

3 Comments and Responses

This chapter contains comment letters received during the public review period for the Draft EIR/EIS, which extended from July 19, 2019 through September 17, 2019, including transcribed comments received during a public open house held on August 15, 2019 at the Northside Elementary School in Cool, California. Written comments submitted after the close of the public review period but before preparation of this Final EIR/EIS are also included.

Comments and responses to comments in this chapter of the Final EIR/EIS are arranged into the following categories:

- ◆ Agencies – federal, state, and local public agencies;
- ◆ Organizations – formal groups or organizations;
- ◆ Individuals – private citizen not representing an organization;
- ◆ Open House – written comments provided at the August 15, 2019 public open house;
- ◆ Open House Form Letters – identical letters submitted at the open house with multiple signatories; and
- ◆ Form Letters – identical letters submitted by multiple parties.

Each letter and each comment within a letter have been given an identification number. Responses are numbered so that they correspond to the associated comment. Where appropriate, responses are cross-referenced between letters or to a master response. Master responses are provided for topics that are raised by multiple commenters and/or would benefit from a more comprehensive or integrated response than would be provided to address a single comment.

Some of the comments received on the Draft EIR/EIS do not address environmental issues or the adequacy of the Draft EIR/EIS and instead pose questions, offer suggested changes, or express support for or opposition to the Preliminary GP/Draft RMP. Where feasible, this Final EIR/EIS answers questions and directs those comments to relevant information in the Preliminary GP/Draft RMP or EIR/EIS. However, this Final EIR/EIS does not provide detailed responses to comments that do not relate to the adequacy of the document or the environmental analysis; rather, the suggestions and recommendations are included in this Final EIR/EIS, which will be considered by the U.S. Bureau of Reclamation (Reclamation) and California State Parks (CSP) in their decision-making processes regarding the GP/RMP.

In conformance with Section 15088(a) of the State CEQA Guidelines and NEPA requirements (40 CFR 1503.4), written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR/EIS. NEPA regulations under 40 CFR 1503.4(b) addresses the inclusion of comment letters in a Final EIS where:

"All substantive comments received on the draft statement (or summaries thereof where the response has been exceptionally voluminous), should be attached to the final statement whether or not the comment is thought to merit individual discussion by the agency in the text of the statement."

The comments were considered voluminous in this case, but rather than supply a summary of the comment, the comment itself was included followed by a response.

3.1 List of Commenters on the Draft EIR/EIS

Table 3-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter. The actual comment letters are not attached to the Final EIR/EIS, because in all but a few instances comments are repeated verbatim in the body of this document.

Table 3-1 List of Commenters		
Letter No.	Commenter	Date
AGENCIES (A)		
A1	El Dorado County Planning and Building Department Anne Novotny, Deputy Director of Planning	August 8, 2019
A2	Foresthill Fire Protection District John Michelini, Board President	August 15, 2019
A3	United States Environmental Protection Agency Cornell Dunning, Acting Manager Environmental Review Branch	August 30, 2019
A4	Cal Trans Department of Transportation, District 3 Kevin Yount, Branch Chief Office of Transportation Planning Regional Planning Branch - East	September 3, 2019
A5	El Dorado County Board of Supervisors Sue Novasel, Chair	September 10, 2019
A6	Georgetown Divide Public Utility District Steven Palmer, General Manager	September 10, 2019
A7	City of Auburn Robert Richardson, City Manager	September 10, 2019
A8	Placer County Fire Department Brian Estes, Fire Chief	September 11, 2019
A9	CAL FIRE – Nevada Yuba Placer Unit Brian Estes, Fire Chief	September 11, 2019
A10	El Dorado County Fire Protection District Lloyd Ogan, Fire Chief	September 12, 2019
A11	CAL FIRE – Amador El Dorado Unit Scott Lindgren, Unit Chief	September 16, 2019
A12	Placer County Water Agency Benjamin Ransom, Senior Environmental Scientist	September 16, 2019
A13	South Placer Fire District Eric G. Walder, Fire Chief	September 17, 2019
A14	El Dorado County, Chief Administrative Office, Parks Division Vickie Sanders, Parks Manager	September 17, 2019
A15	California Department of Fish and Wildlife Gabriele Quillman	September 19, 2019
A16	County of El Dorado, Department of Transportation Harsimran K Bains, Transportation Planner	August 22, 2019
ORGANIZATIONS (O)		
O1	Backcountry Hunters and Anglers Justin Bubenik, Chair	August 15, 2019

Letter No.	Commenter	Date
O2	River Dippers Susan S. Conforti, Coordinator	August 20, 2019
O3	Trailhead Estates Owners' Association Liz Williams, President	August 29, 2019
O4	Folsom Auburn Trail Riders Action Coalition Matt Wetter, President	September 16, 2019
O5	United Auburn Indian Community Gene Whitehouse, Chairman	September 16, 2019
O6	Endurance Capital Committee Phil Sayre, Member	September 16, 2019
O7	Greater Auburn Area Fire Safe Council Kevin Hanley, Chairman	September 16, 2019
O8	Auburn Lake Trails Board of Directors Laurie Page, President	September 17, 2019
O9	Friends of the North Fork (American River) and Placer County Tomorrow Michael Garabedian, President and Co-founder	September 17, 2019
O10	Protect American River Canyons Timothy S. Woodall, Board Chairman and Eric Peach, Conservation Chair	September 17, 2019
O11	Greater Lincoln Fire Safe Council George Alves, Chair	September 17, 2019
O12	Divide Action Coalition Lorna Dobrovoly, Chair	September 17, 2019
O13	Divide Action Coalition	October 28, 2019
O14	Divide Action Coalition Lorna Dobrovoly	November 8, 2019
O15	Western States Trail Foundation Tony Benedetti, President	September 18, 2019
INDIVIDUALS (I)		
I1	Rachel Debecker	July 21, 2019
I2	Janice Nelson Stevens	July 22, 2019
I3	Becca Foles	July 24, 2019
I4	Donna Hughes	July 24, 2019
I5	Rick Wolfe	July 25, 2019
I6	Sheila Larson	July 30, 2019
I7	Lorna Dobrovoly	August 1, 2019
I8	Chris Fenton	August 7, 2019
I9	Linnea Marengo	August 8, 2019
I10	Gary Ransom	August 8, 2019
I11	S. Cordingley	August 8, 2019
I12	Lorna Dobrovoly	August 12, 2019
I13	Valeria McKay	August 12, 2019
I14	Paula Bertoncin	August 15, 2019

Letter No.	Commenter	Date
I15	Jim Holbrook	August 15, 2019
I16	David Beecroft	August 16, 2019
I17	Jon Brommeland	August 16, 2019
I18	Brian Burger	August 16, 2019
I19	Josh Harbulak	August 16, 2019
I20	Dennis Keller	August 16, 2019
I21	Leslie Macdonald	August 16, 2019
I22	Peter Madams	August 16, 2019
I23	Valeria McKay	August 16, 2019
I24	Elliot Naess	August 16, 2019
I25	Sheila Toner	August 16, 2019
I26	Tim Mullins	August 16, 2019
I27	William Yochum	August 16, 2019
I28	Deborah Accomazzo	August 17, 2019
I29	Janice and Bob Allen	August 17, 2019
I30	Dianna Babb	August 17, 2019
I31	Timothy Creed	August 17, 2019
I32	David Davis	August 17, 2019
I33	Elizabeth Wilson Hickman	August 17, 2019
I34	Danielle Jacques	August 17, 2019
I35	Dennis Larson	August 17, 2019
I36	Melina Naye	August 17, 2019
I37	David Buck	August 18, 2019
I38	David Castell	August 18, 2019
I39	David Odom	August 20, 2019
I40	Peggy Egli	August 21, 2019
I41	Kirsten Garrard	August 21, 2019
I42	Bev Martin	August 21, 2019
I43	Carolyn O'Connor	August 21, 2019
I44	Jennifer Ward	August 22, 2019
I45	Bruce Bowman	August 24, 2019
I46	Robin Chapman	August 25, 2019
I47	Susan Yewell	August 26, 2019
I48	Dave Fujiyama	August 27, 2019
I49	Rhonda Labernk	August 27, 2019
I50	Denise Pickering	August 27, 2019
I51	Electra Yeager	August 27, 2019
I52	Mike Vandeman	August 27, 2019

Letter No.	Commenter	Date
153	Annette and Frank Arnall	August 28, 2019
154	Don and Kathy Custard	August 28, 2019
155	Glenn Getscher	August 28, 2019
156	Fritz Lapenson	August 28, 2019
157	Randy Kirkbride	August 28, 2019
158	Ron and Teri Nies	August 28, 2019
159	Stacie Sherman	August 28, 2019
160	Haley Toth	August 28, 2019
161	Jerry and Sandra Reeves	August 28, 2019
162	Jakendeb	August 29, 2019
163	Robert Boyer	August 29, 2019
164	Howard Fitzhugh	August 29, 2019
165	Joline Clark and Jodie Crane	August 29, 2019
166	John and Heidi Rietjens	August 29, 2019
167	Roy Bigge	August 30, 2019
168	Margi Dunlap	August 30, 2019
169	Pamela Greer	August 30, 2019
170	Alan Hersh	August 30, 2019
171	Tim Palmer	August 30, 2019
172	William M. Wauters	August 2019
173	June Blue	August 2019
174	Linda Cholcher	September 1, 2019
175	Hal and Ann Hall	September 2, 2019
176	Sue Kitt	September 2, 2019
177	Laurie Sweeney	September 2, 2019
178	Tedzo Smith	September 2, 2019
179	Diane Dixon-Johnson	September 3, 2019
180	Donna Hutcheson	September 3, 2019
181	Charlotte Miller	September 3, 2019
182	Mark Engemann	September 4, 2019
183	Diane Cornwall	September 6, 2019
184	Joan Crane	September 6, 2019
185	Peggy Depue	September 6, 2019
186	Peter Rau	September 6, 2019
187	Dana Bilello-Barrow	September 7, 2019
188	Dallas and Marlene Green	September 7, 2019
189	Rodger March	September 7, 2019
190	Jeryn Blanchar	September 7, 2019

Letter No.	Commenter	Date
I91	Laura Margraf	September 8, 2019
I92	Rob and Cindy Zitta	September 8, 2019
I93	Colleen Morrissey	September 9, 2019
I94	Claudia Cinelli	September 9, 2019
I95	April Ashmore	September 9, 2019
I96	Doug and Karin Brown	September 9, 2019
I97	Laurie McGonagill	September 9, 2019
I98	Jenny Barrett	September 10, 2019
I99	Sidney Stoffels	September 10, 2019
I100	Palma Lindsay	September 10, 2019
I101	Solange Nadeau	September 10, 2019
I102	Andy Zdon	September 10, 2019
I103	Valerie Akana	September 11, 2019
I104	Justin Earwood	September 11, 2019
I105	Stephan Howder	September 11, 2019
I106	Mitch MacDonald	September 11, 2019
I107	Lon Milka	September 11, 2019
I108	Jessica Olejnik	September 11, 2019
I019	Eileen Parr	September 11, 2019
I110	Brian Weatherill	September 11, 2019
I111	Jim and Kathy Young	September 11, 2019
I112	Drew Buell	September 12, 2019
I113	Charlotte G. Donnan	September 12, 2019
I114	Dawn Elliott	September 12, 2019
I115	Lanie Gerber	September 12, 2019
I116	Roberta Grout	September 12, 2019
I117	Joe Kleinsmith	September 12, 2019
I118	Steve Miller	September 12, 2019
I119	Dave Wolf and Katherine Berkman	September 12, 2019
I120	Janie Johnston	September 12, 2019
I121	Charlene Rossignol	September 12, 2019
I122	Janet Peters	September 12, 2019
I123	Kevin Doyle	September 13, 2019
I124	Mark Perry	September 13, 2019
I125	Bernie and Lynette Masztakowski	September 13, 2019
I126	Karina Pitts	September 13, 2019
I127	Glenda Miller	September 13, 2019
I128	Shannon Gunnison	September 13, 2019

Letter No.	Commenter	Date
I129	Laurie Page	September 13, 2019
I130	Julie Campbell	September 13, 2019
I131	Elisa Wyatt	September 13, 2019
I132	Cynthia Sarmiento	September 13, 2019
I133	Lucinda Elliot	September 13, 2019
I134	Brian Wolverton	September 13, 2019
I135	Gary and Carol Farnworth	September 13, 2019
I136	Lance Bartczak	September 13, 2019
I137	Susan Earwood	September 13, 2019
I138	Maria DeCarlo and Curtis Owen	September 13, 2019
I139	Phyllis Polito	September 13, 2019
I140	Phil and Sally Dyck	September 14, 2019
I141	Jeff W. Davidson	September 14, 2019
I142	Dwight and Patricia Rickard	September 14, 2019
I143	Audrey Veirs	September 14, 2019
I144	Doris Gorin	September 14, 2019
I145	Steve Hiatt	September 14, 2019
I146	Bobbie Baron	September 14, 2019
I147	Carter Redding	September 14, 2019
I148	Melody Cassen	September 14, 2019
I149	Steve and Jodi Bodick	September 14, 2019
I150	Cody Pruden	September 14, 2019
I151	Lynne Reuss	September 14, 2019
I152	Leslie Graves	September 14, 2019
I153	Gary Estes	September 15, 2019
I154	Shana and Mark McDonald	September 15, 2019
I155	Mary Ann and Christopher Collins	September 15, 2019
I156	Elizabeth A. Jensen	September 15, 2019
I157	Richard McClure	September 15, 2019
I158	Vicki Ramsey	September 15, 2019
I159	DCHH	September 15, 2019
I160	Tom Barrett	September 15, 2019
I161	Craig Stotenburg	September 15, 2019
I162	Shannon Weil	September 15, 2019
I163	Lorna Dobrovolny	September 15, 2019
I164	Bill and Kathe Beadle	September 16, 2019
I165	Julie Cody	September 16, 2019
I166	Curt and Jane Wurst	September 16, 2019

Letter No.	Commenter	Date
I167	Cathy Haagen-Smit	September 16, 2019
I168	Pam Banks	September 16, 2019
I169	Lisa Cordy	September 16, 2019
I170	Donald Dunkley	September 16, 2019
I171	Jackie House	September 16, 2019
I172	Shannamar Dewey	September 16, 2019
I173	Paige Palomo	September 16, 2019
I174	John M. Donovan	September 16, 2019
I175	Jessa Rego	September 16, 2019
I176	Barton Ruud	September 16, 2019
I177	Tony Crawford	September 16, 2019
I178	Robyn Pask	September 16, 2019
I179	Beverly Hobbes	September 16, 2019
I180	Kathleen McCarl	September 16, 2019
I181	Pam and Chad Cook	September 16, 2019
I182	Gigi Peeler	September 16, 2019
I183	Jill Schnetz	September 16, 2019
I184	Curt Kruger	September 16, 2019
I185	Steven Serkanic	September 17, 2019
I186	Aaron Rough	September 17, 2019
I187	Kyle Pogue	September 17, 2019
I188	Lisa Parsons	September 17, 2019
I189	Patricia Graybill	September 17, 2019
I190	Jean Zabriskie	September 17, 2019
I191	Shannon Pogue	September 17, 2019
I192	Colleen Malone	September 17, 2019
I193	Indira McDonald	September 17, 2019
I194	Larson Family	September 17, 2019
I195	Joy and Mike Gephart	September 17, 2019
I196	Timothy Sheil	September 17, 2019
I197	Stephanie Buss	September 17, 2019
I198	Rebecca Almeida	September 17, 2019
I199	George Almeida	September 17, 2019
I200	Penny Humphreys	September 17, 2019
I201	Justin Pal	September 17, 2019
I202	Sue and Bob Vargas	September 17, 2019
I203	Michelle Pearson	September 17, 2019
I204	David Shincovich	September 17, 2019

Letter No.	Commenter	Date
I205	Jeanine Stiles	September 17, 2019
I206	Margo Seabourn	September 17, 2019
I207	Mary Kaye Hession	September 17, 2019
I208	Sheila Steen Larsen	September 17, 2019
I209	Barbara White	September 17, 2019
I210	Elizabeth Foss	September 17, 2019
I211	Shawn Dunkley	September 17, 2019
I212	Season Eckardt	September 17, 2019
I213	Donna Williams	September 17, 2019
I214	Suzanne Ferrera	September 17, 2019
I215	Henriette Brunn	September 17, 2019
I216	Scott Eckardt	September 17, 2019
I217	Christy Bowles	September 17, 2019
I218	Stephanie Hensey	September 17, 2019
I219	Rick Ferrera	September 17, 2019
I220	Lynn MacDonald	September 17, 2019
I221	Ray Bryars	September 17, 2019
I222	Maureen Henderson	September 17, 2019
I223	Ginger Gallup and Brandon Lewis	September 17, 2019
I224	Pamela Swartz	September 17, 2019
I225	Kandace Kost-Herbert and James Herbert, Jr.	September 17, 2019
I226	James G. and Jean Piette	September 17, 2019
I227	Tony Mindling	September 17, 2019
I228	Leslie DeMay	September 17, 2019
I229	Joanne Thornton	September 17, 2019
I230	Becky Morris and Rex Maynard	September 17, 2019
I231	Pam Sheil	September 17, 2019
I232	Shirley Hess-Waltz	September 17, 2019
I233	Lynne Reuss	September 20, 2019
I234	Sharma Gaponoff	September 18, 2019
I235	Michael Garabedian	September 18, 2019
I236	Hetty Dutra	September 18, 2019
I237	Kevin Hanley	September 18, 2019
I238	Wes Fain	September 18, 2019
I239	Karen Hayden	September 18, 2019
I240	Caitlin Grossman	September 18, 2019
I241	Lori Stewart	September 18, 2019
I242	Marika Cates	September 18, 2019

Letter No.	Commenter	Date
I243	Leslie Bisharat	September 18, 2019
I244	Joanna Amanda Colt	September 19, 2019
I245	Erin McDonald	September 19, 2019
I246	Cali Jensen	September 20, 2019
I247	Dianne Dixon Johnson	September 25, 2019
I248	Laurie Sweeney	September 26, 2019
I249	Mark Perry	October 29, 2019
I250	Lara Semenoff	November 25, 2019
I251	Tom Cooper	September 6, 2019
I252	Betty Blankenship	September 6, 2019
I253	Meghan Laws	September 6, 2019
I254	Margaret Toralti	September 8, 2019
I255	Mark Longpre	November 25, 2019
I256	Foresthill Resident	No date
OPEN HOUSE (OH)		
OH1	No Name	August 15, 2019
OH2	Mary Gorden	August 15, 2019
OH3	Austin Patty	August 15, 2019
OH4	Bonnie Grimm	August 15, 2019
OH5	Richard Grimm	August 15, 2019
OH6	William Kirby	August 15, 2019
OH7	Dorothy Rohrer	August 15, 2019
OH8	Biff Brethour	August 15, 2019
OH9	No Name	August 15, 2019
OH10	Linnea Marengo	August 15, 2019
OH11	Maureen Wilson	August 15, 2019
OH12	Carol Timonerman	August 15, 2019
OH13	Dave Fujiyama	August 15, 2019
OH14	Chris and Michele Turney	August 15, 2019
OH15	Margi Dunlop	August 15, 2019
OH16	Jerome Prideaux	August 15, 2019
OH17	Linda Prideaux	August 15, 2019
OH18	Margo Glendenning	August 15, 2019
OH19	Ann Yoshimura	August 15, 2019
OH20	Monte Kruger	August 15, 2019
OH21	Steve Sheldon	August 15, 2019
OH22	Jaci Crowley	August 15, 2019
OH23	Laura Odabashian	August 15, 2019

Letter No.	Commenter	Date
OH24	Pam Asai	August 15, 2019
OH25	Denise Sand	August 15, 2019
OH26	Susan Wirgler	August 15, 2019
OH27	Peggy Christensen	August 15, 2019
OH28	Christine McCaleb	August 15, 2019
OH29	Becky Morris	August 15, 2019
OH30	Bill Ray	August 15, 2019
OH31	Kathleen Ray	August 15, 2019
OH32	Roger Grogham	August 15, 2019
OH33	Gail Maduri	August 15, 2019
OH34	Catherine Godwin	August 15, 2019
OH35	Patrick Godwin	August 15, 2019
OH36	Wendy Lumbert	August 15, 2019
OH37	Donna Seaman	August 15, 2019
OH38	Jan Dunn	August 15, 2019
OH39	Curtis Kruger	August 15, 2019
OH40	Debbie Delisle	August 15, 2019
OH41	Delna Ramirez	August 15, 2019
OH42	Janet Kampf Weldy	August 15, 2019
OH43	Chris Weldy	August 15, 2019
OH44	Sheila Toner	August 15, 2019
OH45	No Name	August 15, 2019
OH46	Carolyn Loomis	August 15, 2019
OH47	Frank Robertson	August 15, 2019
OH48	Russel T. Sevfert	August 15, 2019
OH49	Bill McClusleey	August 15, 2019
OH50	Raymond and Marlene Lenz	August 15, 2019
OH51	Andrew C. Brost	August 15, 2019
OH52	Frances Todd	August 15, 2019
OH53	Mae Harms	August 15, 2019
OH54	Denise Dixon-Janna	August 15, 2019
OH55	Connie Giuliano	August 15, 2019
OH56	No Name	August 15, 2019
OH57	Jon Brown	August 15, 2019
OH58	Denise Sand	August 15, 2019
OH59	Jon and Mary Brommeland	August 15, 2019
OH60	Nancy and Eileen Gordon-Hagman	August 15, 2019
OH61	Diana vande Berg	August 15, 2019

Letter No.	Commenter	Date
OH62	William and Carol Forsythe	August 15, 2019
OH63	Henry Higham	August 15, 2019
OH64	William Faulkner	August 15, 2019
OH65	Sarah Saunders	August 15, 2019
OH66	Kathy Kelleher	August 15, 2019
OH67	Michael Kelleher	August 15, 2019
OH68	Gary Murray	August 15, 2019
OH69	Susan Murray	August 15, 2019
OH70	April Roberts	August 15, 2019
OH71	Steve Lamb	August 15, 2019
OH72	Georgia Anderson	August 15, 2019
OH73	Janell Cornforth	August 15, 2019
OH74	Lynette	August 15, 2019
OH75	Frank	August 15, 2019
OH76	Ann Gualtieri	August 15, 2019
OH77	Steve Todd	August 15, 2019
OPEN HOUSE FORM LETTERS (OH FL)		
OH FL I	Aeber Marrapodi	August 15, 2019
	Aloha Adams	
	Ann Yoshimura	
	Anne Bohn Edwards	
	Anne E. Cole	
	April Roberts	
	Ava L. Elkow	
	Barbara Lukianoff	
	Barbara P. Edison	
	Beverly A. Hobbs	
	Beverly A. Martin	
	Bill Ray	
	Carol Costa	
	Carol Ferrari	
	Carolyn Loomis	
	Casey Javer	
	Charlene Rossignol	
	Charlotte Donnar	
	Cindy Hetchner	
	Cynthia A. Garcia	
	Dave Fujiyama	

Letter No.	Commenter	Date
	Dawn Elliott	
	Debbie L. Tory	
	Denise E. Sand	
	Denise Pickering	
	Diana Giroux	
	Don Graham	
	Doni DeBolt	
	Donna Seaman	
	Dwight Rickard	
	Electra E. Yeager	
	Elisa Wyatt	
	Elizabeth Honeycutt	
	Emily Wyatt	
	Eric Enes	
	Erin McChesney	
	Eugene Wise	
	Frank Robertson	
	Gigi Peeler	
	Greg Wyatt	
	Heidi Zacher	
	Hope Justice	
	Isie Klamann	
	Jack Hession	
	Jacqueline Lee Jolly	
	James Warren	
	Jamie Hoffman	
	Janet Peters	
	Janice E. Myers	
	Jean Zabriskie	
	Jeanine Stiles	
	Jeannie Masterman	
	Joline Clark	
	Julie A. Cody	
	Julie Cody	
	Kacia Richins	
	Kalena Beam	
	Karen Hodge	
	Kathleen Ray	

Letter No.	Commenter	Date
	Kathy Kelleher	
	Kevin Odell	
	Kristine Lintt	
	Kristopher Jower	
	Laura Graham	
	Laura Odabashian	
	Leslie C. DeMay	
	Leslie Jacobs	
	Linda and Michael Jatt	
	Linnea Marengo	
	Lori Bernardo	
	Lucinda J. Warren	
	Lyndell J. Virgil Jr	
	Lynne Reuss	
	Margi Dunlap	
	Margretta Dahms	
	Mark Olejnik	
	Mark Olyjink	
	Megean Martin	
	Michael Hess	
	Michael K. Elliot	
	Michele Turney	
	Michelle Galdal	
	Michelle Peerson	
	Monte Kruger	
	Otto Galdal	
	Pamela Greer	
	Patricia A. Boyntom	
	Patricia Rickard	
	Patricia Tompkins	
	Paul Dahms	
	Peggy Depue	
	Plumer Peeler	
	Rachel A. Schindler	
	Rita S. Mason	
	Robyn Pask	
	Russel T. Seufert	
	Sally DePietro	

Letter No.	Commenter	Date
	Sarah Biasotti	
	Shannon Weil	
	Sherry Prince	
	Shirley A. Jones	
	Shirley Wise	
	Sonja Conklin	
	Stacy Mecklenburg	
	Steve Lamb	
	Steven A. Elkow	
	Susan M. Conners	
	Susan Murray	
	Susan Yewell	
	Tamara Woods	
	Theresa Witcher	
	Tony Larich	
	Tracy Browne	
	Tyler Prince	
	Valerie McKay	
	Victor E. Hodge	
	Virginia Hess	
	Wendi Milka	
	William A. Sidney Jr	
	William Yoshimura	
OH FL 2	Alberta M. Niegel	August 15, 2019
	Aloha Adams	
	Ann Yoshimura	
	Anne Bohn Edwards	
	April Roberts	
	Austin Petty	
	Ava L. Elkow	
	Barbara Lukianoff	
	Barbara P. Edison	
	Beverley A. Martin	
	Beverly A. Hobbs	
	Biff Brethola	
	Bill Ray	
	Bob Hart	
	Brenda Morazzini	

Letter No.	Commenter	Date
	Bruce Bowman	
	Carol Costa	
	Carol Ferrari	
	Carolyn Loomis	
	Casey Jower	
	Charlene Rossignol	
	Chris Weldy	
	Cindy Hetchner	
	Cindy Twyman	
	Cynthia A. Garcia	
	Don Graham	
	Daniel Sciortino	
	Dave Fujiyama	
	David Parr	
	Deb Peter	
	Debbie DeLisle	
	Delna Ramirez	
	Denise E. Sand	
	Denise Pickering	
	Diana Giroux	
	Doni DeBolt	
	Donna Seaman	
	Dwight Rickard	
	E. Janell Cornforth	
	Eileen M. Parr	
	Electra E. Yeager	
	Elisa Wyatt	
	Elizabeth Honeycutt	
	Emily Wyatt	
	Eric Enes	
	Erin McChesney	
	Eugene Wise	
	Frank Robertson	
	Gary Murray	
	George L. DeMay	
	Gigi Peeler	
	Greg Wyatt	
	Isie Klamman	

Letter No.	Commenter	Date
	Jaci Crowley	
	Jack and Sandy Klingler	
	Jacqueline Lee Jolly	
	James Warren	
	Janet Kampf Weldy	
	Janet Peters	
	Janet S. Weaver	
	Janice Myers	
	Jean Zabriskie	
	Jeanine Stiles	
	Jeannie Masterman	
	Jennifer Erwin	
	Joanne Thornton	
	Joline Clark	
	Joyce Halpin	
	Julia Cody	
	Kacia Richins	
	Kalena Beam	
	Kathleen Ray	
	Kathy Kelleher	
	Kevin Odell	
	Kristine Lintt	
	Kristopher Jower	
	Lanie Gerber	
	Laura Graham	
	Laura Odabashian	
	Leslie Jacob	
	Linda and Michael Jatt	
	Linda L. Hurd	
	Linnea Marengo	
	Lori Bernardo	
	Lucinda J. Warren	
	Lyndell J. Virgil Jr	
	Lynelle Robertson	
	Lynne Reuss	
	Marci Hughes	
	Margretta Dahms	
	Marguerite Seabourn	

Letter No.	Commenter	Date
	Mark Twyman	
	Marlene Lenz	
	Mary Gorden	
	Mary Kaye Hession	
	Megean Martin	
	Michael Hess	
	Michelle Peerson	
	Monte Kruger	
	Nanette Franceschini	
	Paige K. Palombo	
	Pamela Greer	
	Pati A. Hart	
	Patricia A. Boynton	
	Patricia B. Eregner	
	Patricia Rickard	
	Patricia Tompkins	
	Peter Moakley	
	Plumer Peeler	
	Rachel A. Schindle	
	Raymond Lenz	
	Rita S. Mason	
	Robert Gerber	
	Robert W. Kiseleff	
	Robyn Pask	
	Russel T. Seufert	
	Sally DePietro	
	Sarah Biasotti	
	Sharon Sciortino	
	Sheila Toner	
	Sherry Prince	
	Shirley A. Jones	
	Shirley Wise	
	Sonja Conklin	
	Steve Lamb	
	Steven A. Elkow	
	Susan Yewell	
	Tamara Woods	
	Theresa Witcher	

Letter No.	Commenter	Date
	Tracy Browne	
	Valerie McKay	
	Virginia Hess	
	William A. Sidney Jr	
	William Yoshimura	
FORM LETTERS (FL)		
FLI	Linnea Marengo	September 17, 2019
	Alan and Delayn Chaurin	
	Albert Brethour	
	Aloha N. Adams	
	Ann Thompson Yoshimura	
	Ashley Minhler	
	Barbara Kennedy	
	Barbara Marshall	
	Benno Kiesel	
	Bernard Wilson	
	Bill Johnson	
	Bill McClushy	
	Bobby Eisenberg	
	Brian G. Pickens	
	Casey Jower	
	Charlene Conley	
	Charles A. Noe	
	Chris Barnes	
	Connie Giuhano	
	Craig Bailey	
	Daisy Eisenberg	
	David Parr	
	David Seeber	
	Deborah Baird West	
	Dianne Wright	
	Donna Babuska	
	Elisa Wyatt	
	Frances Todd	
	Gerald Grismore	
	Glenn Stier	
	Greg Wyatt	
	Henry Highman	

Letter No.	Commenter	Date
	Howard Kusters	
	Irene Seeber	
	Jackie Coffey	
	Jacob B.L. Scott	
	James D. Miller	
	Janet L. McLaughlin	
	Jean E. Winfrete	
	Jean Kusters	
	Jean W. Kusters	
	Jeanine M. Eley	
	Jeanine Stiles	
	Jeffrey Pyle	
	Jeralyn Irby	
	Joanne Thornton	
	John Leaird	
	John M. Jimenez	
	John Schwartzler	
	Judith E. Force	
	Julia Pruden	
	Julie M. Pickens	
	Justin Earwood	
	Kathleen Leaird	
	Kathryn Mangelsen	
	Kevin Doyle	
	Korina Genesha	
	Kris Jower	
	Kristine Lintt	
	Lewis Nason	
	Lillie Peters	
	Margaret M. Jimenez	
	Margie Correa	
	Margo Glendenning	
	Mary Boch-Nipar	
	Maureen Kiesel	
	Maureen Mulcahy	
	Michael Aplanalp	
	Michael McIntyre	
	Michael P. McLaughlin	

Letter No.	Commenter	Date
	Michael Rapposelli	
	Mike Castro	
	Mike Katoha	
	Name Unknown (1)	
	Name Unknown (2)	
	Name Unknown (3)	
	Nora Gerhardy	
	Patrick Leonard	
	Paul Correa	
	Paula Van de Berg	
	Peggy Booker	
	Peter Babuska	
	Phillip Hill	
	Rachelle Hobbs	
	Renee Castro	
	Robert D. Lamberton	
	Roxanne Brethour	
	Shannon Weil	
	Sheila Maxwell	
	Sherry Hamre	
	Sorren Christensen	
	Stacy Nalepa and Anthony Salvino	
	Steve DePue	
	Steven C. Todd	
	Trina Burton	
	Valerie Cunningham	
	Valerie Rose	
	Vince Genesta	
	William A. Borden Jr	
	William B. Hamre	
	William Faulkner	
	Yvonne Leuald-Vasquez	
FL 2	Protect American River Canyons	September 15, 2019
	Andrea Rosenthal	
	Anthony DeRiggi	
	Bob Gilliom	
	Michael Anderson	
	Michael Hammett	

Letter No.	Commenter	Date
	Richard Warren	

3.2 Master Responses

When multiple comments raise similar environmental issues, rather than only responding individually, master responses have been developed to address the issues in an integrated and comprehensive manner. Master responses are provided for the following topics: purpose of the Preliminary GP/Draft RMP, public engagement, wildfire risk, and traffic. A cross-reference to the master response is provided, when relevant, in addressing individual comments provided on the Draft EIR/EIS.

3.2.1 Master Response 1: Purpose of the General Plan/Resource Management Plan

Introduction

Multiple comments on the GP/RMP and Draft EIR/EIS questioned the need for a GP/RMP or suggested that the existing Interim Resource Management Plan (IRMP) completed in 1992 remain in place. Many comments expressed concern that implementation of the GP/RMP would attract additional visitors and potential adverse impacts would occur associated with additional visitation and new facilities. Some comments indicated that adoption of the Preliminary GP/Draft RMP would result in the imminent construction of new or expanded facilities. Other comments expressed the desire for more information or public input regarding the future development of new or expanded facilities envisioned in the Preliminary GP/Draft RMP. A number of comments also expressed the sentiment that ASRA/APL should be managed for local residents and not accommodate or attract visitors from other parts of the state or region.

ASRA/APL is a statewide resource (i.e., a State Recreation Area [SRA]) that is consistent with the definition of SRAs in Public Resource Code (PRC) Section 5019.56(a),

State recreation areas, consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs. The areas shall be selected for their having terrain capable of withstanding extensive human impact and for their proximity to large population centers, major routes of travel, or proven recreational resources such as manmade or natural bodies of water.

ASRA/APL is an SRA, which provides multiple recreational opportunities for the citizens of California and the United States. As described in PRC Section 5019.56(a), ASRA/APL is not intended to meet purely local recreation needs. Thus, ASRA/APL is a public resource, which should not be managed strictly for local residents.

The GP/RMP would serve as a broad planning and policy document that guides long-term management of ASRA/APL through definition of goals and guidelines to provide high-quality outdoor recreation opportunities to visitors, while protecting natural and cultural resources and maintaining public safety. While ASRA/APL should not be managed strictly for local residents, most visitors to ASRA/APL do come from local communities and the broader Sacramento region. The demand for visitation at ASRA/APL is heavily influenced by the population of the communities where visitors originate. As a result, demand for

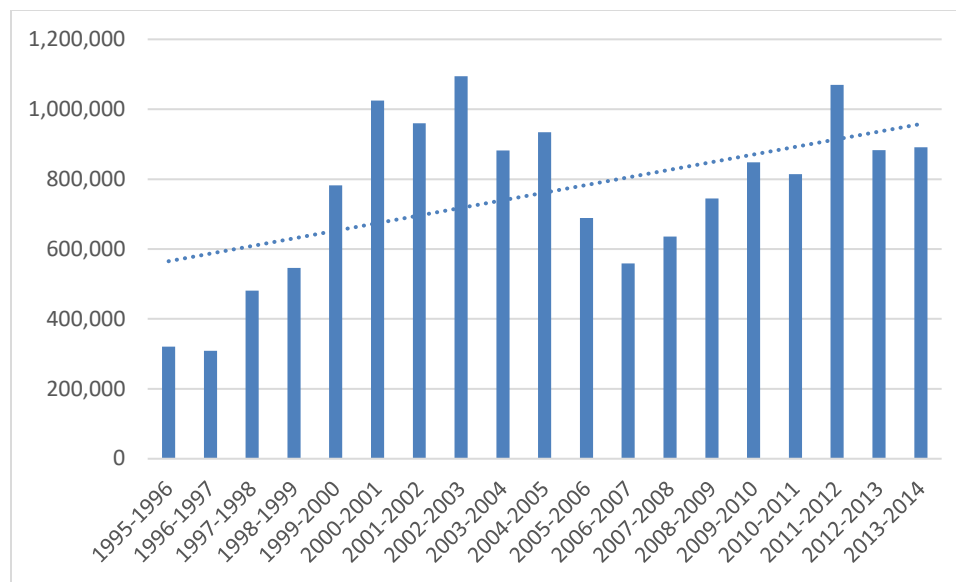
recreation and visitation at ASRA/APL have steadily increased in tandem with local and regional population growth. Visitation demand at ASRA/APL is projected to continue to increase in the future because of the forecasted continued growth in the local and regional population. The Preliminary GP/Draft RMP has been developed to anticipate and manage that increased visitation, while protecting natural and cultural resources, maintaining public safety, and providing high-quality recreation opportunities consistent with the goals and guidelines in the GP/RMP and the purpose and vision of ASRA/APL (see Section 4.1, Purpose and Vision, in Chapter 4 of the Preliminary GP/Draft RMP).

The goals and guidelines of the Preliminary GP/Draft RMP are designed to anticipate and manage the increasing local and regional population-driven recreation demands in the SRA. At the same time, the Preliminary GP/Draft RMP seeks to avoid generating substantial new visitation by not adding new facilities that would be attractions on their own. The Preliminary GP/Draft RMP identifies the maximum number, type, and general location of facilities that could be developed in the future, but does not by itself authorize facility development. The exact design, footprint, number, and type of new or expanded facilities would be developed later through site-specific facility planning in response to demonstrated need over buildout of the Preliminary GP/Draft RMP, including the requisite environmental review. Development and implementation of future individual projects would also be influenced by factors such as available funding and staffing levels.

The Relationship Between Population and Visitation

As described under “Purpose and Need” in the “Executive Summary” chapter of the Draft EIR/EIS, one of the purposes of the GP/RMP is to reconcile the need for access to recreation areas with the protection of natural and cultural resource values while responding to current conditions and issues. This includes responding to increases in the number of visitors to ASRA/APL, which have, and are projected to continue to, increase as a result of local, regional, and state population growth.

Figure 3-1, below, shows the recorded visitation from the 1995-1996 through 2013-2014 fiscal years. During this time period, visitation has grown from approximately 300,000 recorded visitors in the 1995-1996 fiscal year to approximately 890,000 recorded visitors in the 2013-2014 fiscal year and an increasing trend in visitation is apparent. Reliable visitation data for more current years is not available due to discrepancies in visitor count methods and survey intensities. Due to the dispersed nature of access to ASRA/APL, the actual number of visitors is greater than the number of recorded visitors. The total number of existing annual visitors is estimated at approximately one million. The increase in visitation at ASRA/APL has occurred without any substantial improvements to facilities or increases in access points throughout ASRA/APL. Instead, visitation has increased because recreation demand has grown as the local and regional population increased. Thus, the increase in visitation at ASRA/APL was not driven by the development of facilities or infrastructure improvements, and existing facilities and infrastructure were designed for levels of visitation that were approximately one third of current levels.



Source: California State Parks

Figure 3-1 Annual Recorded Visitation from Fiscal Years 1995-1996 – 2013-2014

As described under Section 2.4.1 of the Preliminary GP/Draft RMP and above, ASRA/APL draws the majority of its visitors from the local and regional area. Visitor surveys showed that most people who visit ASRA/APL come from 25 or fewer miles away. In 2010, approximately 60 percent of visitors to ASRA/APL were from El Dorado and Placer Counties (see Table 3-2). As a result, visitation growth at ASRA/APL is closely linked to changes in demand for outdoor recreation resulting from local and regional population growth. As described in the draft EIR/EIS, the regional population (consisting of Placer, El Dorado, Sacramento, Sutter, Yuba, and Yolo Counties) is anticipated to grow to 3,145,647 people by 2040, which is a 30 percent increase over the baseline (2015) population (California Department of Finance [DOF] 2018; see Section 2.4.2, Key Differences among the Alternatives, in the Draft EIR/EIS and Figure 3-2, below). Based on revised regional population growth projections released in January 2020, this regional population growth estimate has been adjusted to 3,011,304 people by 2040, which is a 24 percent increase over baseline population (DOF 2020; Table 3-2 below). However, the population in Placer County, which accounts for nearly half of the visitors to ASRA/APL is projected to grow by 38 percent by 2040 (see Table 3-2).

Table 3-2 Regional Population Growth and Proportion of ASRA/APL Visitation by County

Counties in the Region	2015	2040	Projected County Population Increase	Proportion of Visitation from County
El Dorado County	183,269	213,033	16%	12%
Placer County	371,414	511,683	38%	48%
Sacramento County	1,489,712	1,799,258	21%	13%
Sutter County	96,976	133,610	38%	NA
Yolo County	212,992	253,965	19%	2%
Yuba County	74,472	99,755	34%	NA
Total Regional Population	2,428,835	3,011,304	24%	

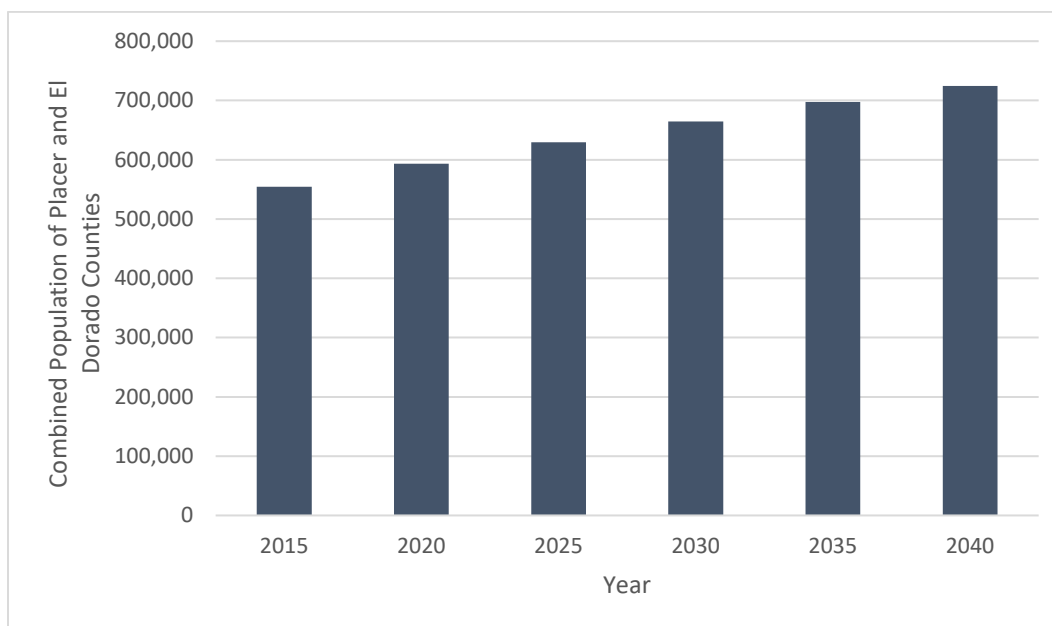
NA = not available

Placer County and El Dorado County are within the Sacramento Region as defined by the Sacramento Area Council of Governments, which defines the Sacramento Region as including El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties.

Source: CSP 2010a, DOF 2020, SACOG 2020

Figure 3-2 shows the projected population growth in Placer and El Dorado Counties from 2015 through 2040. As shown in Table 3-2, an estimated 60 percent of visitors to ASRA/APL are from Placer or El Dorado Counties. Thus, this local population growth is expected to be the primary cause of future increases in demand for and resulting visitation at ASRA/APL. As shown in Figure 3-2, the local population (Placer and El Dorado Counties) is expected to increase from a baseline (2015) population of 554,683 to 724,716. This reflects a 31 percent increase in the local population by 2040.

The projected increase in local and regional population and expected commensurate increase in the demand for recreation at ASRA/APL would occur with or without implementation of the Preliminary GP/Draft RMP. Other interacting factors such as statewide population growth, broad economic trends, and the availability of other recreation opportunities in the region could also affect future increases in visitation to ASRA/APL. Furthermore, due to the dispersed nature of access at ASRA/APL, CSP and Reclamation cannot limit visitation simply by not providing parking spaces or access to amenities, as visitors can and do park along nearby public roads or park along roads within ASRA/APL and walk to their destinations. While some popular access points, such as the Confluence area, could reach a physical capacity during peak periods, increases in visitation driven by the greater outdoor recreation demand from population growth would likely still continue with visitors adjusting their use patterns to access the area at off-peak times, park in unauthorized areas, or access other parts of ASRA/APL.



Source: DOF 2020

Figure 3-2 Local Population Growth

Implementation of the Preliminary GP/Draft RMP would enable the future development of planned facilities that safely increase capacity for visitors, as needed, over the long-term by potentially allowing public vehicular access to one location that is currently closed to public vehicle access, adding parking spaces, adding restrooms and day use facilities (e.g., picnic tables), providing new trail connections, and adding campsites. The Draft EIR/EIS estimated that the Preliminary GP/Draft RMP would provide capacity for up to an approximately 35 percent increase in visitation, which is close to and slightly more than the projected increase in visitation generated by population growth (see Section 2.4.2, Key Differences among the Alternatives, in Chapter 2, Project Description and Alternatives, of the Draft EIR/EIS).

In response to comments that oppose new campsites, and based on a reasoned estimate of the number of new campsites that can be sited in certain areas due to topographic and other constraints, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of potential new campsites that could be developed (see discussion under the heading “Managing the Expected Increase in Visitation,” below). Based on the revised maximum number of campsites envisioned under the Preliminary GP/Draft RMP and reflected in the Final EIR/EIS, implementation of the GP/RMP could accommodate a total estimated increase in visitation of up to 33 percent over the long-term under a full-buildout scenario (i.e., if all proposed facilities were eventually built at the maximum capacity identified in the GP/RMP). Thus, the increases in visitor capacity that could occur under the Preliminary GP/Draft RMP would accommodate a minor (three percent) increase in additional visitation beyond that anticipated solely as a result of regional population. Table 2.4-1, Existing and Estimated Increase in Annual Visitation at ASRA/APL under Each Alternative, in Chapter 2, Project Description and Alternatives, in the EIR/EIS have been revised to update the estimated increase in visitation that could occur with the implementation of a full-build out scenario under the GP/RMP (see revised Table 2.4-1 in Chapter 4, Revisions to the Draft EIR/EIS, of this Final EIR/EIS). Furthermore, each proposed facility would be considered based on need, that is facilities that increase visitor capacity would be developed when visitation exceeds the capacity of existing facilities. Individual facilities would be evaluated through a site-specific planning and design process to determine the appropriate size, location, design, and capacity for that facility, up to the limits allowed in the GP/RMP.

Some comments erroneously cited that a 45 percent increase in visitation or a 45 percent increase in traffic would occur with implementation of the Preliminary GP/Draft RMP. Section 2.4.2, Key Differences among the Alternatives, in Chapter 2 of the Draft EIR/EIS, describes some of the important differences between each of the alternatives to the Proposed Action (i.e., the Increased Resource Management and Recreation Alternative in the Draft EIR/EIS, which reflects the Preliminary GP/Draft RMP). Estimated increases in visitor capacity would differ between each of the alternatives. The Recreation Emphasis Alternative, which was defined as accommodating a greater level of recreation use than the Proposed Action, would increase visitor capacity by approximately 45 percent. If this alternative was implemented, it could accommodate up to a 45 percent increase in visitation; however, this alternative is not proposed. As described above, the estimated increase in visitor capacity as a result of the Proposed Action (i.e., the Preliminary GP/Draft RMP) would be approximately 33 percent, a minor increase above that attributed to population growth alone. The Draft EIR/EIS had indicated the Proposed Action could support up to a 35 percent increase in visitor capacity.

Managing the Expected Increase in Visitation

The intent of the Preliminary GP/Draft RMP is to manage existing recreational use and the increase in visitation demand occurring as the local and regional populations grow, while providing quality recreation, protecting resources, and maintaining public safety. As described above, most of the visitor-serving facilities in ASRA/APL were developed when visitation levels were approximately one third of their current level. Many of these facilities already exceed their capacity during busy periods, which leads to unsafe parking practices, unauthorized camping or trail creation, and can cause both a degraded visitor experience and environmental impacts from unauthorized uses. Some level of new facility and infrastructure development is desirable and necessary to relieve overcrowded and unsafe conditions that already exist and to manage future increases in visitation consistent with the purpose and vision for ASRA/APL.

There are opportunities in various portions of ASRA/APL to provide appropriate facilities, access improvements, and parking to accommodate and expand visitor capacity to help reduce congestion in more heavily used areas of ASRA/APL. The Preliminary GP/Draft RMP includes a number of guidelines that support improving or adding parking in the Auburn Interface, Confluence, Cherokee Bar/Ruck-a-Chucky, Foresthill Divide, Knickerbocker, Lower Middle Fork, Mammoth Bar, Mineral Bar, and Upper North Fork management zones (see Guidelines MZ 1.2, MZ 3.1, MZ 5.1, MZ 5.2, MZ 6.1, MZ 17.1, MZ 23.1, MZ 24.2, MZ 28.1, MZ 29.2, and MZ 32.1). In the Confluence Management Zone, the Preliminary GP/Draft RMP would result in parking improvements or more formalized areas, without adding new parking (Guideline MZ 10.1). The GP/RMP also includes guidelines that would open or improve existing roads to improve access to the river in the Auburn Interface, Knickerbocker, Lake Clementine, and Cherokee Bar/Ruck-a-Chucky management zones (Guidelines MZ 3.1, MZ 6.1, MZ 21.2, MZ 27.1, MZ 27.2, and MZ 27.3). Other proposed visitor management and access improvements would include working with other agencies to evaluate the potential to develop a shuttle system that would travel between heavily used areas of ASRA/APL and offsite parking areas (Guidelines FAC 9.1, FAC 4.2, FAC 8.3, MZ 7.2, and MZ 10.2).

The Preliminary GP/Draft RMP identifies appropriate camping opportunities that could help to reduce congestion at existing campgrounds in ASRA/APL and reduce the potential for unauthorized camping. This component of the Preliminary GP/Draft RMP is also intended to respond to a substantial unmet demand for camping opportunities in the region and statewide, consistent with the purpose of ASRA/APL as an SRA. The Preliminary GP/Draft RMP that was released with the Draft EIR/EIS allowed for the future development of up to 224 new campsites. To avoid understating the effects of new campsites, the Draft EIR/EIS conservatively evaluated the environmental effects of up to 230 new campsites. Based on a reasoned estimate of the number of new campsites that can be sited in various areas of the ASRA/APL due to topography and other constraints, the total maximum number of potential new campsites allowed by the Preliminary GP/Draft RMP has been reduced from 224 sites (220 individual sites and four group sites) to 142 sites (135 individual sites 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 17.2, MZ 23.1, MZ 26.1, MZ 26.2, and MZ 31.1). In addition, CSP and Reclamation identified and corrected an internal inconsistency in Guideline FAC 2.2, which had stated an incorrect total number of campsites. The edits to these guidelines are shown in Chapter 2, Revisions to the Preliminary GP and Draft RMP, and the changes in the number of campsites in the Preliminary GP/Draft RMP are shown in Table 3-3.

Table 3-3 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 ¹ in the GP/RMP
Knickerbocker	0	50 individual	50 individual ²
		3 group	3 group
Auburn Interface	0	50 individual	25 individual ²
		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)	0	20 individual	15 individual

Management Zone	Existing Number of Campsites	New Campsites Originally Proposed in the GP/RMP	Revised Number of New Campsites ¹ in the GP/RMP
		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
Total New Individual Sites	—	220	135²
Total New Group Sites	—	4	7
Total Existing Sites	36	—	—
Total Campsites (New + Existing)	—	260	178

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

² 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

1992 Interim Resource Management Plan

Some comments suggested retaining the 1992 Interim Resource Management Plan (Interim RMP). As described in Section 1.3, History and Purpose Acquired, of the GP/RMP, Reclamation prepared an Interim RMP in 1992, in coordination with CSP, to provide guidance for the management of the area until the proposed Auburn Dam was constructed, with the assumption that much of the area would eventually be inundated by the reservoir. Thus, the guidance in the Interim RMP was to limit the development of infrastructure and facilities based on the assumption that the area would be inundated. The Interim RMP still provides direction for the management of the area today. Because the construction of the Auburn Dam continues to be on hold indefinitely, the Preliminary GP/Draft RMP is necessary to replace the 1992 Interim RMP and provide a long-term and comprehensive framework for the contemporary management of ASRA/APL. Continuing to manage ASRA/APL consistent with the Interim RMP would not address the recreation demand seen today nor the expected continued increase in visitation or demand due to regional population growth. This could lead to increased congestion at already popular areas (e.g., the Confluence), more crowding at existing facilities, additional unsafe parking and access conditions, and a greater chance for unauthorized camping and access, which could degrade resources and visitor experiences, and jeopardize public safety. The 1992 IRMP also does not cover the entirety of ASRA managed by CSP under the current Managing Partner Agreement.

New Facility Development under the GP/RMP

Several comments imply that adoption of the Preliminary GP/Draft RMP would result in the imminent construction of all facilities allowed under the Preliminary GP/Draft RMP. Other comments request site-specific details for new facilities, specific timelines for when new or expanded facilities would be constructed and/or a list of priorities. CSP provides the following guidance on the intended level of specificity of a GP in the CSP Planning Handbook (CSP 2010b):

The general plan is the primary management document for a unit, defining the framework for resource stewardship, interpretation, facilities, visitor use, and operations. General plans define an ultimate purpose, vision, and intent for unit management through statements, guidelines, and broad objectives, but stop short of defining specific objectives, methodologies designs, and timelines on how and when to accomplish these goals. General plans are considered a project for

the purposes of CEQA, and are required by law (PRC Section 5002.2) before any permanent commitment of the unit resources is made.

Reclamation's Guidebook provides the following guidance on an RMP's intended level of detail (Reclamation 2003):

The RMP is to chart the desired future condition for the area in question—the resultant biological, physical, and social condition that Reclamation desires to see once all the RMP management actions have been implemented. The RMP document should be sufficiently detailed to direct future development, but it should be flexible enough to allow resolution of day-to-day problems.

A general plan is the primary management document for a park unit (in this case a SRA) within the State Park System, establishing its vision, purpose, and a management direction for the future. A resource management plan is prepared for lands managed by Reclamation and for lands cooperatively managed with another federal or non-federal entity. The Preliminary GP/Draft RMP provides goals and guidelines for fulfilling the purpose of ASRA/APL. The Preliminary GP/Draft RMP is not intended to prescribe detailed management actions or site-specific details of facilities, but rather outline direction and parameters for future management and facility development. Specific projects that implement the Preliminary GP/Draft RMP are to be developed in subsequent planning efforts as they are needed. Future projects include the preparation of management plans and specific project plans identified in the Preliminary GP/Draft RMP, including separate CEQA/NEPA compliance for those future plans and projects.

The Preliminary GP/Draft RMP identifies allowable improvements to existing facilities and new facilities. These improvements and new facilities represent the maximum amount of development that could occur with implementation of the GP/RMP over the life of the plan (i.e., the next 20 years or more). Section 4.3.3, Facilities, of Chapter 4 in the GP/RMP summarizes facility planning considerations that would be taken at the time that planning for specific facilities occurs. Later project-level planning for facilities would need to undergo site-specific planning to determine the physical limitations that would influence facility design (see Guidelines FAC 2.4, FAC 2.5, FAC 2.6, and FAC 3.2). Planning and design considerations for new or improved facilities include: minimizing impacts to sensitive resources by involving resource specialists early in conceptual design; conducting geotechnical investigations as needed to avoid or minimize potential damage to unique geological and paleontological resources and damage from hazards; incorporating sustainability principles and green building techniques to minimize energy and water consumption, life-cycle costs, and other environmental impacts; considering access and topographic constraints, assessing long-term maintenance needs, evaluating funding and staffing capacity to operate and maintain the facility, and locating or relocating facilities outside areas that are at high risk of flooding or other natural hazards.

Additionally, the timing and design of improved or new facilities would be influenced by a number of factors, such as recreation demand and funding availability for construction, maintenance, and staffing during operation of the facility (see Guidelines FAC 3.1 and V I.12). It is possible that the number and size of facilities planned and developed in project level planning could be less than the maximum allowed by the Preliminary GP/Draft RMP or that the proposed facilities are never built.

The Preliminary GP/Draft RMP itself does not approve any new facilities; and all new facilities being proposed would require a project-specific planning, design, and approval process. Section 1.7, Planning Process, Planning Hierarchy, and Subsequent Planning, of Chapter 1, Introduction, in the GP/RMP states:

With both general plans and resource management plans, subsequent planning occurs to address resource-specific or site-specific topics. At the most site-specific scale, project specific planning, including environmental review, occurs before implementing individual projects that would implement a general plan or resource management plan.

To clarify this project-level planning process, a new goal and guideline have been added to the Preliminary GP/Draft RMP. The new goal and guideline (Goal FAC 9 and Guideline FAC 9.1) are included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS and below in Master Response 3. The new Guideline FAC 9.1 summarizes the components of project level planning required for any new or expanded facility.

The Preliminary GP/Draft RMP identified activity nodes and management zones in which future facilities could be located. Future project-level planning further defines the best specific location for that new facility. Site-specific planning and design would include verification of consistency with the goals and guidelines of the GP/Draft RMP to ensure that individual projects are consistent with goals for protecting resources and maintaining public safety. As part of the project-level planning process, detailed plans and specifications would be developed. The level of public involvement for improvements or new facilities would vary depending on location, and the expressed interest in that facility development. A public involvement process would occur as part of the project-level planning for facilities, such as campgrounds or new day-use areas. All new or expanded facilities or other projects would require completion of the appropriate level of environmental review.

Some comments expressed concern that new facilities would be developed without implementing fuels treatments and questioned evacuation from these facilities in the event of a wildfire. As identified in Guideline RES 8.6 and new Guideline FAC 9.1, the project-level planning for a new facility (including campgrounds and access routes) would identify and implement fuel clearance and defensible space around those facilities prior to or as part of construction of the facility. The Preliminary GP/Draft RMP also includes Guideline RES 10.2, which requires coordination with applicable fire agencies in the planning of new or expanded recreation facilities and incorporation of feasible emergency access recommendations prior to constructing or expanding facilities. Also, the federal decision process described in Chapter 1, "Introduction," and new Guideline FAC 9.1 reinforce Reclamation's and CSP's commitment to ensuring that fire and emergency management agency input is gathered and considered as part of facility development planning and potential subsequent implementation. Please refer to Master Response 3, Wildfire Risk, which further addresses concerns related to wildfire risk and wildfire risk reduction strategies.

Conclusion

As discussed above, the Preliminary GP/Draft RMP is intended to guide management of ASRA/APL to protect resources and maintain public safety while addressing the need to provide quality recreation opportunities. The Preliminary GP/Draft RMP addresses the lack of visitor accommodation over the last 30 years, which has caused the quality of visitor experience to be degraded and allows for increases in visitor capacity in response to demand and population growth in order to accommodate current and projected future visitation. The Preliminary GP/Draft RMP sets limits on the maximum number, size, location, and types of facilities that could be developed over time in response to visitation and resource needs. Additionally, the Preliminary GP/Draft RMP does not approve the development of any individual facilities because those facilities would be required to undergo a subsequent project-level planning process, including project design, public input, and environmental review.

3.2.2 Master Response 2: Public Engagement

Introduction

Some comments on the GP/RMP and Draft EIR/EIS express an opinion that there was insufficient public involvement in preparation of the Preliminary GP/Draft RMP. A number of comments contend that there was a lack of outreach to nearby communities, especially on the El Dorado County side of ASRA/APL, or express an opinion that more public workshops should have been located in El Dorado County. Several comments also expressed the belief that there was not sufficient outreach to stakeholder agencies. Other comments expressed a desire for ongoing communications between CSP and Reclamation and residents of nearby communities.

Development of the Preliminary GP/Draft RMP, alternatives, and Draft EIR/EIS involved an extensive public engagement process over many years, which included many different opportunities for interested parties to participate in the planning process. Because the project has involved an extensive planning process, the opportunities for public input far exceed legal requirements for the environmental review process. Public engagement has been extensive, inclusive, and representative. CSP and Reclamation have notified interested parties and encouraged their participation throughout the planning process. Thousands of individuals and organizations participated in the planning process helping to shape a GP/RMP that balances many different viewpoints and interests. Public input helped to identify the issues to be addressed in the GP/RMP, shape the alternatives that were considered, and develop a Preliminary GP/Draft RMP. Public input has also resulted in many recent refinements to Preliminary GP/Draft RMP, which are shown in Chapter 2, “Revisions to the Preliminary GP and Draft RMP”, in this Final EIR/EIS. Public input will continue to inform the finalization and implementation of the GP/RMP.

This master response summarizes the timeline and methods of public engagement throughout the planning process and describes how the public input on the Preliminary GP/Draft RMP has been extensive and representative of the many communities and interests that care about ASRA/APL. It also explains how CSP and Reclamation selected locations for public workshops and coordinated with other agencies.

Timeline and Methods of Public Engagement

A summary of interagency and public involvement efforts conducted for the GP/RMP planning process is presented in Section 1.3, “Interagency and Public Involvement”, in Chapter 1, “Introduction and Approach”, of the Draft EIR/EIS. This public and interagency involvement was guided by an outreach and public participation plan that was specifically developed to achieve broad and representative public input by providing numerous opportunities for public involvement throughout the planning process. Additionally, materials such as public notices, visitor survey report, summaries of public comments, and stakeholder meeting notes are available on the general plan website: www.parks.ca.gov/PlanASRA/. Public engagement occurred in five primary phases, described below: 1) early engagement in 2006 – 2008, 2) plan scoping and issue identification in 2015, 3) alternatives development and environmental scoping in 2017, 4) review of the Preliminary GP/Draft RMP in 2018, and 5) review of the complete Draft GP/RMP and Draft EIR/EIS in 2019.

2006 – 2010: Early Engagement

In recognition of the need for a new plan for ASRA/APL, Reclamation and CSP initiated a process to develop a new GP/RMP between 2006 and 2008. Several public workshops and stakeholder meetings

were held. This planning process was suspended until a new Managing Partner Agreement was developed between CSP and Reclamation. However, relevant input from this early stage was incorporated into the Preliminary GP/Draft RMP. This phase involved:

- ◆ June 2006: Notice of Intent to prepare an EIS was published in the Federal Register, which invited public comment.
- ◆ April – June 2006: Five stakeholder focus group meetings
- ◆ May 2006: Newsletter released summarizing the planning process and providing a notice regarding the first public workshop
- ◆ May – October 2006: Auburn State Recreation Area Visitor Survey was undertaken to collect visitor information to help inform the GP/RMP. CSP staff collected surveys from 528 individuals over the course of 53 different survey days.
- ◆ June 2006: Public workshop held to introduce the planning process and gather initial public input on key issues to be addressed in the plan.
- ◆ April 2007: Four stakeholder focus group meetings.
- ◆ May 2007: Newsletter released providing an update on preparation of the GP/RMP and EIR/EIS
- ◆ June 2007: Public workshop to present alternate options and ideas to address key issues.
- ◆ August 2010: State Parks Visitor Survey, 2007–2009, Results for Auburn State Recreation Area

2015: Plan Scoping and Issue Identification

In 2015, CSP and Reclamation restarted the planning process and prepared an outreach and public participation plan that summarized the strategies to engage the public and outside agencies and organizations in the creation of a successful GP/RMP and EIR/EIS for ASRA/APL. This plan guided the coordinated efforts of CSP staff, Reclamation staff, and the consultants throughout the planning process, which included the public engagement efforts described below. During 2015, outreach efforts summarized input from the early engagement process and sought public input on key issues to be addressed in the GP/RMP. Specific public outreach efforts at this time included:

- ◆ CSP and Reclamation established a GP/RMP webpage (www.parks.ca.gov/PlanASRA) to share information throughout the planning process and provide opportunities for input and used the various methods discussed below to distribute this webpage address to interested parties.
- ◆ Rangers distributed contact cards to visitors at ASRA/APL, which invited them to participate in the GP/RMP planning process and provided the GP/RMP website address and provided information on how to receive updates on the planning process.
- ◆ October 2015: Postcards were mailed to known stakeholders, affected agencies, and interested organizations and individuals, as well as to property owners within 200 meters of ASRA/APL in Placer and El Dorado counties. The postcard was also mailed to individuals on the contact list from the early engagement process between 2005 and 2010. The postcard provided a notification of the public workshop in November 2015, the GP/RMP website address, and information on how to receive future notifications about the planning process.

- ◆ October 2015: CSP sent a press release to over 800 media outlets, including local papers (e.g., Sacramento Bee, Auburn Journal, Mountain Democrat, and Georgetown Gazette), advertising opportunities for public input at the November 12, 2015 public open house.
- ◆ November 2015: A newsletter and e-mail bulletin (also referred to as eblasts) were released to provide information about the planning process, upcoming public workshop, and ways for interested individuals to participate in the process.
- ◆ November 2015: A public open house was held to seek input on planning issues and concerns. Approximately 250 people attended this open house. This meeting included a presentation introducing the planning process and then stations where the public could learn about specific areas or topics.

2017: Alternatives Development and Environmental Scoping

Public engagement in 2017 through early 2018 focused on sharing draft alternatives for consideration in the GP/RMP and EIR/EIS, collecting input to refine the GP/RMP alternatives, and gathering input on topics that should be addressed in the EIR/EIS. Specific public outreach efforts during this time included:

- ◆ The GP/RMP website was updated with summaries of the draft GP/RMP alternatives.
- ◆ October 2017: E-mail bulletin sent out to the contact list, which included a save the date for the December 7, 2017 public open house.
- ◆ November 2017: Newsletter and e-mail bulletin released to summarize the proposed alternatives for the GP/RMP, notify the public of the scoping period for preparation of the EIR/EIS, and invite public input at the December 7, 2017 public workshop. The newsletter was made available in English and Spanish.
- ◆ November 2017: Notice of Preparation (NOP) for the Draft EIR/EIS published in the Auburn Journal, Mountain Democrat, and Sacramento Bee; emailed to the contact list and affected agencies; and posted with the county clerks in Placer and El Dorado Counties. It sought input from the public on the scope of the environmental issues and potential environmental effects to be included in the EIR/EIS and invited the public to attend a scoping meeting. The public scoping period during which comments were collected for preparation of the EIR/EIS began on November 29, 2017 and closed on January 5, 2018.
- ◆ November 2017: CSP sent a press release to over 800 media outlets, including local papers (e.g., Sacramento Bee, Auburn Journal, Mountain Democrat, and Georgetown Gazette), providing notification of the opportunity for public input at the December 7, 2017 public open house.
- ◆ December 2017: A public open house was held to provide information and solicit input on the draft GP/RMP alternatives and issues to be addressed in the EIR/EIS. Over 200 people attended this workshop.
- ◆ December 2017 – January 2018: An online engagement tool was included on the GP/RMP webpage and advertised. It included information on the draft alternatives and a detailed questionnaire that allowed members of the public to identify preferences for various management actions included in the draft alternatives. Approximately 850 individuals provided input through this online engagement tool.

2018: Alternative Refinement and GP/RMP Development

In 2018, public engagement focused on sharing information on the management actions, facilities, and goals and guidelines proposed for the GP/RMP and soliciting input related to concerns or refinements to the features of the Preliminary GP/Draft RMP. Specific public outreach efforts during this time included:

- ◆ The GP/RMP website was updated with fact sheets addressing topics raised by previous public input including the hunting program, fire management plan, road and trail management plan, and whitewater management program.
- ◆ The GP/RMP website was updated to include a summary of the Preliminary GP/Draft RMP, including a description of all management actions and facilities included in the Preliminary GP/Draft RMP.
- ◆ Email bulletins were sent to the contact list of 3,500 individuals four times (January, May, June, and July 2018). The January e-mail bulletin notified the public that the public comment period for environmental scoping and review of the GP/RMP alternatives was extended. The May e-mail bulletin notified the public of the availability of the summary of the Preliminary GP/Draft RMP and the upcoming June public workshop. The June e-mail bulletin was a reminder of the public workshop and availability of the summary of the Preliminary GP/Draft RMP. The July e-mail bulletin reminded interested individuals to provide public input on the summary of the Preliminary GP/Draft RMP and included a link to the online questionnaire. E-mail bulletins can be forwarded by recipients to help share the notice with others.
- ◆ June 2018: CSP sent a press release to over 800 media outlets, including local papers (e.g., Sacramento Bee, Auburn Journal, Mountain Democrat, and Georgetown Gazette), providing notification of the opportunity for public input at the June 26, 2018 public workshop.
- ◆ June 2018: Over 150 people attended the public open house on June 26, 2018. The open house shared information regarding the management actions and facilities included in the Preliminary GP/Draft RMP and provided an opportunity for public input on the proposed facilities and management actions.
- ◆ June – July 2018: An online engagement tool with information on the features of the Preliminary GP/Draft RMP and a detailed questionnaire was made available to receive public input through the GP/RMP website. Approximately 500 individuals provided input through the online engagement tool.

2019: Review of the GP/RMP and Draft EIR/EIS

In 2019, public engagement revolved around the review of the complete Preliminary GP/Draft RMP and the Draft EIR/EIS. The purpose of this phase of public engagement was to share the completed GP/RMP and solicit input on the completeness and adequacy of the Draft EIR/EIS. Specific public outreach efforts during this time included:

- ◆ Summer 2019: CSP sent two press releases to over 800 media outlets, including local papers (e.g., Sacramento Bee, Auburn Journal, Mountain Democrat, and Georgetown Gazette). The July 19 press release notified the public of the release of the GP/RMP and Draft EIR/EIS and of the public open house, at which the public could review exhibits, ask questions, and leave written comments. The August 27 press release notified the public of the comment period extension.

- ◆ July 2019: A Notice of Availability was published in the Auburn Journal and Mountain Democrat. This notice provided information on how to review and provide comments on the GP/RMP and Draft EIR/EIS.
- ◆ July 2019: The GP/RMP and Draft EIR/EIS was released on July 19, 2019, which marked the beginning of the public comment period seeking input on these documents. The GP/RMP and Draft EIR/EIS was available on the GP/RMP website and hard copies were made available at CSP offices in Auburn, Folsom, and Sacramento; Reclamation's California-Great Basin Regional Office in Sacramento; Auburn Recreation District Canyon View Community Center adjacent to ASRA/APL; and public libraries in Auburn, Placerville, Foresthill, and Colfax.
- ◆ In late August, CSP and Reclamation extended the deadline for the public review period from September 3, 2019 to September 17, 2019 to provide additional time for public review.
- ◆ July – August 2019: CSP and Reclamation sent out three e-mail bulletins to a contact list of over 3,500 individuals who had expressed interest in the planning process. The e-mail bulletins notified the public of the release of the GP/RMP and Draft EIR/EIS and the upcoming open house, reminded recipients of the availability of the documents and upcoming open house, and notified the public of the extended comment period.
- ◆ August 2019: On August 15, 2019, CSP and Reclamation hosted a public open house to share information about the recently released GP/RMP and Draft EIR/EIS and collect comments on the GP/RMP and Draft EIR/EIS. An estimated 350 people attended this public workshop.

Extensive and Representative Level of Public Input

Some comments expressed an opinion that there was no public engagement process prior to publication of the complete GP/RMP and Draft EIR/EIS, or that residents of smaller communities adjacent to ASRA/APL (e.g., Cool, Auburn Lake Trails, Pilot Hill, Foresthill Divide, Todd's Valley, Georgetown, Greenwood, Colfax, Meadow Vista, and Applegate) or residents of El Dorado County were not represented in the public planning process.

As demonstrated above with the list of public workshops, e-mail bulletins, press releases, notices, interactive websites, questionnaires, and comment periods, the public engagement process was extensive and allowed many people, organizations, and agencies to participate throughout the GP/RMP planning process and EIR/EIS environmental review process. The e-mail bulletin contact list contains over 3,500 people that had expressed interest throughout the lengthy planning process. In 2015, prior to the public workshop in November 2015, a postcard was mailed to known stakeholders, affected agencies, and interested organizations and individuals as well as to all adjacent property owners within 200 meters of ASRA/APL. Over 1,800 postcards were mailed.

As described above, the public workshops were well attended - ranging from over 150 to over 350 attendees. Comments provided by attendees at each of the workshops informed the development of alternatives for the GP/RMP, the Preliminary GP/Draft EIR/EIS. Each public workshop had a sign-in sheet for attendees, which included space for attendees to provide their name, zip code, and email address to be added to the contact list, if they desired. Attendees at the public workshops included residents from many different areas and included representation from the smaller communities adjacent to ASRA/APL in El Dorado and Placer counties. For example, based on the zip codes provided at the June 2018 public workshop, 20 percent of the attendees were from the adjacent small

communities of Cool, Auburn Lake Trails, Pilot Hill, Foresthill Divide, Todd's Valley, Georgetown, Greenwood, Colfax, Meadow Vista, and Applegate. Thus, small communities adjacent to ASRA/APL were well represented in the planning process.

As described above, two online engagement opportunities were provided during the development of the Preliminary GP/Draft RMP. Based on a review of zip codes provided by participants in those opportunities, it is clear that input was provided by residents of all surrounding Counties and that participation from residents in El Dorado County was actually over-represented compared to the proportion of visitors that come from El Dorado County. Based on the results of 2006 visitor surveys, approximately 48 percent of visitors to ASRA/APL are from Placer County, 13 percent are from Sacramento County, and 12 percent are from El Dorado County (see Section 2.4.1, Visitor Profile, on page 2-78 of the GP/RMP). Of the 580 participants that provided input on park-wide questions related to the draft alternatives in December 2017 through January 2018, 35 percent were from Placer County, 17 percent were from Sacramento County, and 14 percent were from El Dorado County. Thus, the public engagement was representative of visitors to ASRA/APL, and residents of El Dorado and Sacramento Counties were slightly over-represented compared to proportion of visitors from those counties.

Residents of El Dorado County were well-represented among the individuals that chose to provide input on the proposed facilities and management actions contemplated for the Knickerbocker Management Zone near Cool in El Dorado County. For example, of the 260 participants that provided comments on the Knickerbocker Management Zone in the June to July 2018 online questionnaire, 58 percent were residents of El Dorado County. This indicates that residents of El Dorado County were heavily engaged in the development of the GP/RMP, particularly with respect to those portions of ASRA/APL that are in El Dorado County.

CSP and Reclamation have also been available to meet with any interested groups or organizations throughout the GP/RMP planning process. During the early engagement period in 2006 and 2007, CSP and Reclamation hosted several stakeholder focus group meetings with individuals representing numerous groups and interests to solicit input on issues and proposals to include in the GP/RMP. Throughout 2015 through 2018, CSP staff met with representatives of groups including Protect American River Canyons (PARC) and the Mammoth Bar Taskforce several times to discuss those groups' input on the Preliminary GP/Draft RMP. This coordination has continued after release of the complete GP/RMP and Draft EIR/EIS, and in October 2019, CSP met with the newly-formed Divide Action Coalition three times to discuss their input on elements of the GP/RMP.

The Preliminary GP/Draft RMP includes a new Goal FAC 9 and Guideline FAC 9.1 that have been added to the Preliminary GP/Draft RMP (see Chapter 2; Section 2.6 Revisions to Chapter 4, The Plan) to clarify that a comprehensive project level planning and design process would occur prior to or in conjunction with the development of any new or expanded facilities. Guideline FAC 9.1 specifies that prior to facility development, a public involvement process would be implemented to engage the local community, park visitors, and other interested members of the public at early stages of project development and thereafter, as needed. Thus, there are future opportunities for public engagement related to implementation of the GP/RMP, and the public engagement process would not end with adoption of the GP/RMP.

Location of Public Workshops

Some comments expressed a concern that most of the public workshops were held in the City of Auburn in Placer County. ASRA/APL is located within Placer and El Dorado counties with the most heavily used areas located close to Auburn and Cool. CSP and Reclamation considered a number of factors in selecting the workshop locations. Workshop venues had to be of a sufficient size to accommodate the anticipated number of attendees, close to ASRA/APL, within a reasonable driving distance for residents of all of the small communities surrounding ASRA/APL, and reasonably close to Interstate 80 to accommodate regular visitors to ASRA/APL that travel from the Sacramento region.

The June 2006, May 2007, November 2015, December 2017, and June 2018 public workshops were located at various locations in Auburn and, in response to comments from the public, the August 2019 public workshop was hosted in Cool. Auburn was chosen as a reasonably central location for most workshops to allow participation by residents of all surrounding communities. The workshops were all held over the course of 2 to 3 hours on weekday evenings when most people would be available.

Table 3-4 shows the distances of the workshop locations to some of the nearby communities and other cities in the region in which some of the workshop attendees live, such as Sacramento, Roseville, and Placerville. The town of Cool is located 7 to 9 miles driving distance from the various workshop locations in Auburn. Communities near the edge of the far northeastern end of ASRA/APL, such as Colfax and Foresthill, are located over 17 miles in driving distance from the workshop locations in Auburn and over 22 miles in driving distance from the workshop location in Cool. Attendees at the public workshops also included residents of cities located even further away, for example Sacramento, which is 32 to 41 miles driving distance from the workshop locations in Auburn and Cool.

The public workshops were one of many different opportunities for public engagement. As described above under the header “Timeline and Methods of Public Engagement,” individuals that were not able to attend a workshop had access to the same information available at the workshops and had numerous other opportunities to provide input.

Table 3-4 Distances of the Public Workshop Locations to Nearby Communities and Other Cities in the Region

Workshop Date	Workshop Location	Auburn	Cool	Colfax	Foresthill	Auburn Lake Trails	Roseville	Sacramento	Placerville
June 15, 2006 May 30, 2007	Canyon View Community Center 471 Maide Drive, Auburn	0	8	18	21	13	17	34	28
November 12, 2015	Skyridge Elementary School 800 Perkins Way, Auburn	0	9	19	21	13	16	32	29
December 7, 2017 June 26, 2018	Gold Country Fairgrounds 209 Fairgate Road, Auburn	0	7	17	20	12	17	33	27
August 15, 2019	Northside Elementary School 860 Cave Valley Road, Cool	8	0	23	22	6	24	41	19

Source: Compiled by Ascent Environmental in 2020

Interagency Engagement

Some comments suggested that local agencies were not contacted during the planning process. In addition to the numerous opportunities for engagement described above, the GP/RMP planning process included two interagency workshops (September 20, 2017 and May 2, 2018) to solicit input from state, federal, and local agencies at key points in the planning process. Agencies invited to these meetings included Placer County, El Dorado County, Auburn Recreation District (ARD), City of Auburn, Georgetown Divide Public Utility District, Georgetown Fire Protection District, Georgetown Divide Recreation District, Placer County Water Agency, Placer County Fire Alliance, CAL FIRE, Caltrans, and several other state and federal agencies. At the September 2017 interagency workshop, CSP and Reclamation sought input from these agencies on the proposed alternatives for the GP/RMP. At the May 2018 interagency workshop, CSP and Reclamation sought input from these agencies on the draft CSP proposed action for the GP/RMP. CSP and Reclamation also conducted a number of other agency outreach efforts throughout the GP/RMP planning process and environmental review process, and provided updates and answered questions from numerous agencies. Additionally, a meeting with state and local fire agencies was held on February 19, 2020 to gain further input on the Preliminary GP/Draft RMP and to help inform preparation of the Final EIR/EIS. Agencies that participated included: CAL FIRE, Placer County Fire, South Placer Fire District, Auburn Fire Department, Foresthill Fire Protection District, Georgetown Fire District, and El Dorado County Fire.

Conclusion

Public engagement opportunities during the planning process for the GP/RMP and preparation of the EIR/EIS have been extensive, inclusive, and representative. The outreach and public input far exceeded legal requirements for the environmental review process. CSP and Reclamation made a good faith effort to notify all interested parties and encourage their participation throughout the planning process. Thousands of individuals and organization participated in the planning process helping to shape a GP/RMP that balances many different viewpoints and interests. Public input helped to identify the issues to be addressed in the GP/RMP, shape the alternatives that were considered, and develop a Preliminary GP/Draft RMP. Public input continues to shape and refine the GP/RMP, and Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS includes numerous revisions to the Preliminary GP/Draft RMP based on recent input. CSP and Reclamation recognize that despite the extensive the public outreach efforts, some interested individuals and organizations may not have been aware of the planning process. However, CSP and Reclamation are committed to continuing to inform and engage interested parties throughout finalization and implementation of the GP/RMP.

3.2.3 Master Response 3: Wildfire Risk

Introduction

Numerous comments expressed concerns about the risk of wildfire associated with implementation of the Preliminary GP/Draft RMP. These comments contend that there could be an increased risk of a wildfire due to new or expanded facilities (e.g., additional campsites, parking facilities, and roadway improvements) and associated visitation, and suggested that the Preliminary GP/Draft RMP did not include detailed and effective proposals to reduce wildfire risk. Comments also suggested that prior to development of new or expanded facilities, a comprehensive Fire Management Plan should be prepared, funded, and implemented; and that other measures in the GP/RMP that reduce wildfire risk be implemented prior to development of new or expanded facilities.

The Preliminary GP/Draft RMP recognizes that wildfire risk in ASRA/APL is a serious threat that is increasing due to climate change and other factors (see “Wildfire Management” on page 3-8 of Chapter 3, Issues and Analysis, of the GP/RMP). To reduce the risk of wildfire, the Preliminary GP/Draft RMP includes numerous measures that would: 1) substantially increase vegetation management to reduce fire fuels; 2) reduce the risk of human-cause wildfire ignitions through additional fire restrictions, enforcement, education, and by directing visitation to appropriate locations; and 3) improve emergency response and evacuation infrastructure, coordination and planning. In response to public comments, the Preliminary GP/Draft RMP was revised to include additional wildfire risk reduction measures, which are included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS. Some comments expressed concern related to increases in wildfire risk or issues with evacuation outside of ASRA/APL. It is worth noting that wildfire risk is an existing condition within ASRA/APL and in the surrounding area. The actions of CSP and Reclamation did not create a wildfire risk near developed communities. Rather, urban development has encroached into the naturally fire prone area surrounding ASRA/APL.

As described in more detail in Master Response I, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040 because of regional population growth, regardless of whether a GP/RMP is adopted. The Preliminary GP/Draft RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. To this end, the Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by up to approximately 33 percent over the next 20 or more years. In this scenario, visitor capacity would be able to accommodate a very minor increase in the visitation above the level expected without adoption of a GP/RMP. The Draft EIR/EIS discloses the risk associated with this incremental increase in visitor capacity, as influenced by the environmental protections of implementing the management goals and guidelines in the Preliminary GP/Draft RMP. Considering both factors, the Draft EIR/EIS determined that the GP/RMP provided sufficiently protective wildfire risk-reduction measures to address the existing wildfire risk and offset the incremental increased risks from visitation that could occur under the GP/RMP, as described below.

This master response describes wildfire risks associated with the type and locations of visitation that could occur under the Preliminary GP/Draft RMP. It describes, the Preliminary GP/Draft RMP strategies to reduce wildfire fuels, reduce the risk of human-cause ignitions, and improve wildfire suppression and emergency evacuation readiness; and summarizes the wildfire risk associated with adoption of the Preliminary GP/Draft RMP.

Relationship Between Wildfire Risk and Visitation

The Draft EIR/EIS explains the factors affecting wildfire risk in general, and specific to the project area (pages 4.17-3 to 4.17-4 and 4.17-5 to 4.17-7). On page 4.17-8, the Draft EIR/EIS discloses that human-induced wildfire ignitions are a leading cause of wildfire and goes on to explain that “[in the future,] conditions conducive to wildfire would continue to worsen; that is, the risks and dangers associated with wildfire would become worse over time due to climate change and direct human influence associated with population growth in the region.” The Draft EIR/EIS also explains how increases in the number of visitors at ASRA/APL can contribute to an increased risk of wildfire ignitions. As described above and in Master Response I, the Preliminary GP/Draft RMP could result in a minor increase in visitor capacity over the level of visitation that is expected to occur solely due to population growth

with or without a GP/RMP. This increased potential visitation could increase risk of wildfire ignitions; however, the risk of wildfire ignitions is influenced by the types of activities, locations of visitors, and environmental protections in place, not just the total number of visitors.

Regardless of adoption of a GP/RMP, visitation to ASRA/APL is expected to increase by roughly 30 percent by 2040 due to regional and local population growth. Because many visitor-serving facilities (e.g., parking lots, campgrounds, day use sites) are already at capacity during peak periods, many of these additional visitors would access ASRA/APL outside of developed facilities, for example accessing the river at remote locations or camping at dispersed sites outside of developed campgrounds. Visitor use outside of developed facilities results in a greater risk of wildfire ignitions than managed visitation within appropriately design facilities. When visitation occurs in an unmanaged fashion away from appropriately designed facilities, visitors are more likely to engage in risky or unauthorized behavior, such as creating illegal campfires or using fireworks. The wildfire risk associated with unmanaged use is greater because there are 1) fewer law enforcement or other staff in the area to enforce safety requirements, 2) less information available about risks and unsafe activities, 3) a lack of defensible space and fuel management, and 4) uses may be in difficult to access locations that can make fire suppression more problematic. In contrast, when visitation is directed to appropriately designed facilities, the risk of wildfire ignitions is substantially reduced due to 1) the presence of law enforcement and other staff that educate and enforce safety requirements, 2) additional educational materials addressing prohibited and unsafe activities, 3) defensible space improvements that reduce the amount of flammable vegetation surrounding visitor use areas, and 4) emergency suppression access and equipment that allows a wildfire to be quickly suppressed.

Many comments express concern about increased wildfire risks from developed campsites. As stated above, developed campsites are proposed, in part, to direct visitors to appropriate areas and discourage unmanaged uses, such as illegal campfires. A literature review revealed no studies that quantitatively compared the risks of wildfire from recreation in developed campsites compared to dispersed recreation uses. One older study does note that directing use to developed campsites and picnic areas has been a strategy to reduce wildfire risks associated with dispersed recreation since before the 1940's. It also documents that campfires from dispersed recreation outside of designated campgrounds (i.e., the type of use the Preliminary GP/Draft RMP seeks to discourage) were a leading cause of wildfires in the Pacific Northwest (Hogans 1979). A review of the actual causes of past wildfires in ASRA/APL from 1999 to 2014 supports this finding. The majority of wildfires within ASRA/APL were caused by negligent or illegal activities including fireworks, arson, shooting, smoking, and illegal campfires—the exact types of activities that are more likely to occur when visitation is not managed and directed to appropriately designed and staffed facilities like those proposed in the Preliminary GP/Draft RMP. Furthermore, no wildfires in ASRA/APL during this period were caused by legal campfires within designated campsites (Reclamation 2019a). The 2016 Trailhead Fire began near a composting toilet on the Middle Fork of the American River. No other recent fires within ASRA/APL were started near developed facilities.

For the reasons described above, it is reasonable to direct visitors to appropriately designed facilities as a strategy to reduce environmental impacts, including the risk of wildfire. The Preliminary GP/Draft RMP also includes numerous strategies to reduce wildfire risk through wildfire fuel reduction, wildfire prevention, and emergency response improvements. In response to public comments, the Preliminary GP/Draft RMP was revised to expand wildfire risk reduction measures. The wildfire risk reduction strategies, including recent revisions to the Preliminary GP/Draft RMP are described below.

Wildfire Fuel Reduction

The Preliminary GP/Draft RMP calls for substantially increased fire fuel reduction treatments in ASRA/APL. The amount of additional treatment area is described on page 4.17-13 of the EIR/EIS, as follows:

[T]he area of the park with existing facilities, roads, and other resources that is currently untreated but that would receive treatment at some point with implementation of the Proposed Action is estimated at approximately 2,000 to 2,500 acres. Meanwhile, the currently treated area within ASRA/APL consists of the Auburn shaded fuel break and comprises a total of 232 acres. This represents an approximate 1,000 percent increase in the amount of treated area, which would be specifically targeted at potential ignition and evacuation areas.

Since publication of the Draft EIR/EIS, Reclamation has finalized the Auburn Fire Management Plan (FMP) for ASRA/APL, which will be updated regularly to reflect changes in fuel treatment projects as they are completed and new ones are developed, and may be updated in the future in response to the prevailing science on fuels management and other methods for fire prevention. The FMP identifies additional, specific fuel management projects and prescriptions consistent with Preliminary GP/Draft RMP Guideline RES 8.4 (GP/RMP page 4-19). In general, the FMP commits to, “reduction of wildland fuels in strategic locations [to] enhance fire suppression activities and provide increased firefighter safety. Fuels management activities will occur on (1) Reclamation lands adjacent to other properties that enhance defensible space activities, (2) on Reclamation lands adjacent to public access roads and trails, and (3) on Reclamation core lands to increase wildlife habitat benefits and increase water values” (Reclamation 2019b: Appendix A, page 5).

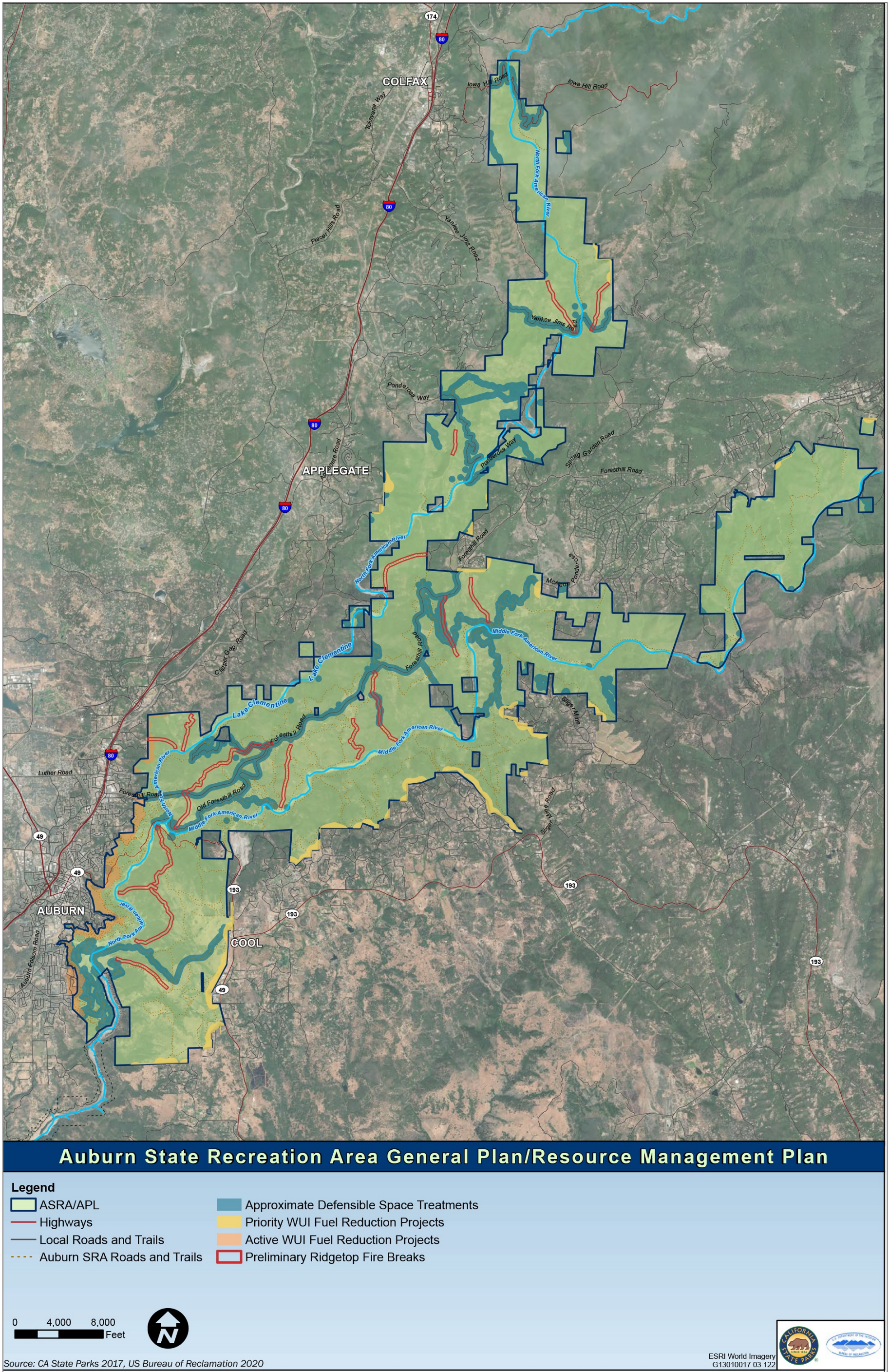
The FMP identifies active fuel reduction projects within the Wildland Urban Interface (WUI) adjacent to the greater Auburn area (Figure 3-3). It also identifies priority fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate, as well as a series of ridgetop fuel breaks throughout ASRA/APL. The FMP includes an annual update process to identify treated and near-term priority areas to be treated each year. Wildfire management approaches would be assessed, updated, and prioritized in coordination with other fire management agencies as stated in Guideline RES 8.3 in the Preliminary GP/Draft RMP. The FMP also identifies the strategies that would be employed within each of the identified priority areas to maximize the effectiveness of fuel treatments. These include shaded fuel breaks, brush field and grass field prescriptions, along with follow-up management activities including prescribed burning (Reclamation 2019b).

In addition to the fuel reduction activities in the WUI, the Preliminary GP/Draft RMP includes the following revised guidelines, which would result in additional fuel reduction along roadways and trails, and at recreation sites:

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.

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 ~~the~~ constructing or expanding the facility or prior to opening the road or trail for public vehicle access.

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Source: Provided by Reclamation in 2020

Figure 3-3 ASRA/APL Proposed Fuel Reduction Projects

CSP and Reclamation would also coordinate with El Dorado and Placer Counties and the City of Auburn to take an active role in reviewing land use plans, zoning changes, and development proposals on adjacent lands to encourage strategies to reduce wildfire risk such as maintaining adequate setbacks and defensible space associated with adjacent development (see Guideline RES 8.12).

Some comments requested more information on whether fuel reduction activities near recreation sites would occur prior to the construction or opening of new or expanded facilities. To clarify, the sequencing of fuel reduction treatments near facilities, a new Goal FAC 9 and Guideline FAC 9.1 have been added to the Preliminary GP/Draft RMP (see Chapter 2; Section 2.6 Revisions to Chapter 4, The Plan) to clarify that a comprehensive project level planning and design process, including implementation of fuel reduction and defensible space treatments, would occur prior to or in conjunction with the development of any new or expanded facilities. The new Guideline FAC 9.1 is as follows:

Guideline FAC 9.1: Comprehensive project level planning for new or expanded (i.e., beyond 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., transportation impacts, 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.

Some comments questioned whether fire fuel reduction is an effective wildfire risk reduction strategy. While fuel reduction may not stop ember driven wildfires during periods of extreme wind, fuel reduction through vegetation management activities, such as those proposed in the GP/RMP, have been demonstrated to be successful in reducing the intensity and severity of wildfires, and creating favorable conditions for firefighting to protect targeted, high-value resources. Fuel reduction has proven successful where it is targeted at protecting specific resources in limited geographic areas, such as in areas of high fire danger or in the WUI (Loudermilk et al. 2014; California Board of Forestry 2019)—precisely the type of conditions at ASRA/APL. Treated areas typically exhibit different fire progression characteristics and reduced fire severity from areas that are not treated (Lydersen et al. 2017, Johnson and Kennedy 2019). As stated on page 4.17-5 of the EIR/EIS, “where [fuels] treatments have occurred, the pattern of wildfire progression may be limited in some areas to low-intensity underbrush and surface burning, which can create safe conditions for firefighters to successfully suppress fires in areas near homes or other structures. Fuel treatments also promote faster forest recovery post-fire by causing less damage to soils and leaving some live vegetation within burn areas (USFS 2009), protecting resources such as soils, wildlife, riparian function, and wetlands (Kim et al. 2013).” Quantitative modeling has provided robust empirical support for the basic principles of mechanical thinning treatments that increase canopy openness while retaining the largest trees in a stand, coupled with the reduction of surface fuels through prescribed burning (Martinson and Omi 2013). Prescribed burning as a follow-up treatment to reduce surface ladder fuels and to eliminate slash (i.e., limbs and branches) generated by mechanical thinning has shown to have the greatest benefit in moderating fire behavior (Martinson and Omi 2013). The shaded fuel break, brush field prescriptions, and grass field prescriptions identified in Appendix A of the FMP are consistent with the most effective types of fuel management activities.

The Draft EIR/EIS evaluates the effects of the wildfire fuel reduction strategies in the Preliminary GP/Draft RMP under the subheading “Wildfire Intensity and Size” as part of Impact 4.17-1 beginning on page 4.17-2. On page 4.17-14 of the Draft EIR/EIS, the analysis found that “...fuel management elements of the Proposed Action would promote a reduction in the size and intensity of wildfires in ASRA/APL.”

Wildfire Prevention

As described above in this Master Response, the GP/RMP would locate facilities in appropriate locations to reduce the risk of wildfire ignitions. In addition, the Preliminary GP/Draft RMP contains multiple actions to reduce the risk of wildfire ignitions in ASRA/APL. Wildfire prevention measures in the Preliminary GP/Draft RMP include the following:

- ◆ Enforcing fire restrictions that prohibit fireworks and restrict campfires and camp stoves to designated locations (Guideline RES 9.1);
- ◆ Enacting and enforcing additional temporary restrictions based on wildfire hazard conditions, such as prohibiting campfires or open flames, prohibiting smoking, restricting the use of portable stoves, and closing portions of ASRA/APL to public access (Guideline RES 9.2);
- ◆ Implementing additional public education campaigns at ASRA/APL and in coordination with other agencies throughout the region to increase public awareness of wildfire risks and prevention measures (Guidelines RES 9.3, RES 9.4; I&E 1.4, I&E 1.5, and I&E 1.6; and OP 4.1);
- ◆ Increasing the number of law enforcement officers and other staff at ASRA/APL and entering into agreements with other law enforcement agencies to supplement CSP law enforcement (Guidelines OP 2.2, 3.2, 3.3, and 6.1);

- ◆ Prioritizing wildfire prevention as a top public contact and law enforcement priority (Guidelines OP 3.4 and RES 9.6);
- ◆ Maintaining fire safety and defensible space standards within and surrounding all facilities (Guidelines RES 8.6 and RES 8.7);
- ◆ Coordinating with utility providers to ensure that utility corridors within ASRA/APL are maintained to fire-prevention standards (Guideline RES 8.13).

In response to comments that expressed concern regarding wildfire risk associated with new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The Preliminary GP/Draft RMP has also been revised to clarify that an onsite assessment would determine whether campfires would be allowed and how they would be managed at each new or expanded campground. A new Guideline RES 9.7 has been added to the Preliminary GP/Draft RMP, which expands on considerations under RES 9.2, and is specific to the management of campfires as follows:

Guideline RES 9.7: Prior to developing a new campground or expanding an existing campground, Reclamation and CSP will determine whether campfires will 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 fire management requirements specific to each new or expanded campground during the planning phases and revisited again as necessary as conditions change, 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.

The wildfire prevention strategies described above would be implemented by CSP and Reclamation, in coordination with other agencies (See Guideline RES 9.1 above) The Preliminary GP/Draft RMP includes provisions to enhance funding and provide adequate staffing to implement these strategies (Guidelines OP 6.1, OP 6.2, OP 6.3, OP 6.4, OP 7.1, OP 7.2, OP 7.3, and OP 7.4).

The Draft EIR/EIS evaluates the effects of the wildfire prevention strategies in the Preliminary GP/Draft RMP under the subheading “Wildfire Frequency” as part of Impact 4.17-1 beginning on page 4.17-2. On page 4.17-12 in the Draft EIR/EIS, the analysis found that, “these measures are robust and would reduce the number of accidental and deliberate human-caused ignition sources associated with the Proposed Action, as well as reduce the number of ignitions that would otherwise occur under existing conditions. On balance, these measures could offset the risk associated with ignitions from additional visitation associated with the Proposed Action.” As described above, the Preliminary GP/Draft RMP has been revised to reduce the number of campgrounds and include additional guidelines regarding onsite campfire management actions, both of which would further reduce the potential for wildfire ignitions. Thus, the risk of wildfire ignitions under the revised GP/RMP would be less than the risks described in the Draft EIR/EIS and the significance determination of less than significant remains unchanged.

Emergency Response Improvements

In addition to the strategies described above that seek to prevent human-caused wildfire ignitions and reduce the extent and severity of those instances that would lead to wildfires, the Preliminary GP/Draft RMP includes actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as shown in Chapter 2 of this Final EIR/EIS. Specific emergency response improvements called for in the Preliminary GP/Draft RMP include the following:

- ◆ Preparing and maintaining an emergency access and evacuation plan for ASRA/APL that identifies emergency access and evacuation routes for all facilities, describes access improvements necessary for emergency access and evacuation, and maps emergency access/evacuation points and helicopter landing sites (Guideline RES 10.1 and new Guideline FAC 9.1);
- ◆ Incorporating emergency access recommendations into new or expanded facilities in coordination with the State Fire Marshal and other applicable fire agencies (Guideline RES 10.2 and new Guideline FAC 9.1);
- ◆ Providing emergency fire suppression equipment such as fire hydrants, water tanks, and water drafting equipment, where appropriate, at locations such as campsites and special event locations in coordination with CAL FIRE and other local fire agencies (see revised Guideline RES 9.6 in Chapter 2 of this Final EIR/EIS);
- ◆ Improving emergency communication infrastructure including the radio repeater system in ASRA/APL to improve radio coverage in coordination with other public safety agencies (see revised Guideline OP 3.5 in Chapter 2 of this Final EIR/EIS);
- ◆ Improving roadways and providing new trail bridges, as indicated in the GP/RMP, which would support faster and safer emergency access and evacuation, including along Knickerbocker, Rocky Island Bar, Upper Lake Clementine, Drivers Flat, Sliger Mine, and McKeon Ponderosa Roads, in coordination with appropriate agencies (Guidelines FAC 6.3, MZ 4.1, MZ 21.1, MZ 27.1, MZ 27.2, MZ 27.4, MZ 28.1, and revised Guidelines MZ 3.1 and MZ 6.1 in Chapter 2 of this Final EIR/EIS); and
- ◆ Improved signage, public information, and wayfinding, which would promote safer and faster evacuation and access to remote locations (Guidelines I&E 2.2 and V 2.1).

The Draft EIR/EIS evaluates the effects of the Preliminary GP/Draft RMP on wildfire emergency access and evacuation beginning on page 4.17-18 in Section 4.17, “Wildfire”. The analysis found that, “Potential delays in emergency response or evacuation caused by increases in visitation to the park would be offset by the improved road and access conditions implemented with the Proposed Action, as well as by improved planning and coordination measures taken by CSP and Reclamation in concert with Placer and El Dorado Counties.” (Draft EIR/EIS page 4.17-20). The effects of the Preliminary GP/Draft RMP on emergency access and evacuation are also evaluated beginning on page 4.12-22 in section 4.12, Transportation and Circulation. This analysis found that, “The [adverse] effects from the Proposed Action related to emergency access would be less than those of the No-Action Alternative due to the implementation of the goals and guidelines under the Proposed Action.” (Draft EIR/EIS page 4.12-23).

Some comments expressed concern about emergency evacuation planning outside of ASRA/APL. As described under Impact 4.17-2 beginning on page 4.17-18 of Section 4.17, “Wildfire”, in the Draft EIR/EIS, Placer and El Dorado Counties each have an Office of Emergency Services (OES) that coordinates emergency preparedness, response, and recovery to disasters within each county. Placer and El Dorado County OES are responsible for administering the emergency management program on a day-to-day basis and during disasters. Outside of ASRA/APL, Placer County and El Dorado County OESs coordinate evacuation response for residents in the event of a wildfire emergency and may designate routes for purpose of evacuation.

In summary, the potential need for emergency access and evacuation would remain regardless of whether a GP/RMP is adopted. However, adoption of the Preliminary GP/Draft RMP would result in substantial emergency response improvements. As described above, the Preliminary GP/Draft RMP has been revised to reduce visitor capacity and include revised guidelines with additional specificity regarding emergency access, which would further improve access during an emergency. Thus, the emergency response conditions under the revised GP/RMP would be improved compared to the conditions described in the Draft EIR/EIS.

Homeowner’s Insurance

Some comments noted that homeowner’s insurance rates have increased in fire prone areas and some nearby residents are having difficulty in finding adequate insurance. These comments express an opinion that implementation of the GP/RMP would exacerbate these issues. Many communities in fire prone areas of California are facing increased insurance premiums as insurance companies adjust to wildfire risks associated with climate change and residential development in the WUI. As described above, the GP/RMP would not increase wildfire risk, and would, therefore, not affect or exacerbate the current increases in insurance rates. Insurance rate increases are an existing condition that are not caused by the Preliminary GP/Draft RMP. Furthermore, insurance rates are not an environmental effect subject to CEQA or NEPA; and Reclamation and CSP have no delegated authority to regulate or manage the insurance industry.

Conclusion

As described above, wildfire is a serious risk in ASRA/APL, and this risk will continue in the future due to climate change, population growth, encroachment of urban development into naturally fire prone areas, and other factors. The Preliminary GP/Draft RMP seeks to anticipate and accommodate future visitation; reduce wildfire risk; protect natural and cultural resources; maintain public safety; and provide high-quality recreation opportunities consistent with the intent of a State Recreation Area. The Preliminary GP/Draft RMP seeks to reduce wildfire risk by locating recreation uses in appropriate, managed areas, substantially increasing the pace and scale of wildfire fuel reduction in ASRA/APL, instituting numerous measures to reduce the risk of human-cause wildfire ignitions, and improving emergency response infrastructure, coordination and preparedness. The Draft EIR/EIS appropriately analyzed the wildfire risk associated with the Preliminary GP/Draft RMP and compared that risk to the risk of continuing the status quo (i.e., the No-Action Alternative). The analysis found that, “Relative to the No-Action Alternative, the effects on the frequency, intensity, or size of wildfires; or risk of exposure of people or structures to wildfire from the Proposed Action would be less. This is attributable to the similar increase in visitation under both scenarios, offset by increased management and wildfire prevention activities that would be implemented under the Proposed Action.” (Draft EIR/EIS page 4.17-15).

3.2.4 Master Response 4: Traffic, Parking, and Access

Introduction

Several comments address topics related to traffic, parking, and vehicular access to and within ASRA/APL. Some comments describe existing traffic and parking congestion along SR 49 near the Confluence (i.e., near the SR 49 crossing of the North Fork of the American River in the Confluence Management Zone) and at other areas in ASRA/APL. Comments contend that the Preliminary GP/Draft RMP will increase traffic leading to increased delays or hindering emergency access. Other comments oppose the proposed opening of existing administrative roads within ASRA/APL for public vehicular access, or request that the GP/RMP include measures to reduce parking and roadway congestion.

This master response describes the GP/RMP strategies that would reduce congestion and improve circulation. It describes the rationale for and approach to providing public vehicular access on certain existing administrative roads. This response then summarizes the effects of the Preliminary GP/Draft RMP related to traffic generation, intersection and roadway operations, and emergency access.

GP/RMP Strategies to Reduce Congestion

Many comments describe existing parking congestion in ASRA/APL and suggest that the GP/RMP should include measures to improve parking conditions or express concerns that the Preliminary GP/Draft RMP could increase parking congestion.

The GP/RMP acknowledges that parking congestion is an existing problem within ASRA/APL. As described in more detail under the heading “Parking Limitations and Congestion” beginning on page 3-14 of the GP/RMP, parking is very limited in ASRA/APL and parking congestion occurs in heavy-use areas, especially at the Confluence, some trailhead staging areas, river access points, river beach-use areas, SR 49-mile marker 64, and at lower Lake Clementine.

As described in Master Response 1, “Purpose of the General Plan/Resource Management Plan,” above, the Preliminary GP/Draft RMP would not generate substantial new visitation that would increase the demand for parking. Instead, the GP/RMP includes provisions to address existing parking congestion and manage parking demand that will occur in the future due to local and regional population growth and demand for recreational access at ASRA/APL. This increase in parking demand will occur regardless of whether the GP/RMP is approved and implemented.

To address existing and anticipated future parking congestion, the GP/RMP allows for the creation of up to 470 additional parking spaces. These parking spaces would be developed over time in response to demonstrated need. For example, if existing parking areas regularly reach capacity early in the day and/or excessive unmanaged parking occurs outside of designated parking areas, CSP and Reclamation could plan, evaluate, and design site-specific projects to construct additional parking spaces up to the maximum number allowed in the GP/RMP (see Table 4.5-2 in Chapter 4, The Plan of the GP/RMP, and Table 2.4-2 in Chapter 2, Project Description and Alternatives, in the Draft EIR/EIS). The additional parking capacity could be located in the Knickerbocker, Auburn Interface, Cherokee Bar/Ruck-a-Chucky, Upper North Fork, Mineral Bar, and Mammoth Bar Management Zones (see Guideline FAC 4.2 and Table 4.6-1 in Chapter 4, The Plan, of the GP/RMP, and Figures 2.6-1a through 2.6-1d and Section 2.6, Proposed Action – Increased Recreation and Resource Management Alternative, in the Draft EIR/EIS).

The Preliminary GP/Draft RMP would also address existing congestion and future parking demand with the strategies described below.

- ◆ **Shuttle or Transit Service:** Establishing alternatives for accommodating peak period or special event parking, such as satellite parking areas and shuttle or transit services (See Guidelines FAC 4.1 and FAC 8.3 in the GP/RMP). Shuttle or transit services could be developed in coordination with local jurisdictions and/or concessionaires and could reduce parking congestion by providing an alternate means to access recreation opportunities that do not require parking in existing areas located within ASRA/APL.
- ◆ **Redirecting Visitors:** Address parking congestion by providing additional public access points and day use facilities, which could reduce congestion by dispersing visitors that would otherwise be concentrated at fewer locations. See Guidelines MZ 3.1 and 6.1, which would provide alternate river access points near Rocky Point and Greenwood/Ruck-a-Chucky to reduce congestion at other river access points.
- ◆ **Managing Event Traffic:** Implement revised Guideline V 5.5 (see Chapter 2 of this Final EIR/EIS), which requires that special events with 100 or more participants 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.

As described above, the Preliminary GP/Draft RMP would not attract substantial new visitation that could contribute to existing parking and roadway congestion, and it includes a variety of measures to reduce congestion.

Improvements to Circulation on SR 49 near the Confluence

Many comments note that there are vehicle and pedestrian circulation problems near the Confluence, and express concerns that the Preliminary GP/Draft RMP could exacerbate these issues. The GP/RMP recognizes that the Confluence is the most heavily used portion of ASRA/APL, and vehicle and pedestrian circulation challenges exist along SR 49 near the Confluence. During peak periods, parking demand exceeds available parking supply in this area. At these times, pedestrians often park and walk along SR 49, where traffic controls and crosswalks were never envisioned to accommodate this level of use and are inadequate to address current usage. The GP/RMP also describes the challenges to improving circulation in this area, including the steep topography and increasing demand for recreational access (see the heading “Managing Visitor Use and Access” beginning on page 3-17 of the GP/RMP).

To achieve its intended goals (see Master Response 1), the Preliminary GP/Draft RMP includes numerous strategies to improve vehicle and pedestrian circulation along SR 49 near the Confluence in addition to the strategies discussed above.

- ◆ **Formalized Parking:** CSP and Reclamation would coordinate with Caltrans and other affected agencies to formalize parking improvements along SR 49 near the Confluence (see Guideline MZ 10.1). Formalized parking could include widening of road shoulders, striping, elimination of parking and/or reconfiguring existing areas where informal parking occurs to provide safer and more functional parking.

- ◆ **Pedestrian Improvements** CSP and Reclamation would coordinate with Caltrans and other affected agencies to install pedestrian safety improvements at the Confluence (see Guideline MZ 10.1). Pedestrian safety improvements could include the installation of crosswalks, sidewalks or paths, vehicle barriers, signage, and/or pedestrian crossing signals, which would provide for safer pedestrian movement and reduce traffic congestion associated with unmanaged pedestrian access along SR 49.
- ◆ **Drop-off Locations:** Guideline MZ 10.2 directs CSP and Reclamation to coordinate with appropriate agencies, transit providers, or concessionaires to develop transit or shuttle drop-off areas near the Confluence. This would reduce congestion by reducing the demand for parking at the Confluence and may reduce traffic congestion throughout ASRA/APL as cars are routed to designated pick-up/drop off areas instead of moving throughout trying to find adequate parking.
- ◆ **Real-time Parking Information:** In addition, the Preliminary GP/Draft RMP indicates the need for improved wayfinding information, such as changeable message signs and smartphone applications that can provide improved information on parking availability (see Guideline MZ 10.3). This would make more efficient use of available parking and direct visitors to other locations when parking is not available at the Confluence.

As described above, the GP/RMP includes several guidelines that identify where CSP and Reclamation would be required to coordinate with Caltrans on parking and congestion improvements along SR 49 near the Confluence. This area is within the right-of-way of SR 49, which is under the jurisdiction of Caltrans. CSP and Reclamation do not control parking or pedestrian issues along the shoulder of SR 49 and must work through Caltrans. CSP and Reclamation are currently coordinating with Caltrans to address parking and congestion in this area, and have proposed changes to minimize and reduce parking congestion, but Caltrans' approval is required for any actions taken within the SR 49 right of way. New Guideline MZ 11.4 also reflects the efforts CSP and Reclamation will take to address traffic issues along SR 49 near the Confluence (see Chapter 2).

In summary, the Preliminary GP/Draft RMP would not substantially contribute to additional visitation near the Confluence that could exacerbate the existing parking, roadway congestion and pedestrian crossing issues. Instead, it includes numerous measures to reduce congestion at the Confluence and increase safety.

Changes to Roadway Access within ASRA/APL

Several comments oppose elements of the Preliminary GP/Draft RMP that would allow new public vehicular access on some existing roads within ASRA/APL. Comments question the rationale for opening the roads and cite concerns about the condition of these roads and the effects of vehicle traffic on these roads on recreational use and other resources. The Preliminary GP/Draft RMP would allow CSP and Reclamation to consider new public vehicle access at two locations:

- ◆ the Rocky Point/Salt Creek Activity Node from SR 49 near Cool along Knickerbocker and Rocky Island Bar Roads (see Figures 4.4-1 and 4.4-2 on pages 4-61 and 4-65 of the GP/RMP), and
- ◆ the Greenwood/Ruck-a-Chucky Activity Node along McKeon-Ponderosa Road (see Figure 4.4-8 on page 4-91 of the GP/RMP).

The Preliminary GP/Draft RMP also calls for improving the conditions of existing roadways, including along Upper Lake Clementine, Drivers Flat, and Sliger Mine Roads, in coordination with appropriate agencies (Guidelines MZ 21.2, MZ 27.2, and revised Guideline MZ 26.2 in Chapter 2 Revisions to the Preliminary GP/Draft RMP, in this Final EIR/EIS). Each of these improvements would involve a comprehensive project-level planning and design process (see new Guideline FAC 9.1 in Chapter 2 of this Final EIR/EIS). This planning process would include coordination with appropriate agencies, implementation of fire fuel treatments, project-level environmental review, and a public involvement process. The rationale for each of the locations where new public vehicle access is proposed is provided below:

- ◆ **Knickerbocker and Rocky Island Bar Roads:** The Preliminary GP/Draft RMP could allow public vehicle access to the North Fork American River along the Knickerbocker and Rocky Island Bar Roads to provide an alternate river access point that could reduce congestion and crowding at the Confluence. Providing this alternate river access point near the Confluence, would reduce congestion at the Confluence as some visitors that would otherwise access the river at the Confluence would access that river at this alternate location. Some comments noted that physical improvements to the roadway would be necessary to provide safe access, prevent unauthorized off-road vehicle access, and preserve trail connections. In response, Guidelines MZ 3.1 and MZ 6.1 were revised to add the following language (See Chapter 2 of this Final EIR/EIS):

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; and developing alternate trail routes where the road serves as a primary trail route.

- ◆ **McKeon Ponderosa Road:** The Preliminary GP/Draft RMP could also allow public access to the river near the Ruck-a-Chucky Campground via the McKeon Ponderosa Road. Existing access to this site is available only via the Drivers Flat road, which is steep and narrow. This site is a popular location for commercial rafting companies and large vans are often present on Driver's Flat road, making visitor access difficult. Opening the McKeon Ponderosa Road would improve the safety of recreational access and provide more convenient access for visitors entering from the vicinity of Foresthill and Todd Valley. Importantly, this road access would provide a second emergency access and evacuation route that could improve the speed and safety of evacuations or emergency access in the event of a wildfire or other emergency. As with the Knickerbocker and Rocky Island Bar Roads, physical improvements to provide safe access and protect resources would occur prior to opening of the road. All improvements and vehicle access would be closely coordinated with other applicable agencies (see revised Guideline MZ 27.1 in Chapter 2 of this Final EIR/EIS). This road was previously open to the public prior to a washout and subsequent closure for repair. Reclamation is the major landowner on McKeon Ponderosa Road, which was part of the original Ponderosa Way constructed by the Civilian Conservation Corps in the 1930's primarily for fire control access. Greenwood Bridge had formerly allowed public connection with Sliger Mine Road.

The Preliminary GP/Draft RMP would not result in the construction of new roads. As described above, it could allow public vehicle access along two existing road corridors and improve the physical condition of other existing roadways that are already open to the public. These changes are intended to improve public safety, reduce congestion, and improve access to recreational opportunities. The environmental effects of these changes were evaluated in Chapter 4 of the Draft EIR/EIS and were determined to be less than significant for the purposes of CEQA. In addition, prior to any physical changes to these roads or changes in use, a project-level planning process would be conducted

including coordination with appropriate agencies, project-level environmental review, and a public involvement process. The project-level environmental review would identify the site-specific environmental effects at the time that a specific roadway change is proposed, and would include mitigation measures, if necessary, to address any project-specific significant impacts.

Traffic Associated with the GP/RMP

A number of comments express concern about traffic generated by visitation at ASRA/APL, many of which contend that the GP/RMP would result in a 45 percent increase in traffic on local roads. As described in more detail in Master Response I, Purpose of the General Plan/Resource Management Plan, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040 due to growth in the local and regional population, regardless of whether a GP/RMP is adopted.

In response to comments opposed to the development of new campsites, and based on a reasoned estimate of what certain areas could support given physical constraints (topography, grade, etc.), the Preliminary GP/Draft RMP has been revised to reduce the maximum number of new campsites that could be developed to no more than 142 (see Chapter 2, Revisions to the Preliminary GP and Draft RMP, and Master Response I, above. Under the Preliminary GP/Draft RMP, visitor capacity could accommodate a minor increase over the level of visitation that is expected solely due to increased demand from population growth if every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum possible size. Thus, the net additional traffic that could result from implementation of the Preliminary GP/Draft RMP would be attributable to the minor increase in visitor capacity over approximately 20 years.

As described in the Draft EIR/EIS in under the “Trip Generation” header in Section 4.12, Transportation and Circulation, the Draft EIR/EIS analysis accounts for all trip generation associated with all new parking lots and campsites. This analysis approach is conservative with the intent to avoid understating an impact. In fact, it overstates the traffic that would be attributable to the GP/RMP for two reasons. First, nearly all of the visitation and associated vehicle trips are driven by local and regional population growth, which would occur regardless of whether the improvements proposed in the Preliminary GP/Draft RMP are constructed. Without the GP/RMP, many of these vehicle trips would still occur, except they would park along roadways and other informal areas instead of in new parking areas proposed in the GP/RMP. Secondly, the Draft EIR/EIS conservatively evaluates trips generated by 230 new campsites. With the revisions to the Preliminary GP/Draft RMP, up to 142 new campsites could be constructed. This represents a reduction of approximately 277 daily weekday vehicle trips and 427 daily weekend trips from the trip generation analyzed in the Draft EIR/EIS (see Tables 4.12-7 and 4.12-8 on pages 4.12-7 and 4.12-8 of the Draft EIR/EIS). Therefore, the total number of trips generated by the GP/RMP would be less than that which was disclosed in the Draft EIR/EIS. The number of trips generated by each of the alternatives is factored into the traffic modeling and forms the basis for the associated impact determinations in the EIR/EIS. Thus, the amount of traffic within the project study area would be less, and the associated traffic operations impacts would be less than that which is disclosed in the Draft EIR/EIS. The results of the conservative traffic analysis in the Draft EIR/EIS is summarized below.

Intersection Operations

With implementation of the Preliminary GP/Draft RMP, all study intersections would continue to operate at an acceptable Level of Service (LOS), even with the conservative estimates of additional of traffic generated by the Preliminary GP/Draft RMP (see Impact 4.12-1 in Section 4.12, Transportation

and Circulation, of the Draft EIR/EIS). Therefore, the Draft EIR/EIS determined that impacts to intersection operations from implementation of the Preliminary GP/Draft RMP would be less than significant for the purposes of CEQA. As described in the Draft EIR/EIS under the “Cumulative Impacts” header in Section 4.12, Transportation and Circulation, the conservative estimate of new vehicle trips associated with the Preliminary GP/Draft RMP, in combination with the cumulative traffic associated with continued growth and development in the region, could potentially result in the intersection of SR 49/SR 193/Old Foresthill Road being degraded to an unacceptable LOS condition. Therefore, the Draft EIR/EIS determined that this impact was cumulatively significant.

The Draft EIR/EIS includes Mitigation Measure 4.12-7a to improve the LOS at this intersection in coordination with Caltrans at the time the intersection improvement is necessary. As detailed under the “Mitigation Measures” header on page 4.12-31 of the Draft EIR/EIS, Mitigation Measure 4.12-7a would convert the intersection of SR 49/SR 193/Old Foresthill Road to a signalized intersection; thus, resulting in acceptable operation conditions at this location. Additionally, as detailed below under the heading “Recent CEQA Guidance Related to Level of Service,” Mitigation Measure 4.12-7a has been revised and converted to a new guideline in the Preliminary GP/Draft RMP.

As detailed in the Draft EIR/EIS in the “Cumulative Impacts” discussion of Section 4.12, Transportation and Circulation, the intersection modeling and analysis assumed a traffic signal-controlled intersection for the intersection of SR 49/SR 193/Old Foresthill Road. This assumption is based on existing site constraints which limit the available improvement options. However, the exact intersection improvement will be determined in coordination with Caltrans and after completing the ICE TOPD intersection control evaluation process. For the reasons described above, the Preliminary GP/Draft RMP would not degrade the operations of intersections.

Roadway Operations

With implementation of the Preliminary GP/Draft RMP, all study roadway segments would continue to operate at acceptable LOS even with the conservative assumptions of additional traffic included in the Draft EIR/EIS (see Impact 4.12-2 in Section 4.12, Transportation and Circulation, in the Draft EIR/EIS). Therefore, the impacts to roadway operations under the Preliminary GP/Draft RMP (i.e., the CSP Proposed Action in the Draft EIR/EIS) would be less than significant for the purposes of CEQA. As described in the Draft EIR/EIS under the “Cumulative Impacts” header in Section 4.12, Transportation and Circulation, even with the conservative estimate of new vehicle trips associated with the Preliminary GP/Draft RMP in combination with the cumulative traffic associated with continued growth and development in the region all roadway segments would continue to operate at acceptable levels.

Some comments suggest that the roadway segment analysis for the portion of SR 49 between SR 193 and Old Foresthill Road (i.e., SR 49 near the Confluence) does not account for sections of the roadway with sharp curves that have signage warning drivers to reduce their travel speed. Contrary to these comment’s assertion, the Draft EIR/EIS accurately evaluates this roadway segment using current state-of-the-practice evaluation techniques recommended by the Transportation Research Board (TRB). Roadway segment analysis for rural highways, such as this portion of SR 49, represent the average conditions present along the segment. The Highway Capacity Manual, 6th Edition (TRB 2017) dictates that the base free-flow speed used for two-lane highway analysis be the speed limit plus 10 miles per hour as a default value. The analysis contained in the Draft EIR/EIS is somewhat conservative because it uses the actual speed limit of 45 miles per hour without adding the additional 10 miles per hour recommended in the TRB methodology. The methodology in the Highway Capacity Manual adjusts the base free-flow speed based on built parameters including topography, lane/shoulder width amongst

other factors to free-flow speed. The methodology then calculates the average speed, which accounts for other input data including terrain type, traffic volume, percent of trucks and buses, etc. The average speed is reported in the technical calculations shown in Appendix E of the Draft EIR/EIS and is included in the calculations of volume to capacity ratio and level of service for the peak hour.

As shown in the calculations, under existing conditions, the afternoon (PM) peak hour average speed of SR 49 northbound (downhill) between Old Foresthill Road and 1.8 miles south of Old Foresthill Road is 25.5 miles per hour, while the average speed of SR 49 southbound (uphill) between 1.8 miles south of Old Foresthill Road and Old Foresthill Road is 23.1 miles per hour. These speeds accurately reflect actual vehicle speeds along this section of SR 49.

In response to comments the worst conditions along this roadway segment were tested using the “Specific Grade” option, which more precisely accounts for the exact grade within a portion of a roadway segment. This analysis was conducted for Cumulative Plus Project conditions (i.e., with full build out of all facilities in ASRA/APL and the surrounding region) for the northbound direction during the morning peak hour, assuming the terrain was a negative 8 percent grade for 2 miles; and for the southbound direction during the afternoon peak hour, assuming the terrain was a positive 8 percent grade for 2 miles. This analysis evaluated the worst conditions on the segment considering the steep and winding topography and found that the roadway segment would still yield acceptable LOS D conditions. Thus, the Draft EIR/EIS accurately evaluated roadway operations and appropriately determined that the Preliminary GP/Draft RMP would not degrade roadway operations to an unacceptable level.

Recent CEQA Guidance Related to Level of Service

As described above, the Draft EIR/EIS evaluated the effects of the alternatives on roadway and intersection LOS. However, 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*) have clarified that LOS shall no longer be used to determine the significance of an impact under CEQA.

For background, in late 2018, amendments to the State CEQA Guidelines were adopted, including California Code of Regulations (CCR) Section 15064.3, “Determining the Significance of Transportation Impacts.” It includes the statement that, except for roadway capacity projects, “a project’s effect on automobile delay shall not constitute a significant impact.” In addition, the 2018 amendments to the CEQA Guidelines added CCR Section 15064.3(c), which states:

Applicability. The provisions of this section shall apply prospectively as described in section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.

By referring to CCR Section 15007, the deadline of no later than July 1, 2020 was set as the date by which the new guidelines (e.g., Vehicle Miles Travelled [VMT]) must be followed. This requirement, like all new CEQA requirements, applies to CEQA documents that were not yet circulated for public review before the implementation date.

Following certification of the updated guidelines on December 28, 2018, an apparent gap between PRC Section 21099 (the current guidelines for traffic impact analysis) and CCR Section 15064.3 was created. However, many lead agencies, like CSP, elected to continue evaluating transportation using LOS before July 1, 2020. However, on December 18, 2019, the Third District Court of Appeal ruled in favor of the

City of Sacramento's approval and adoption the City of Sacramento 2035 General Plan and certification of the Environmental Impact Report (EIR) for the City of Sacramento 2035 General Plan Update. The decision in the *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) is notable for its ruling on the applicability of State CEQA Guidelines Section 15064.3 as it relates to projects for which draft EIRs are published before July 1, 2020 (i.e., the VMT impact analysis opt-in date). The ruling issued by the Third District Court affirms that upon certification of the guidelines by the Secretary of the Natural Resources Agency (i.e., on December 28, 2018), automobile delay no longer constitutes a significant impact on the environment under CEQA and that it is optional for a lead agency to analyze transportation impacts using VMT until July 1, 2020, after which it becomes mandatory.

Consistent with this recent guidance, the Draft EIR/EIS has been revised to remove the use of LOS as a significance criterion (see Chapter 4, Revisions to the Draft EIR/EIS, in this Final EIR/EIS). 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 has been converted into a new Guideline MZ 11.4 (see Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS). Thus, the Final EIR/EIS has been revised to be consistent with the December 2019 case law, but the intent of the mitigation measure has been retained and enhanced to reflect the role of Reclamation and CSP in coordinating with Caltrans to address these traffic issues.

Emergency Access

Some comments express concern that the Preliminary GP/Draft RMP would result in increased congestion that would interfere with emergency access and evacuation. However, as described above, the Preliminary GP/Draft RMP would not result in substantial new traffic volumes or delays to intersection or roadway operations, even with the conservative trip generation assumptions included in the Draft EIR/EIS and even under cumulative regional and full project build out conditions. Furthermore, under emergency evacuation conditions, it is likely that key intersections would be staffed by public safety officers manually directing traffic, thereby overriding standard traffic controls. Emergency personnel would restrict traffic entering the evacuation area to maximize roadway capacity for evacuating traffic. Inbound lanes, or portions thereof, could be redirected to provide additional outbound capacity. Thus, there is no evidence to suggest that implementation of the Preliminary GP/Draft RMP would substantially degrade emergency access or evacuation.

The Preliminary GP/Draft RMP includes numerous strategies to improve emergency access and evacuation, including improving road conditions in ASRA/APL; preparing and maintaining an emergency access and evacuation plans; incorporating emergency access recommendations from the State Fire Marshal, CAL FIRE, and other agencies into the design and implementation of new or expanded facilities; and improving emergency radio communication infrastructure. See the section titled "Emergency Response Improvements" in Master Response 3. Wildfire Risk, for a full list of proposed emergency access improvements. The Draft EIR/EIS evaluated the effects of the Preliminary GP/Draft RMP on emergency access and determined that, "[b]ecause implementation of the goals and guidelines under the Proposed Action would involve the preparation and maintenance of an emergency access and evacuation plan, and implementation of recommendations from applicable fire agencies in the construction and design of facilities, adequate emergency access within ASRA/APL would be provided." (Draft EIR/EIS page 4.12-22). The Draft EIR/EIS compared the effects of the Preliminary GP/Draft RMP to the results of maintaining the status quo (i.e., the No-Action Alternative) and determined that the Preliminary GP/Draft RMP would improve emergency access relative to the No Action Alternative because there would be a similar increase in visitation under both scenarios, but there would be improved emergency access infrastructure, preparedness, and coordination under the Preliminary GP/Draft RMP (Draft EIR/EIS page 4.12-23).

Conclusion

As described above, the Draft EIR/EIS recognizes existing parking and circulation challenges in ASRA/APL. It does not seek to attract substantial new visitation to ASRA/APL, but rather includes numerous strategies to reduce existing parking congestion and improve vehicle and pedestrian circulation. It includes targeted changes to existing roadway use in ASRA/APL to improve public safety and recreation opportunities and reduce congestion. Each of the roadway changes was evaluated in the Draft EIR/EIS and would undergo a comprehensive project-level planning and environmental review process.

The Draft EIR/EIS appropriately and conservatively evaluated the transportation effects of the Preliminary GP/Draft RMP. As demonstrated in the Draft EIR/EIS, implementation of the Preliminary GP/Draft RMP would not substantially degrade roadway or intersection operations or emergency access.