrant is met which leads to the Intersection Control Evaluation (ICE) Traffic Operations Policy Directive (TOPD) #13-02 process to determine the appropriate improvements for traffic operations at an intersection.

In response to comments requesting fewer campsites, and based on a reasoned estimate of the likelihood for situating camping facilities in the Foresthill Divide Management Zone, Guideline MZ 17.2 on page 4-74 of the Preliminary/Draft RMP has been deleted to remove all proposed campsites and the associated small maintenance yard from this management zone:

**Guideline MZ 17.2:** ~~Provide a small developed campground with a capacity of up to 20 campsites. And as needed, with a small maintenance yard and equipment storage area of up to ¼ acre.~~

In response to comments requesting fewer campsites, and based on a reasoned estimate of the likelihood for situating both camping facilities and day use facilities in the Staging Area Activity Node, Guideline MZ 23.1 on page 4-82 of the Preliminary GP/Draft RMP has been revised to reduce the number of allowed individual campsites from 50 to 15 and to clarify that the new parking spaces would be in addition to those that currently exist:

**Guideline MZ 23.1:** If the OHV tracks are relocated to an upland location or otherwise eliminated, reconfigure the existing disturbed area in the Staging Area Activity Node to provide other recreation facilities including up to 1550 developed campsites, up to 50 additional day-use parking spaces, 10 shade ramadas, 20 picnic sites, restrooms, and improved river access.

In response to comments regarding the condition of Sliger Mine Road and requests for fewer campsites, and based on a reasoned estimate of the camping facilities that can be sited in the Cherokee Bar Activity Node, Goal MZ 26 and Guideline MZ 26.2 on page 4-82 of the Preliminary GP/Draft RMP have been revised as follows to reduce the maximum number of campsites in this area from 20 to 15 and to clarify that improvements to Sliger Mine Road would be implemented prior to construction of campsites:

**GOAL MZ 26:** Provide ~~excellent~~ camping opportunities on both sides of the river in the Cherokee Bar/Ruck-a-Chucky Management Zone.

**Guideline MZ 26.2:** Provide a small campground in the Cherokee Bar Activity Node, with a camping capacity equivalent of up to 1520 individual campsites and one group site, outside the floodplain. Coordinate with El Dorado County affected agencies to improve Sliger Mine Road ~~in~~ prior to, ~~or at the same time as,~~ the development of the campground. ~~is developed.~~

To clarify that improvements to McKeon-Ponderosa Road would be implemented before the road is open to public vehicle access, Guideline MZ 27.1 on page 4-90 of the Preliminary GP/Draft RMP has been revised as follows:

**Guideline MZ 27.1:** Improve the McKeon-Ponderosa Road and open the road for public vehicle access to provide enhanced access to the river. Complete necessary physical improvements prior to opening the road to public use, such as installing fencing, vehicle barriers, signs, and gates to prevent unauthorized access; grading and reconstructing dirt or substandard portions of the road; and developing alternate trail routes where the road serves as a primary trail route. Coordinate with fire agencies to receive input on adequate design for emergency vehicle access.